

Matter 10: The delivery of the plan

Whether the proposed development is sufficiently viable to enable the delivery and implementation of the spatial requirements of the JCS?

- 77. Is there appropriate certainty, and evidence that infrastructure provision will be provided at an appropriate quantum, in a timely fashion, and at appropriate suitably accessible locations, so as to support the delivery of the growth proposed within the GCP and the JCS?**
- 77.1 The overall findings of the Gloucester Infrastructure Delivery Plan (IDP) (Submission Document INF001) are that the levels of growth set out in the GCP are modest in size, and that much of the strategic infrastructure needs are dealt with at the JCS-level. The key risks to plan delivery were ensuring sufficient education provision, delivery of local highways schemes, and management of flood risk.
- 77.2 The IDP was prepared in the context of the JCS IDP (various INF Submission Documents), which considered the infrastructure needs associated with strategic growth set out at the JCS-level. The IDP advised that the delivery of infrastructure on the JCS Strategic Allocations sites can help to respond to increased demands associated with the growth set out in the GCP, that community infrastructure levy receipts were pooled to aid the delivery of infrastructure and that projects should be prioritised to ensure timely delivery of the most critical infrastructure. The JCS team continue to regularly produce JCS Project Trackers and prioritise the infrastructure requirements and CIL pooling.
- 77.3 Whilst the JCS team continue to monitor the delivery of all infrastructure identified in the JCS IDP the three councils, in their role as CIL Charging Authorities, are also now required to publish, at least annually, an Infrastructure Funding Statement (IFS) which includes an 'Infrastructure List'. The three JCS Authorities published their first IFSs in December 2020. The 2020 IFSs include a shared infrastructure list which focuses on projects, identified as 'Critical' in the JCS IDP, to the delivery of the growth identified in the JCS, that the partners 'intend' CIL funding 'may' be partly or wholly spent on. All of the infrastructure schemes included on the infrastructure list are highways and transport schemes required to mitigate the cumulative impact of development.
- 77.4 JCS Policies INF6 and INF7 set out the Council's adopted approach to infrastructure delivery and developer contributions.
- 77.5 In terms of local highway projects, the Gloucester City Plan Transport Assessment (Submission Document SUS003) sets out that mitigation is required at four junctions to accommodate the GCP site allocations. Two of the junctions (A417/A430/Castle Meads Way and A38/B4008/Cole Avenue) are included in DS7, which is the agreed mitigation package as part of the JCS. One of the junctions (A430/Spinnaker Road) will be improved as part of the County Council's proposed Southwest Bypass scheme. The final junction (A430/Llanthony Road) requires only minor changes to move a stop line to improve flow.
- 77.6 Education contributions, where demonstrated to be 'necessary to make a development acceptable in planning terms', where the need is 'directly related' to that development and where the contributions are 'fairly and reasonably related in scale and kind to the development' (the three tests in Reg 122) will continue to be secured by way of s106. This approach has been outlined in the Gloucester Infrastructure Delivery Plan Addendum

(Submission Document INF002), Infrastructure and Viability Background Paper (Submission Document INF003) and Statement of Common Ground with Gloucestershire County Council Education (SoCG6). While there is a shortfall between what the viability testing demonstrates is available for s106 and the potential maximum requirements of the County Council for education contributions, the City Council are comfortable that the need will be met through alternative funding sources as outlined in INF002 and INF003. For example, two new schools (420 primary places and 900 secondary places) have recently received funding from the Free Schools programme which did not form part of the original IDP.

77.7 The Gloucester Infrastructure Delivery Plan Project Tracker (Submission Document INF001/c) is in the process of being updated. A number of projects have progressed since the last update in September 2019, demonstrating that infrastructure continues to be provided through funds and programmes outside of the planning system. It is important to note that many of the projects identified on the tracker have been drawn down from the JCS IDP and are being progressed as part of the JCS. For example, a number of the transport infrastructure projects are part of the agreed mitigation package DS7 of the JCS.

77.8 The IFSs will be a useful tool in the planning and review of infrastructure delivery going forward. The IDP is an iterative document and as the plan period progresses, along with the development and review of the IFSs, and the JCS review, there will be opportunities to ensure that the GCP and JCS Project Trackers are updated and that critical infrastructure projects are prioritised.

78. Should affordable housing be promoted ahead of other forms of infrastructure or policy requirements as referenced in paragraph 3.7.30 of the GCP?

78.1 Following comments made during the GCP Pre-Submission consultation the Council proposed a change to remove the prioritisation of affordable housing ahead of other forms of infrastructure. The proposed change can be found in Submission Document CD010a 'Schedule of changes Pre-Submission Gloucester City Plan Addendum' (reference PM075) and shown as part of the GCP in Submission Document CD010b 'Appendix 1 -Tracked Change Pre-Submission Gloucester City Plan'.

78.2 Whilst the Council acknowledges there is an acute need for affordable housing, prioritisation of affordable housing ahead of other infrastructure requirements predetermines what may be required in order to achieve sustainable development on a site by site basis.

78.3 Where planning obligations are required to assist in mitigating the impact of otherwise unacceptable development, other infrastructure maybe considered necessary to make the development acceptable in planning terms and meet the statutory tests in Regulation 122 (as amended by the 2011 and 2019 Regulations).

79. Does the evidence demonstrate that the level of development proposed within Gloucester, and defined within the JCS, will be viable and deliverable given the wider policy requirements of the GCP, such as ensuring developments are in keeping with the historic city, and the specific policy requirements which have been the subject of specific viability testing? Are these specific policy requirements and costs broadly consistent with those set out within the JCS? If not, what is the justification for any divergence between the two?

79.1 PPE, a specialist planning viability consultancy, was commissioned by the Council to provide a high-level city-wide economic viability assessment of the Council's Pre-Submission

Regulation 18 City Plan. This evidence was undertaken in accordance with the NPPF and was used to inform policy decisions based on the policy aspirations of achieving sustainable development and the realities of economic viability.

- 79.2 The Viability Appraisal has been submitted as Submission Document VIA001, and Chapter 3 Table 3.1 of this report identifies the GCP policies that were considered to have a viability impact on development. Some policies, such as those relating to supporting a historic city, were identified through developing the site typologies to reflect local sensitivities in terms of location of allocated development sites, scale based on densities and the likely capacity restrictions in the historic city environment.
- 79.3 Policies that were considered to have a significant viability impact rather than de minimis viability implications, were given appropriate consideration through specific testing of the policy implications in VIA0001, Chapter 6 through iterative policy layering. At the full policy ask, this was tested as Policy Layer 6, which included:
- Adopted CIL rates and all policies within the adopted JCS, which on sites with 11+ dwellings include affordable housing at 20% at a mix of 75% affordable rented and 25% intermediate shared ownership;
 - A S106 contribution of £2,500 per unit;
 - Policy H8: Cotswold Beechwoods Special Area of Conservation contribution;
 - Policy H3 electric charging points;
 - Policy A6, with 50% of open market development achieving M4(Cat 2) access standards and a further 4% of affordable units achieving M4(Cat 3).
- 79.4 Chapter 6 of VIA0001, paragraph 6.8 summarises the impact of these policies on tested site typologies and concludes that the bulk of the Pre-Submission GCP site allocations (delivering 70% of the allocated housing supply) would be able to come forward under the cumulative full policy requirements.
- 79.5 Additional viability testing was then undertaken on varying the JCS Policy SD12 requirement by increasing the minimum 20% affordable housing target to a 25% affordable housing target on major sites with 10 or more units. Based on the viability findings in VIA0001 Chapter 6 Table 6.2, which is summarised in paragraph 6.10, the requirement for 25% affordable housing target was identified to not affect the delivery of the site allocations (delivering 70% of the allocated housing supply) that were deemed to be able to come forward at full policy requirement. This informed the GCP position to require 25% affordable housing on sites in Gloucester (Policy A2: Affordable Housing).
- 79.6 VIA0001 Chapter 6 paragraph 6.11 notes that based on the viability testing of site typologies in the lower and mid value ward areas, then it might be likely that site allocations policies SA02, SA05, SA16 and SA19 in the Pre-Submission GCP, which account for 28% of the site allocations' housing supply within the Pre-Submission GCP, may struggle to fully meet local plan policies, and therefore some flexibility may be considered to be appropriate in line with the Pre-Submission Regulation 18 GCP Policy G8. But this may be necessary for only a minority of sites.
- 79.7 The evidence in VIA001 was later updated in VIA002 in November 2020 to reflect changes in or new information about the tested development assumptions since VIA001 was prepared. This included updating the sales values, build costs and CIL rates to the values at the latest available date, new information about the contributions that will be required to meet Policy

E8 Cotswold Beechwoods SAC, and further information about expected s106 requirements, plus further sensitivity testing to identify an expected average s106 that might be afforded by the bulk of sites. The findings identified the same results at VIA001, but also identified, for illustration purposes, that the average s106 cost may be able to increase to £7,500 per unit without putting at risk the bulk of sites.

79.8 Both VIA001 and VIA002 tested the cumulative policy requirements of meeting the JCS policies and the Pre-Submission GCP. As noted above, there is only divergence between the two plans in relation to the JCS Policy SD12 'Affordable Housing', which requires a minimum 20% affordable housing on sites of 11 or more units in Gloucester, while the Pre-Submission GCP Policy A2 'Affordable Housing' requires a definitive 25% affordable housing on sites of 11 or more units in Gloucester. So, the viability findings do reflect, and are consistent with, the specific policy requirements and costs set out within the JCS, and the deviation from the JCS Policy SD12 is justified based on the viability findings set out in VIA001 and VIA002.

80. Are the assumptions, on which the Gloucester City Plan Viability Report and Addendum are predicated, transparent? Is there any divergence between the basis on which the CIL charging levels were set and those underpinning the viability assessment (VA) reports? If so, what is the significance of this?

80.1 The GCP Viability Report (Submission Document VIA001) and Addendum (Submission Document VIA002) discuss the viability assumptions, which are set out in detail in VIA001 Chapter 5. These assumptions provide the viability evidence that is in line with the requirements of the NPPF paragraph 31 and also reflected in PPG on Viability, which states: *'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'*

80.2 Also, they comply with the interpretation of 'adequate' as reflected in NPPF para 57, which states: *"All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available."*

80.3 As noted in VIA001 paragraph 1.12, there were discussions with the local development industry about development assumptions that informed the tested assumptions contained within the document. The Council invited 43 local development industry participants to a viability workshop, and seven attendees from the development industry, along with the council and the council's viability consultants discussed and reviewed the viability assumptions informing VIA001. A meeting note of the discussion was circulated to all attendees, and this is shown in VIA001 Appendix B.

80.4 The only divergence between the basis on which the CIL charging levels were set and those underpinning VIA001 and VIA002 is the inclusion of testing additional policy requirements in the Pre-Submission GCP Policy and updated assumptions. Despite more guidance about the approach to viability testing local plans being introduced through the PPG Viability in 2018 and 2019, the same approach that was used in viability testing CIL for the JCS (which was examined and adopted) was used in viability testing the Pre-Submission GCP because this approach was in line with the recommended guidance.

80.5 One potential difference between the viability work for CIL and the GCP may relate to the assumptions being tested for section 106 (s106) costs excluding affordable housing. The CIL

hearings reviewed this and acknowledged that a potential s106 to cover non CIL related items may be afforded up to about £3,000 per unit on a typical site with typical development assumptions in Gloucester. In the most recent viability work, VIA002, it was recommended that this policy cost could increase to about £7,500 per dwelling, or £5,000 per dwelling should the revised Local Housing Needs Assessment affordable housing tenure mix be applied.

81. How has the amendment to the Community Infrastructure Regulations 2010 affected the Council's approach to the delivery of infrastructure? What impact will this have on the timing and viability of the delivery of proposed developments?

81.1 Following changes to the CIL regulations in late 2019, both s106 and CIL can be used to secure off-site infrastructure. Consequently, the County Council's new interim position on developer contributions is seeking to secure education contributions through development using S106 contributions rather than just CIL. The Council's viability consultant, PPE, was therefore asked to review the additional headroom that may be available for supporting any potential changes to the JCS policy for infrastructure funding. Submission Document VIA002 sets out this work and the findings show that a potential s106 to cover non CIL related items may be afforded up to about £7,500 per dwelling without undermining the deliverability of the Pre-Submission GCP. This may be used for paying towards the additional County Council's new interim position on developer contributions and revised formula for education contributions.

82. My understanding is that the viability assumptions set out within the September 2019 Viability Report have been amended in relation to updated Sales Values, Build Costs, S106 contributions, more up to date mitigation costs relating to the Beechwood SAC, and marginal increases in CIL levels. Is this approach justified by evidence? Is the quantum of S106 contributions tested realistic and justified by evidence? Have any changes to benchmark land values been considered? Also, should Tables A5, A6 and A7 be rerun using the 2020 Local Housing Needs Assessment preferred affordable housing tenure mix?

82.1 As already noted above, the evidence in the Viability Appraisal (Submission Document VIA001) was updated in the Viability Appraisal Addendum (Submission Document VIA002) to reflect changes in, or new information about, the tested development assumptions. These included the updating of the average sales values, average build costs and CIL rates to the latest available date, plus new information about the contributions that will be required to meet Policy E8 Cotswold Beechwoods SAC, and further information about the expected average s106 requirements. As noted in VIA002, other than the changed viability testing assumptions that were discussed in VIA002, all other assumptions remained identical to those assumptions that are discussed in VIA002.

82.2 This updating complies with the NPPF paragraph 31, and reflected in PPG on Viability, which states that, *'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.'* The sources used in updating the development assumptions remain the same as the information sources that informed VIA001 and which were discussed with the development industry at that time. These sources primarily include the government's Valuation Office Agency (VOA) house price indexation that is used by the development industry, and the Royal Institute of Chartered Surveyors Build Cost Information Service that is recommended to be used in the PPG on Viability.

- 82.3 As part of this updated work, sensitivity varying of the s106 amounts were used to assess the impact on viability to accommodate the potential increase in County Council requirements, as discussed above. The assessment findings in VIA002 identified that the average s106 contribution may be able to increase from the average at £3,232 per dwelling based on the Council's monitoring data, to £7,500 per dwelling, without putting at risk the delivery of the bulk of proposed housing in the city. This evidence is based on the same approach that was used for VIA001 and, similarly to VIA001, complies with the NPPF and related guidance.
- 82.4 No changes to benchmark land values had been considered since the amount of change in the existing use value of non-residential sites and the minimum premium required to bring sites forward are deemed to have not significantly changed between the testing used in VIA001 and VIA002.
- 82.5 VIA002 also tested the changes in policy assumptions that might require developments to meet the 2020 Local Housing Needs Assessment preferred affordable housing tenure mix, with the results shown in Table A8. This followed the same approach that is used in VIA002 Table A5. The testing in table A8 also reflects the Pre-Submission GCP affordable housing requirement. Also, the 2020 Local Housing Needs Assessment preferred affordable housing tenure mix was sensitivity tested with differing s106 amounts in Table A8. So, in the Council's view, it is not necessary to rerun Tables A5, A6 and A7 using the 2020 Local Housing Needs Assessment preferred affordable housing tenure mix because these sensitivity tests are already reflected in Table A8.

83. What would be the implication on the plan, if the viability evidence clearly demonstrated, on a plan wide basis, that the development proposed in the GCP was not viable?

- 83.1 The evidence, as presented in VIA001 and VIA002, supports the delivery of the Pre-Submission GCP. So based on this evidence, it is considered that the level of development proposed within Gloucester will be viable and deliverable under the full policy requirements of the GCP. This would be based on 'striking a balance' between being 'aspirational' in securing maximum benefits in the public interest at a rate that is higher than afforded by the lowest viability case. But likewise, it does not set any policy requirements so high as to threaten the delivery of the bulk of sites. This approach is in line with the PPG on Viability (as referenced in VIA001 paragraph 2.41), which notes that planning authorities need to '*...strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission.*'
- 83.2 However, should viability propose an issue that is not foreseen by the testing of the pre-submission Regulation 18 City Plan, including sites that come forward within lower value areas or that are deemed to have exceptional circumstances to the market norm, then Policy G8 provides flexibility to meet the full policy requirements within an individual site where viability is found to be an issue. Also, the proposed review mechanism in Policy G8 will enable the Council to review the viability across the construction period to ensure that if viability or circumstances improve, then policy requirements are able to be met to achieve housing delivery and securing maximum benefits in the public interest.

84. What purpose is served by Policy G8 with reference to individual developments and developer contributions?

- 84.1 Policy G8 provides flexibility to enable, in accordance with Paragraph 57 of the NPPF where particular circumstances justify the need for a viability assessment at the application stage, that a mechanism exists whereby viability can be reviewed over time to ensure maximum benefit in the public interest. This accords with the PPG in relation to Viability, which states:

'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.'

Where contributions are reduced below the requirements set out in policies to provide flexibility in the early stages of a development, there should be a clear agreement of how policy compliance can be achieved over time. As the potential risk to developers is already accounted for in the assumptions for developer return in viability assessment, realisation of risk does not in itself necessitate further viability assessment or trigger a review mechanism. Review mechanisms are not a tool to protect a return to the developer, but to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project.'

Paragraph: 009 Reference ID: 10-009-20190509

- 85 Whether the following proposed site allocations, are justified, based on up-to-date evidence, effective, and consistent with national policy?**

- 85.1 Please see Appendix 10A.

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Whether the following proposed site allocations, are justified, based on up-to-date evidence, effective, and consistent with national policy?

Q.85 Various questions relating to the site allocations.

85.1 The City Council's approach to site allocations in the GCP must be consistent with the Adopted JCS and, in particular, policies SP1 & SP2. In summary, these policies set out (our emphasis):

JCS Policy SP1 The Need for New Development

- 1. During the plan period, provision will be made to meet the need for approximately 35,175 new homes and a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs.***
- 2. This is to be delivered by development within existing urban areas through district plans, existing commitments, urban extensions to Cheltenham and Gloucester, and the provision of Strategic Allocations at Ashchurch. This strategy aims to locate jobs near to the economically active population, increasing sustainability, and reducing out-commuting thereby reducing carbon emissions from unsustainable car use.***
- 3. This housing requirement for each local authority will be as follows:***
 - Gloucester at least 14,359 new homes***
 - Cheltenham at least 10,917 new homes***
 - Tewkesbury at least 9,899 new homes***

JCS Policy SP2 Distribution of New Development

- 2. To meet the needs of Gloucester City the JCS will make provision for at least 14,359 new homes. At least 13,287 dwellings will be provided within the Gloucester City administrative boundary, including the Winnycroft Strategic Allocation, and urban extensions at Innsworth and Twigworth, South Churchdown and North Brockworth within Tewkesbury Borough defined in Policy SA1, and sites covered by any Memoranda of Agreement.***
- 85.2 Policies SD1 'Employment – except retail development' and SD2 'Retail and City/Town Centres' and SP10 'Residential development', provide detail on where residential development, employment development and retail development is acceptable.

Site SA01	<u>Land at The Wheatridge</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was historically allocated for a primary school in the Local Plan 2002 (2nd Stage Deposit Local Plan) at Policy CS.9. However, this need went away, and the site was subsequently considered for residential. More recently, in response to demand within the local school places catchment, the need for a new primary school in this area of the city has been identified again and, following engagement with Gloucestershire County Council (land owner and education authority), it was determined that this site is the only opportunity within the area for a new primary school.</p> <p>The land requirements for the school provide some residual land so, in the interests of making the best use of the city's limited land supply, the allocation approximately 10 dwellings.</p> <p>The SALA confirms the site is suitable for residential development, but not employment development, given its location in a built-up residential area.</p> <p>It was deemed to be suitable, available and achievable for use as a school and for residential use if the school option is not required.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The propose use is for a Two Form Entry Primary School plus approximately 10 dwellings.</p> <p>What is the basis for this and is it justified?</p> <p>The proposed allocation and use comes from the County Council as Education Authority and is based on their assessment of the need for school places in the city. They have undertaken work to assess the suitability of the site for a school and the site was originally reserved for use as a primary school when the estate was originally granted planning permission.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>The site has no related planning permissions and there are currently no applications or construction on site.</p>

What are the benefits that the proposed development would bring?

The benefits of the scheme are that primary aged children will have a school to go to which is reasonably close to where they live. Local children who might otherwise have to travel by car or by public transport will have primary education provision within the catchment. The site was also provide a small number of new homes. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The site is in a residential area and is surrounded by housing on all sides. As has been stated, the site was originally reserved and allocated as a site for a school when the estate was originally granted planning permission.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

The site was assessed for potential impacts on heritage assets at the SALA stage – Submission Document (HIS007/i).

There are no scheduled monuments or listed buildings contained within the site. It is not part of a registered park or garden or a battlefield. The site is also not within a Conservation Area. The Historic Environment Assessment report for SALA concluded that development was appropriate provided mitigation was considered at planning application stage. The City archaeologist has reported that an archaeological assessment may be required, but this is a standard response, not because the site is known to be sensitive. This requirement is outlined in the existing site schedule.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

Flood risk on this site is minimal. The sequential and exception tests have not been applied as the site is entirely in Flood Zone 1. It has been assessed at the SALA stage and through the SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b)

What are the infrastructure requirements/costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

The Primary School is a piece of infrastructure that will bring additional education spaces to the city. Other infrastructure elements associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see

Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the City Plan growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available according to recent communications with Gloucestershire County Council as landowners. The proposal has recently been successful in receiving Wave 4 Free School Funding (see Statement of Common Ground with Gloucestershire County Council as Education Authority – reference SoCG6).

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

A new school and the small amount of residential development is expected to be completed within the next two to three years. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

The terminology is consistent and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* –

Submission Document (CD010a) Ref: PM079 and shown as a part of the GCP in <i>Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan</i> – Submission Document (CD010b).

Site SA02	<u>Land at Barnwood Manor</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was submitted to the Council’s Strategic Assessment of Land Availability (SALA) process by the Barnwood Trust who are the owners. Through assessment it was deemed to be suitable, available and achievable for residential development.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The site schedule is clear that the allocation is for approximately 30 dwellings and that this is a reasonable intensification of the site whilst allowing for the nursing home on site to remain fully functional and protecting historic assets in particular the Listed manor house and its setting.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is the SALA methodology on densities, no adverse comments from the SALA Panel, consultation with the Council’s Heritage team and submissions from the site owners outlining the scope of their proposals. The site is located in a predominantly residential area and not suitable for employment.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>On 20th March 2020 permission 19/00672FUL was granted. This is for net 23 dwellings. The demolition of existing housing (23 units) and the redevelopment of the site to provide 46 new build dwellings (16 no. 1 bedroom apartments, 24 no. 2 bedroom apartments, 4 no. 3 bedroom houses and 2 no. 3 bedroom bungalows). As of March 2020, no works had commenced on site.</p> <p>What are the benefits that the proposed development would bring?</p> <p>Development of this site would provide more sheltered housing and improved accommodation in line with the aims and objectives of the Barnwood Trust. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p>

How does the site relate to nearby uses?

Use of part of this site for additional sheltered housing would be appropriate and in-keeping with this site and the wider residential area.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

Potential adverse impacts could include some loss of amenity from a reduction in garden area. Also, potential impacts on the setting of the Listed manor. This is detailed in the Historic Environment Assessment Report for SALA – Submission Document (HIS007/t). Early engagement with the Council’s Heritage team through the SALA process and the application process ensured that impacts could be successfully mitigated.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the parts of the site likely to be developed are entirely in Flood Zone 1. The site schedule states that if development were to be proposed in Flood Zone 2 or 3 then a site-specific Flood Risk Assessment would be required.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 ‘Infrastructure Delivery Plan Addendum’). It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council’s approach towards infrastructure delivery and viability is set out in the ‘Infrastructure and Viability Background Paper’ (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available; in fact, planning permission for net 23 dwellings has recently been granted.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

On 20th March.2020 planning permission 19/00672FUL was granted. Building work is expected to commence in the spring/summer of 2021. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is consistent and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM080 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA03	Former Prospect House, 67 – 69 London Road
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was identified by officers as a disused office block in a prominent location on one of the main routes into Gloucester. It has been assessed as suitable and available and achievable through the Strategic Assessment of Land Availability (SALA) process for residential development. The office blocks have been vacant for a significant period of time, despite marketing. The site represents an opportunity for a higher density scheme in close proximity to the city centre.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>30 dwellings, ideally reusing the existing buildings on site.</p> <p>What is the basis for this and is it justified?</p> <p>The 30 dwellings is based on the SALA site density methodology. The site owners responded to the GCP Reg.19 consultation with a slightly enlarged site area and a suggestion that the site could accommodate around 60 dwellings. The Kingsholm & Wotton Neighbourhood Partnership also made responded to the same affect, that the site could accommodate more dwellings. The Council has agreed that the initial estimate of dwelling capacity was on the low side and has proposed a change to approximately 60 dwellings. See the proposed modification in Submission Document (CD010a) the <i>Schedule of Changes Pre-Submission Gloucester City Plan Addendum</i> Ref: PM082 & PM083 and shown as a part of the GCP in Submission Document (CD010b) <i>Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan</i>. Also Submission Document (CD010c) <i>Appendix 2 Amended Gloucester City Plan Policies Map</i>.</p> <p>With regard to the issue of the reuse of the existing office building, the Council has made this suggestion on sustainability grounds. If the main building (No. 69) is structurally sound and can demonstrate some longevity, given the imbedded carbon within the building, it would seem contrary to sustainability principles to demolish and rebuild. However, this approach should be balanced with the potential opportunity to remove a ‘neutral’ building from the London Road Conservation Area and replace it with something more in-keeping in consultation with Heritage officers.</p>

What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?

The office buildings on site are redundant and becoming increasingly shabby and dilapidated, particularly No. 67. This has been the case for a number of years. There are currently no planning applications with the Council for consideration and certainly no construction on site.

What are the benefits that the proposed development would bring?

The site is currently boarded up on the periphery and the buildings are increasingly dilapidated. Residential development would bring the site into productive use, provide new homes on a brownfield site and improve the appearance of the area. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The site is prominent, on the corner of London Road and Heathville Road. It is in the London Road Conservation Area and historically this was an attractive part of the city with grand houses and villas.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

A detailed Historic Environment Assessment for SALA sites was conducted for this site in 2016 / 2017. See Submission Document (HIS007/f).

The summary from this document is as follows: There are no scheduled monuments or listed buildings contained within the site although there are listed buildings in the vicinity. The site is also not part of a registered park or garden or a battlefield. The site lies within the London Road Conservation Area. The buildings are marked as neutral structures within the Conservation Area Appraisal. Demolition of these structures and replacement with buildings more in-keeping with the surrounding of distinctive 19th century buildings would be an improvement to the Conservation Area and would be an enhancement to the setting of the close listed and historic buildings.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and

costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available according to recent communications with the owners. The site owners confirmed availability in their response to the GCP Pre-Submission consultation.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The expected timescale is completion of the some of the units by 2023/24, with the rest following thereafter. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

On the advice of the agent the boundary has been corrected slightly to include a small part of the back of No 1 Heathville Road. See Submission Document CD010a '*Schedule of Changes Pre-Submission Gloucester City Plan* (reference PM105) and CD010c *Appendix 2 Amended Gloucester City Plan Policies Map* and Submission Document

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM081 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA04	<u>Former Wessex House, Great Western Road</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>This small site, close to the station has been redundant for a number of years and is a prime site for regeneration. It is owned by the City Council. It has been assessed as suitable, available and achievable through the Strategic Assessment of Land Availability (SALA) process for residential development. The site offers the opportunity for higher density residential development adjacent to the city centre and the bus and rail interchange. The site is small and not considered suitable for employment development. The Council’s ‘Strategic Options for the Gloucester Economy 2017’ (Submission Document EE002) identifies that stakeholders do not consider there to be a market for employment sites along Great Western Road/Railway corridor.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>Approximately 20 residential dwellings or temporary accommodation or mixed uses.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is the SALA site density methodology and information provided by the City Council as the owner of the site. 20 dwellings is an approximate figure and the density could be higher with an appropriately designed scheme, in accordance with Policy A1. The allocation aims at a degree of flexibility recognising the site could accommodate a number of uses or mixed uses.</p> <p>The site has been assessed as suitable, available and achievable through the Strategic Assessment of Land Availability (SALA) process. Within the Regeneration and Economic Development Strategy (Submission Document OTH003), this site falls within the Objective 3 ‘Small sites’, to ‘Develop and continually review a priority list of sites and buildings which will be targeted for action, working with the property owners, to assist them to regenerate those properties using all the tools at their disposal.’</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p>

The previous use of the site was electrical retail/wholesale, but this was a number of years ago. The large building on site (the former Edmundson Electrical) has been demolished. The permission to demolish was issued on 15.11.2019 (19/01120/DEM).

What are the benefits that the proposed development would bring?

The site has long housed an ugly derelict building. It is now a clear, vacant site. The appropriate development of the site would bring benefits in terms of Gloucester's housing supply or meeting emergency or temporary accommodation needs. The development of the site would also improve the look and feel of the area providing surveillance and an added sense of security close to a notoriously dingy underpass leading from Great Western Road to the railway station. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The site backs on to the railway station. As you face the site from the street, on the right is the underpass and a large building used by Gloucester Foodbank and on the left is the station car park. Opposite the site are NHS dialysis buildings. The use if appropriate in the context of the wider area.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

Adverse impacts are not anticipated and developing the site will improve the locality. There are no built heritage assets on site or in proximity, but the site is an area of archaeological interest and investigations may be required with an application.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see

Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available, and it is owned by the City Council. Recent work has been undertaken to produce a development brief for the site.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

It is likely that the site will be developed in the next year or two and the City Council are actively working on options for the site. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is consistent and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM084 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA05	<u>Land at Great Western Sidings</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>This site was identified by the Gloucester Heritage Urban Regeneration Company (GHURC) as a key brownfield site. Confirmation was received about availability from Network Rail and the site has been assessed as suitable and available and achievable through the Strategic Assessment of Land Availability (SALA) process. The site offers the opportunity for substantial higher density residential development in close proximity to the city centre and the bus and rail interchange. The site is small and not considered suitable for employment development. The Council's 'Strategic Options for the Gloucester Economy 2017' (Submission Document EE002) identifies that stakeholders do not consider there to be a market for employment sites along Great Western Road/canal corridor.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>As detailed in the policy/site schedule, approximately 200 dwellings are expected on this site with green space and good walking and cycling routes to the city centre.</p> <p>What is the basis for this and is it justified?</p> <p>This is a good site for housing on a very well-located site which has been redundant for many years. Its development will bring significant improvements to the area. The basis of the 200 dwellings is the SALA site density methodology and an understanding, as stated at para 3.1.7, the supporting text to Policy A1: <i>Effective and efficient use of land and buildings</i> that higher densities may be more appropriate in sites that are near to the bus and rail interchange and the city centre. The density also reflects the nearby housing on the corner of Great Western Road and Horton Road.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>There are no planning permissions related to the site and there is no construction. Network Rail have sold the site and the Council expects an application from a developer in the coming months; expected by the summer of 2021.</p> <p>What are the benefits that the proposed development would bring?</p>

The development would provide a substantial number of new homes, including affordable housing, on a vacant brownfield site in the city. It is likely that the development will be particularly popular with hospital workers being so close to the main entrance of Gloucestershire Royal Hospital. There will be new 'green' walking and cycling routes down Great Western Road towards the city centre will be created. The site schedule requires meaningful and useable open space and increased tree coverage. The policy includes requirements to include and improve an adjacent area of open space (Great Western Road Rest Gardens - see Submission Document HW017 'Gloucester Open Space Background Note') and creation of a new strategic cycle and footway link to the city centre and transport hub. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The site is currently redundant railway land and the active railway line runs to the south of the site. Nearby uses are terraced as well as higher density flatted housing on Great Western Road, a large hospital car park and other buildings. To the south east of the site is the Horton Road railway crossing. The Gloucester Irish Club and its car park lies to the east of the site and behind this is Allstone Sand and Gravel which processes recycled aggregates.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

There are no significant adverse impacts anticipated; the area should be significantly improved through a good scheme. There is a non-designated heritage asset on site, a historic engine shed (non-designated heritage asset), and appropriate mitigation will be required on submission of a planning application.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2- Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been

updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available, and the Council expects a planning application possibly by late summer 2021. Network Rail as site owners submitted a response to the GCP Pre-Submission consultation and confirmed the site's availability.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The first dwellings could be complete by 2023/24 or potentially sooner. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the Council is satisfied that the terminology is consistent and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM085 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA06	<u>Blackbridge Sports and Community Hub</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site is allocated as a sports and community hub. It was identified as a significant opportunity in the adopted Gloucester Playing Pitch Strategy 2015 - 2025 (Submission Document HW010) and Artificial Grass Pitch Strategy (Submission Document HW015), serving communities in the south of the city and in one of the most deprived wards. The site has been assessed as suitable and available and achievable through the Strategic Assessment of Land Availability (SALA) process. There are no alternative options for this type of facility in this part of the city. The delivery of the Blackbridge Sports and Community Hub is an important element of the Council Plan (Submission Documents OTH002 and OTH002a).</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>Uses and facilities proposed are: Multi-use sports, physical activity and community activities, grass playing fields, 3G artificial pitch, health and wellbeing facility</p> <p>What is the basis for this and is it justified?</p> <p>The basis is an identification of need in this part of Gloucester in the adopted Gloucester Playing Pitch Strategy and Artificial Grass Pitch Strategy.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>No planning applications on site and no permissions, completions or construction activity.</p> <p>What are the benefits that the proposed development would bring?</p> <p>Major health and wellbeing benefits are anticipated for residents who will use this facility, including those in the ward the site is located, Podsmead, which is one of the most deprived in the city. The site will support physical activity and more active lifestyles for Gloucester residents and others. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p>

Because of the nature of the development proposed it is very unlikely that there will be conflicts with nearby uses. The site is large enough to accommodate the proposed facilities without a significant adverse impact on the amenity of neighbouring properties.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

Any minor adverse impacts will be greatly outweighed by the positive benefits to the community. There are no built heritage assets on sight and the City archaeologist has confirmed that significant archaeology is not known in this area.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a low risk of flooding on this site as it is entirely within Flood Zone 1. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). As stated in the site schedule, surface water runoff from the site could potentially contribute to flood risk in the downstream catchment. Redevelopment provides the opportunity for flood risk mitigation for the wider area. Any development should therefore implement a robust Sustainable Drainage System.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Given the nature of the development which will be providing community and sport infrastructure, there are no additional infrastructure costs identified within INF001 Gloucester Infrastructure Delivery Plan.

Is the site available, realistically viable and deliverable?

Yes, the site is available according to recent and ongoing communications with the owners – the County Council.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

	<p>Development is expected to commence within the next one to two years. Regular meetings of the Blackbridge Community Land Trust (who are overseeing the development of the project) are taking place, with day to day support from Active Gloucestershire.</p> <p>Is the boundary of the site appropriate? Is there any justification for amending the boundary?</p> <p>Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.</p> <p>Is the terminology used within the relevant site-specific policy consistent and clear?</p> <p>Yes, the wording is clear and consistent.</p>
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Site SA07	<u>Lynton Fields, Land East of Waterwells Business Park</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site, as part of a wider parcel known as 'Land East of Waterwells Business Park' was an Employment allocation in 2nd Stage Deposit Local Plan - Policy E.2.5. The site was also consulted on in the GCP Sites Consultation 2013, where four different development options were considered. It is identified in the SALA as suitable, available and achievable for employment uses and represents a natural extension (and the only remaining land) to the very successful Waterwells Business Park. Further information is provided in the 'Employment Background Paper', September 2019 (Submission Document EE001), 'Strategic Options for the Gloucester Economy' (Submission Document EE002) and 'Gloucester City Employment Land Review' (EE009). The site is not considered suitable for residential purposes given the presence of industrial uses to the west and car storage to the east.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>B class employment development.</p> <p>What is the basis for this and is it justified?</p> <p>The site is located to the east of Waterwells Business Park and represents a logical extension to this employment area.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>The current use of the site is improved grassland and buildings related to the poultry farming and small-scale industry. The most recent permission is for a rear extension to a workshop (12/00058/FUL).</p> <p>What are the benefits that the proposed development would bring?</p> <p>The use of the site for employment development would provide for the needs of new and established businesses in Gloucester and the site is a logical extension to the very successful Waterwells Business Park. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p>

How does the site relate to nearby uses?

There are car storage facilities to the north and east, industrial buildings to the west and four large Victorian villas to the south.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

There are no potential adverse impacts that could not be successfully mitigated. In terms of heritage assets, there are no built heritage assets on site, but an archaeological assessment would be required with any application. The site has been assessed through a Site Historic Environment Assessment for SALA – Submission Document (HIS007/c) and the conclusion is that the site is developable with appropriate mitigation.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

The site is entirely in Flood Zone 1. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The site schedule clearly indicates the assessments required with any application for flood mitigation and SuDS.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

There are no specific infrastructure costs identified in INF001 Gloucester Infrastructure Delivery Plan. The JCS IDP provides much of the wider infrastructure needs for the City Plan growth.

Is the site available, realistically viable and deliverable?

At the GCP Reg 19 consultation, this site was allocated on the basis that the site owner had been contacted and had indicated that the site was available for employment development. The site is certainly suitable and viable for this use. However, responding to the Reg 19 consultation the owner of the site has stated that the site is now not available for employment development and is now promoting a residential allocation.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The expected timescale for employment development is within the next five years, but it depends on the aspirations of the landowner.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, it is correct and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM086 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA08	<u>Kings Quarter</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>Kings Quarter has long been identified as a site for regeneration e.g. through the Gloucester Heritage Urban Regeneration Company (GHURC). As a key city centre regeneration site and a Council priority, with Kings Square at the centre. King’s Quarter represents the City Council’s primary regeneration priority, as set out in the adopted ‘Regeneration and Economic Development Strategy’ (Submission Document OTH003). Objective 1 ‘Delivering major development sites’, criterion (i) states ‘Kings Quarter Regeneration Scheme: delivering the step-change in the city centre, to include retail and leisure components that reflect the aspirations of a modern city’.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>Mixed use development, residential, retail, employment, hotel and leisure use and city centre parking. The City Council has not specified proportions in terms of the mix of uses, as this site required flexibility to be able to respond to the market at the time of the application.</p> <p>What is the basis for this and is it justified?</p> <p>The proposed uses are suitable for a site in real need of substantial regeneration. The uses proposed are viable city centre uses that will attract visitors, shoppers and new residents leading to a vibrant city centre, linked to an improved public transport interchange.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p><u>(15/01142/FUL) and (17/00622/FUL - variation)</u> Demolition of buildings, tree removal and redevelopment of site to provide a new bus station, highways and access works, landscaping and associated infrastructure works including provision of emergency staircase on existing NCP car park.</p> <p><u>(18/01454/FUL)</u> Hybrid Planning Application for the redevelopment of Kings Square and land known as Kings Quarter, Gloucester seeking:</p>

(i) Full planning permission for:

Public realm works, access and parking alterations, landscaping and associated infrastructure improvements and demolition of structures at Kings Square, The Oxebode and St Aldate Street; and the demolition of existing buildings and structures and the creation of a mixed use development comprising development blocks 1, 2, 3a and 3b to provide; a new multi-storey car park (sui generis); residential dwellings (C3) (101 units); commercial retail (A1,A2) / food and drink (A3,A4) / office space (B1); refurbishment of Kings House to provide a new creative hub (B1) with ancillary exhibition space (D1) and food-hall (A3); and associated access, utilities infrastructure, substation relocation, highway works, wider public realm and landscaping works on land at Northgate Street, Spread Eagle Road, Market Parade, Station Road and Bruton Way.

(ii) Outline planning permission for:

The demolition of existing buildings, structures and multi storey car park and the development of proposed blocks 3c, 3d and 4 comprising residential development (C3) (up to 55 units), commercial/retail space (A1,A2,A3,A4, B1), hotel (C1) and office space (B1) with all matters reserved except for access on the land at Spread Eagle Road, Market Parade and Bruton Way.

(20/01286/FUL)

Committee Resolution to Permit subject to S.106 agreement (6th April 2021).

Full planning permission for the demolition of existing buildings and structures (Grosvenor House) and the creation of mixed use development comprising two blocks; one with commercial, business and service floorspace (E Class), hotel (C1 Class) and multi-storey car park (sui generis), and the other comprising commercial, business and service floorspace (E Class); both with associated access, parking, cycle and bin storage, utilities infrastructure, highways works, public realm and landscaping works on land fronting Market Parade, Station Road and Bruton Way (forming plot 2, plot 4 and associated public realm and highways works of previous consent 18/01454/FUL for the redevelopment of Kings Quarter).

What are the benefits that the proposed development would bring?

There are numerous benefits, including: regeneration of a key city centre brownfield site, substantially improved linkages with the bus/rail interchange, increased economic activity, increased footfall and visitor numbers (improving vitality and viability of the primary shopping area and wider city centre), new homes, new open spaces with environmental improvements, new links to sustainable transport nodes. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

This is a large city centre site with residential to the south (Clarence Street, Russell Street & Whitfield Street), the railway station to the north east and back of retail/parking to the north west. Significant nearby buildings are Twyver House which is a Regional Land Registry and Debenhams immediately off Kings Square.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

The development of this site will bring significant benefits to the city and any potential adverse impacts will be limited and mitigated. In terms of potential adverse impacts on heritage assets,

these have been assessed by the Council's heritage team through the SALA process, through the recent planning applications and in broad accordance with the Adopted Concept Statement for Kings Quarter.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

Significant parts of the site now have planning permission and the risk of flood risk has been determined and mitigated. For allocation purposes, flood risk has been assessed through consultation with flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 (Submission Document (NAT004). As residential development is proposed, and parts of the site are in Flood zones 2 and 3 the site sequential test was applied and passed. See Submission Document (NAT005).

On flood risk the site schedule currently states: "A site-specific Flood Risk Assessment is required if any development is located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.

There is a requirement for assessment and implementation of SuDS in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019).

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

The necessary infrastructure for this site was secured through the planning application and s106.

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time

of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available, planning permissions have been granted and construction work is underway.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

Gloucester's new bus station has been completed, and construction work is underway on Kings Square. The full regeneration of Kings quarter will take place over the next 2 to 3 years. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, it is correct and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM087 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

SA09	Former Quayside House, Blackfriars
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was proposed for allocation by the County Council. It has been assessed as suitable, available and achievable through the Strategic Assessment of Land Availability (SALA) process. Part of the site is to be brought forward for a mix of employment uses (to provide for the County Council’s functional needs), a substantial health centre with associated pharmacy and residential dwellings. The site represents an opportunity for higher density development in the city centre. The health centre is strongly supported by the Gloucestershire Clinical Commissioning Group and this is reflected in their response to the GCP Pre-Submission consultation.</p> <p>The site is included as part of the wider Blackfriars site in the Council’s adopted Regeneration and Economic Development Strategy (Submission Document OTH003). Objective 1 ‘Delivering major development sites’, criterion (ii) states ‘Blackfriars project, including for former Fleece Hotel – regenerating this large brownfield site to provide vibrant mixed-use employment, residential, leisure, open space and parking development, thereby creating a seamless linkage between the historic docks and the city centre, including the regeneration of historic Fleece Hotel site’.</p> <p>The wider Blackfriars site is now subject to completed development and consents for student accommodation and residential development. The Fleece Hotel and Longsmith Street Car Park is allocated under Policy SA10.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>As stated on the site schedule the proposed uses include B1 offices, a combined GP practice, a pharmacy as well as residential development.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is productive use of the site by the County Council and reflecting specific needs for a health centre in the city centre to provide for the needs of an increasing number of residents living in the city centre (for example through regeneration proposals such as Baker’s Quay and Monk Meadow). The allocation accords with the principles set out in the Council’s adopted Regeneration and Economic Development Strategy for the wider Blackfriars site.</p>

What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?

The site has a recent planning permission ref: (19/00754/DCC & 19/0045/GLR3MJ) for the erection of one three-storey building to comprise 2 general practitioner surgeries associated pharmacy (Use Class D1), and open plan office space (Use Class B1) and ground floor parking. Construction is very well progressed. Phase 2 will comprise a residential element, but that is not yet permitted.

What are the benefits that the proposed development would bring?

The benefits are the productive use of an underutilised brownfield site in the centre of Gloucester and the provision of additional and improved office accommodation for the City Council, the creation of a central hub for GPs surgeries could allow for various smaller surgery buildings in different wards in Gloucester to be repurposed, and new homes. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The site relates very well to the existing Shire hall buildings which are the main County Council offices. To the south of the site is the former Gloucester prison which has permission for c.200 dwellings. These two large sites are well related and there is no conflict or mismatch of uses.

What are the potential adverse impacts of developing the site, including to heritage assets? How could they be mitigated?

The potential impacts on heritage assets have been addressed through the recent planning application and conditions.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

As stated, the site now has planning permission and the risk of flood risk has been determined and mitigated. However, phase 2, the residential element, has not been determined yet. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2. The site is close to the River Severn and parts of it are in Flood zones 2 and 3. In allocating the site the sequential test was applied and passed. See Submission Document (NAT005).

On flood risk the site schedule currently states: "A site-specific Flood Risk Assessment is required if any development is located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered. There is a requirement for assessment and implementation of SuDS in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019).

To boost flood protection and on the advice of the EA see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM088 and shown as a part of the GCP in Submission Document CD010b *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

The site is providing infrastructure in the form of healthcare facilities.

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, this County owned site is available and phase 1 of permission 19/00754/DCC & 19/0045/GLR3MJ is almost complete.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

Phase 1 is almost complete and the first completions of residential accommodation on site could be in 2023/24 or sooner. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is consistent and clear.

In addition to the answers above see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum Ref:* and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan.*

SA10	Former Fleece Hotel and Longsmith Car Park
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site is owned by the City Council which has had the intention of bringing it into productive use for many years. The site has been assessed through the SALA process including the Panel and is considered to be suitable available and achievable. To support its delivery, the City Council adopted a Planning Concept Statement in 2012.</p> <p>The site is included as part of the wider Blackfriars site in the Council’s adopted Regeneration and Economic Development Strategy (Submission Document OTH003). Objective 1 ‘Delivering major development sites’, criterion (ii) states ‘Blackfriars project, including for former Fleece Hotel – regenerating this large brownfield site to provide vibrant mixed-use employment, residential, leisure, open space and parking development, thereby creating a seamless linkage between the historic docks and the city centre, including the regeneration of historic Fleece Hotel site’.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>Mixed use development, residential (approximately 25 units) and other main town centre uses. The City Council has not specified proportions in terms of the mix of uses, as this site required flexibility to be able to respond to the market at the time of the application. Council expects very sensitive treatment of the historic buildings on site allied with a range of main town centre uses.</p> <p>What is the basis for this and is it justified?</p> <p>The basis for this is the adopted Concept Statement of 2012 and the Council’s aspirations to improve and reinvigorate this important part of the city centre. To restore and bring into active and viable use of the most important heritage assets in the city in a way that contributes to the vitality and viability of the city centre.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>There are currently no planning applications or permissions related to the site and there is no construction.</p>

What are the benefits that the proposed development would bring?

Successful regeneration of the site would bring huge benefits such as:

- Preserving and showcasing an important part of Gloucester’s history which is currently hidden away.
- Supporting vitality and viability in this part of the city centre.
- Providing new homes in the city centre as well as retail / cultural opportunities.

Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The site is constrained on all sides by dense urban development. To the north the frontage is onto Westgate Street. To the south is Longsmith street and open-air car parks. To the west (off Bull Lane) is a very large telephone exchange building and to the east the site is bounded by the backs of the banks and retail on Southgate street.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

The site contains very significant heritage assets. At the heart of the complex is a Grade 1 Listed 15th Century timber framed inn above a 12th Century masonry undercroft. Sensitive development of the site will ensure the preservation of these assets, whereas currently they are potentially deemed to be at risk of further deterioration if the site is not productively used. Assets will be preserved by reference to the City Council’s Concept Statement.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2. The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see

Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, this City Council owned site is available and there are ongoing talks with a preferred developer who has significant experience in bringing forward similarly sensitive sites.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The current trajectory for City Plan sites indicates that development could commence in 2023/24. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, it is consistent and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM089 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA11	<u>Land at rear of St Oswald's Retail Park</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>This large brownfield site close to the city centre has been redundant for a number of years and is a prime site for regeneration. The freehold is owned by the City Council with a third party having an option on a third of the site, and Tesco having a leasehold on another third. The option has now been removed, and negotiations are ongoing with Tesco regarding the leasehold.</p> <p>The site has been assessed as suitable, available and achievable through the Strategic Assessment of Land Availability (SALA) process. Within the Regeneration and Economic Development Strategy (Submission Document OTH003), this site falls within the Objective 3 'Small sites', to 'Develop and continually review a priority list of sites and buildings which will be targeted for action, working with the property owners, to assist them to regenerate those properties using all the tools at their disposal.'</p> <p>It represents an opportunity, in close proximity to the city centre, to deliver a high-density scheme, in-keeping with the density of the adjacent older persons accommodation and wider development to the rear of the retail park.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England (Ref: SoCG1) and Gloucestershire County Council Highways Authority (Ref: SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>A major housing scheme of about 300 dwellings is proposed. The development will be an appropriate mix of market and affordable housing.</p> <p>What is the basis for this and is it justified?</p> <p>This site is owned by the City Council. A significant quantum of housing delivered on this site would greatly assist in meeting housing needs in the city, in a location that is close to the city centre and bus/rail interchange. The NPPF strongly encourages the development of brownfield sites and this site is one of the largest and most centrally located in Gloucester. The proposed</p>

capacity/density aligns with those delivered on neighbouring sites, wrapping around the rear of St Oswalds Retail Park.

What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?

The majority of this large site has no planning status. The one extant permission on part of the site is (11/00873/FUL) *Redevelopment comprising demolition of existing buildings on site and their replacement with a new Class A1 foodstore and Class A1 non-food retail store(s); relocated petrol filling station; car wash; new access arrangements; car parking and landscaping.*

What are the benefits that the proposed development would bring?

The site has long been redundant with no productive use. The appropriate development of this large brownfield site would bring benefits to Gloucester in terms of providing new homes, including affordable homes, and successful regeneration would greatly improve the area. The allocation also required the provision of new public open space to address an identified shortfall in the local area (see Submission Document HW017 'Gloucester Open Space Background Note'). Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The site is bordered by the railway line to the south which separates it from Westgate park and The Kings' school playing fields. To the north is B&Q retail, sheltered housing for older people and the small and fairly new residential area at Dexter Way and Longhorn Avenue. To the east is open meadow land bounded by River Severn and to the west is a large Tesco supermarket with car parks.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

It is likely that the benefits of developing the site will significantly outweigh any adverse impacts and the planning process will ensure that appropriate management and mitigation will take place. In terms of potential adverse impacts on heritage assets, these have been assessed by the Council's heritage team through the SALA process. The Heritage Team consider that there are no built heritage concerns and the City Archaeologist has stated: "It is assumed that this site is situated on historic landfill. If this can be confirmed, then no archaeological conditions would be required. If however the site proves not to be on landfill, then archaeological evaluation (and potentially mitigation) would be required by condition."

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

For allocation purposes, flood risk has been assessed through consultation with flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2. As residential development is proposed, and parts of the site are in Flood zones 2 and 3 the site sequential test was applied and passed. See Submission Document (NAT005).

On flood risk, the site schedule currently states: “A site-specific Flood Risk Assessment is required if any development is located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.

There is a requirement for assessment and implementation of SuDS in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019). In addition, on the advice of the EA, the Council have agreed to include a further site requirement related to surface water flooding and ground contamination. See the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM091 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 ‘Infrastructure Delivery Plan Addendum’). It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council’s approach towards infrastructure delivery and viability is set out in the ‘Infrastructure and Viability Background Paper’ (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, recent negotiations with Tesco Stores Ltd over a part of the site on which they hold a long lease are ongoing. There is a City Council Cabinet decision to dispose of the site to interested parties / housing providers. [Further information is available on the City Council’s website.](#)

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in

Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The current trajectory for City Plan allocations indicates that the first delivery of homes on site could be in 2022/23. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is consistent and clear.

In addition to the answers above, on County minerals & waste matters, including historic land contamination, see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM090 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA12	<u>Land at Rea Lane, Hempsted</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was submitted to the SALA by an agent on behalf of the landowners as a potential site for housing. The site was found to be suitable for residential development through the SALA process, but not suitable for employment uses, given its location with predominantly residential area. The site is located outside of the defined Cordon Sanitaire (see Policy C6).</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England (Ref: SoCG1) and Gloucestershire County Council Highways Authority (Ref: SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The proposed use is for approximately 30 dwellings.</p> <p>What is the basis for this and is it justified?</p> <p>The site has been assessed as a suitable site for housing and will assist in meeting housing needs in the city. The basis of the c.30 dwellings is the SALA site density methodology including landscape considerations.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>The site has a recent planning permission for 33 dwellings. (19/00068/FUL). There is currently no construction on site. The increase in capacity demonstrates the positive application of Policy A1 in making the most efficient and effective use of land.</p> <p>What are the benefits that the proposed development would bring?</p> <p>The development will assist in meeting housing needs in Gloucester and specifically in Hempsted Village. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p>

The site is on the edge of Hempsted village but to the north and the east are existing residential properties.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

The site was assessed by the Council's Heritage Team through the SALA process and the following comments were offered: 'The impact on Hempsted Conservation Area needs to be considered and archaeological investigation will be required.' Clearly the site has been appropriately assessed through the recent planning application process.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site has a recent planning permission for 33 dwellings. (19/00068/FUL).

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

It is possible that the first dwellings could be completed on site by the spring/summer of 2023. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate and there seems no justification for an amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, it is clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM092 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA13	<u>Former Colwell Youth and Community Centre</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was identified by City Council officers as part of the SALA process. It was identified as a large redundant building with the potential for upgrading or repurposing. One of the main reasons for allocation is to see an improvement in the built environment of the neighbourhood in which it is located. The building is not in use, in disrepair and has attached various forms of anti-social behaviour.</p> <p>The site has been assessed as suitable and available and achievable through the SALA process for residential development. It represents an opportunity for a small but important contribution to residential development, in a residential area, on a brownfield site.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England (Ref: SoCG1) and Gloucestershire County Council Highways Authority (Ref: SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>Approximately 20 dwellings are proposed on this site and the Council consider that the building should be retained and converted.</p> <p>What is the basis for this and is it justified?</p> <p>The site has been assessed as a suitable site for housing. Development will assist in meeting housing needs in the city and significantly improve the look and feel of the local neighbourhood. The basis of the c.20 dwellings is the SALA site density methodology.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>There are currently no planning applications or permissions related to the site and there is no construction.</p> <p>What are the benefits that the proposed development would bring?</p>

The main building on site is currently boarded up and the site, including the car park at the rear, has been subject to antisocial activity and fly-tipping. Residential development on this brownfield site would bring the site into productive use, restore a fine-looking building, provide new homes in the city and significantly improve the appearance of the area. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

The proposed use will relate well to nearby uses which is predominantly a residential area. To the north of the site is the elevated Metz Way and beyond that the railway line with the Horton Road level crossing. To the south is the 'Colwell Arts Centre' which is still in use and the sister building to the 'Colwell Youth and Community Centre'. There are residential properties to the east and west of the site.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

The site has been assessed through the SALA process and Council Heritage colleagues have been consulted. In terms of built heritage the following comments have been offered: "The Colwell Centre – This building is recommended for the Local List within the draft Townscape report for the City, the building was originally constructed as Derby Road Council School in 1905-1907 designed by J Fletcher Trew. It is recommended that a built heritage assessment of significance and character assessments are undertaken as part of any forthcoming application." There are no significant issues from an archaeological point of view, but any application may warrant a condition.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to

note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available according to recent communication with the site owner.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The current trajectory for City Plan sites indicates that delivery on site could take place in 2023/24. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

The terminology is consistent and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM093 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA14	<u>Land off New Dawn View</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site is owned by the County Council and it was submitted to the SALA process as a potential site for residential development. The site can only be accessed through an existing residential area (New Dawn View).</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England (Ref: SoCG1) and Gloucestershire County Council Highways Authority (Ref: SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>Approximately 30 dwellings.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is the SALA site density methodology and information provided by the County Council as the owner of the site.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>This a green field site and there are no planning applications, permissions or completions on site.</p> <p>What are the benefits that the proposed development would bring?</p> <p>The development of the site would help to meet housing needs in Gloucester. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p> <p>The site relates well to nearby uses, with new residential to the north, the railway line running down the eastern boundary and sports pitches to the south and west.</p>

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

The heritage team have assessed this site through the SALA process and have indicated that there are no Built heritage or archaeological concerns.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, recent communications with the site owner, the County Council have confirmed that the site is available.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although

the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The current trajectory for City Plan allocations indicates that houses could be delivered on site between 2021/22 and 2022/23. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, it is consistent and clear.

Site SA15	<u>Land South West of Winneycroft Allocation</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The land was submitted to the SALA process for assessment by an agent for the owner. It was assessed, including through the SALA Panel, as suitable, available and achievable. Given its location in a predominately residential area, the site is not considered appropriate for employment development. The allocation provides the opportunity to deliver residential development alongside the Winneycroft strategic allocation.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England (Ref: SoCG1) and Gloucestershire County Council Highways Authority (Ref: SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The proposal is for approximately 30 dwellings and an appropriate percentage of these will be affordable as per policy requirements.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is the need for housing in Gloucester, the close proximity of a large volume of housing to the north i.e. the Winneycroft JCS allocation and the SALA site density methodology.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>Apart from one property, the site is currently open land. There are no applications, permissions or construction activities.</p> <p>What are the benefits that the proposed development would bring?</p> <p>The development will assist in meeting housing needs in Gloucester and link well with the strategic allocation to the north. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p>

The site will relate well with the significant volumes of housing permitted to the north and east of the site. It also relates well to existing residential areas, in Matson Estate off Sneedhams Road.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

There is a loss of greenfield land, but this loss has to be balanced against the need for housing in Gloucester and is deemed appropriate given the proximity of the strategic housing allocation to the north. In terms of impacts on heritage assets, the Council's heritage team have provided the following comments to inform the SALA assessment and the allocation:

On Built heritage: Due to the location in close proximity to scheduled monument this will require a desk-based assessment to review relationship of site with the moat and review setting implications and whether a scheme can be accommodated without impacting on the moated site which is a schedule monument.

On archaeological matters: Significant heritage assets of archaeological interest are recorded in the area around this site; these include an Iron Age/Romano-British settlement to the south east and a medieval moated site to the south west. Any application for development would need to be supported by an archaeological desk-based assessment and by the results of an archaeological evaluation (trial trenching supported by geophysical survey).

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

To boost flood mitigation measures and on the advice of the EA see the proposed modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM094 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see

Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available, and this has been confirmed through recent communications with the agent for the owner and through his submission at the Reg 19 consultation.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

According to trajectory for City Plan sites, the first houses could be built on site in 2022/23. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

The Council considers that the specific Heritage requirements could be made clearer in the policy.

In addition to the answers above see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA16	<u>Land off Lower Eastgate Street</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was submitted to the SALA by the agent/owner and has been assessed as suitable, available and achievable for residential development. The site is not considered suitable or attractive to the market for employment uses.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>This is a small urban infill site for approximately 15 dwellings. These are likely to be flat/apartments.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is the current character of the area and the SALA density methodology.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>The frontage of the site is 114 to 118 Eastgate Street. The current permission is ‘Change of use from use class A3 American diner to use class D1 Children's Day Nursery with A3 use retained to the street front section of the building for the creation of a paint your own pottery cafe (retention of soft play centre at rear of site).’ There are currently no further applications on this site and no construction.</p> <p>What are the benefits that the proposed development would bring?</p> <p>The proposed development of this brownfield site would provide new homes, including affordable housing, in this part of Gloucester and improve the vitality of the city centre. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p> <p>The site and the proposal for dwellings relates well to the existing area which is residential and commercial. There are nightclubs and fast-food outlets in the area and the site schedule makes</p>

clear that proposals will have to be carefully designed to ensure compatibility. Also, any development will have to ensure that it is not overbearing and sensitive to existing properties along Kings Barton Street.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

Significant adverse impacts are not anticipated but these will be mitigated at the planning application stage. In terms of heritage assets, the following comments were offered by the Council's Heritage team as part of the SALA and allocation process:

Located within Eastgate and St Michaels Conservation Area where there are numerous listed buildings and therefore setting concerns regarding massing and capacity of development. No objections to loss of building itself but development would need to be in keeping with character and appearance of conservation area and therefore be low scale development.

This site is located within a large Roman cemetery which extends along the frontage of Eastgate Street. Thus far two inhumations have been found in the immediate proximity of the site and it is likely to contain many more. The recent development on Kiln Close off Brunswick Road exposed part of the same cemetery and is probably a good example of very similar archaeological conditions. Any application would need to be supported by an archaeological desk-based assessment and an archaeological trial trench evaluation.

These requirements are outlined in the policy site schedule.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

For allocation purposes, flood risk has been assessed through consultation with flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). As residential development is proposed, and parts of the site are in Flood zones 2 and 3 the site sequential test was applied and passed. See Submission Document (NAT005).

On flood risk the site schedule currently states: "A site-specific Flood Risk Assessment is required if any development is located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.

There is a requirement for assessment and implementation of SuDS in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019).

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available according to the SALA assessment and according to communication with the site agent/owner. However, this would be in years 6 to 11 and not 1-5.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The current trajectory for City Plan sites indicates that delivery of dwellings could start in 2025/26. It comes in the 6-10 year delivery bracket as opposed to 1-5 year. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is consistent and clear.

	<p>In addition to the answers above, on County minerals & waste matters, see the proposed modification in Submission Document (CD010a) the <i>Schedule of Changes Pre-Submission Gloucester City Plan Addendum</i> Ref: PM095 and shown as a part of the GCP in Submission Document (CD010b) <i>Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan</i>.</p>
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Site SA17	Land South of Triangle Park (Southern Railway Triangle)
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was identified through the SALA process and Network Rail confirmed its availability for employment uses in the medium term. The location and accessibility of the site make it suitable for employment development, linked with the development on the northern triangle, which have proven very successful. Further information is available in the Employment Background Paper (Submission Document EE001), ‘Strategic Options for the Gloucester Economy’ (Submission Document EE002) and Gloucester City Employment Land Review (Submission Document EE009) for further information.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The allocation is for B1/B8 uses.</p> <p>What is the basis for this and is it justified?</p> <p>The proposed use is on the basis of Gloucester’s need and communications with Network Rail regarding their medium to long terms plans for the site. Decisions are also informed by the recent success of the adjacent Triangle Park.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>The current use is railway land/sidings and there are no planning applications, permissions or construction activity on site.</p> <p>What are the benefits that the proposed development would bring?</p> <p>‘Triangle Park’ to the north of this allocation has been developed very successfully over the past few years. It now hosts a range of businesses serving the city. It is envisaged that this ‘southern triangle’, adjacent to the northern one, will serve a similar function. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p>

As a 'railway triangle' the site is bounded by the railway line on all sides. As such residential development would not be appropriate on this site, but certain employment and/or light industrial uses would. To the west lies compact residential neighbourhoods in Barton & Tredworth ward. To the north is the employment area of 'Triangle Park' which hosts, amongst other businesses, a large Morrison's supermarket, a commercial van sales centre and a large self-storage facility. To the east, are the backs of various waste and recycling uses on eastern avenue.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

In terms of adverse impacts on heritage assets, the Council's Heritage team have assessed the site through the SALA process and stated that there are no Built heritage issues or concerns. In terms of the archaeology the following comments were submitted: *This site is obviously formed by the curve of the railway junction. Whereas today there are a fairly limited number of rail lines, historically there were a far larger number of rail tracks in this area and a very large number of sidings. The site also contained a number of ancillary structures. These potentially survive below ground as industrial archaeological remains – which would be of local significance. Any application would need to be supported by a desk-based assessment and potentially a (trial trench) evaluation.*

The requirement for an Archaeological Assessment is already outlined in the site schedule.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1 and vulnerable uses are not proposed.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

There are no specific infrastructure costs identified in INF001 Gloucester Infrastructure Delivery Plan. The JCS IDP provides much of the wider infrastructure needs for the City Plan growth.

Is the site available, realistically viable and deliverable?

Yes, according to recent email communication with Network Rail the site will be available in the medium term and within the plan period.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites.

During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

In recent communication with Network Rail, it is confirmed that April 2024 is the earliest date at which the site could be released from operational rail use.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is clear.

In addition to the answers above, on County minerals & waste matters and matters related to the protection of biodiversity, see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM096 & PM097 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA18	<u>Jordan's Brook House</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site is owned by the County Council and it has been part of their social service provision for children and young people. With a change in approach and these services being provided elsewhere, the County submitted the site to the SALA to assess its suitability for housing.</p> <p>The site has been assessed as suitable, available and achievable through the Strategic Assessment of Land Availability (SALA) process. The site represents an opportunity to deliver a small but important contribution to housing requirements, in a predominantly residential area.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The proposal is for approximately 20 dwellings and an appropriate percentage of these dwellings will be affordable as per policy requirements.</p> <p>What is the basis for this and is it justified?</p> <p>Yes, it is justified and reasonable and based on the SALA density methodology.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>The most recent major permission linked to the site is 01/00484/FUL 'Erection of a respite care centre with associated parking facilities.' There are no current applications and no completions/construction.</p> <p>What are the benefits that the proposed development would bring?</p> <p>The development of this brownfield site would help to meet housing needs in Gloucester. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p>

The site is surrounded by attractive residential streets and any residential development on site has the potential to relate well to nearby uses.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

Any adverse impacts should be capable of successful mitigation through the planning process. In terms of impacts on heritage assets, the heritage team have assessed this site through the SALA process and have indicated that there are no Built heritage concerns. In terms of archaeological concerns, the following comments were offered:

This site is situated in an area of some archaeological potential; a Roman cemetery is recorded to the north whilst prehistoric and Roman settlement activity is noted to the west. Furthermore, the natural gravels in this area have been shown to contain important Palaeolithic material – these may extend within the site. The site was also the location of a WWII military camp. Any application for development on this site would need to be supported by an archaeological desk-based assessment and possibly by an archaeological evaluation (trial trenching).

The requirement for an Archaeological Assessment is already outlined in the site schedule.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'). It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, this County Council owned site has been confirmed as available.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

The current City Plan sites trajectory indicated that the first dwellings could be delivered on site in 2022/23. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is clear.

In addition to the answers above see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum Ref:098 & 099* and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*. These are related to improved green infrastructure and the minerals consultation area.

Site SA19	<u>Land off Myers Road</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>This small site was submitted to the SALA by an agent on behalf of the owner. It has been assessed as suitable, available and achievable but only on the basis that the nearby ‘Allstone Sand & Gravel’ site implements its permission 16/00948/OUT to convert its current waste site to residential use. The permission expires on 19.12.2023. The site is considered suitable for residential use, in a predominately residential area, making a small but important contribution to the housing needs of the city. The Council’s ‘Strategic Options for the Gloucester Economy’ confirms, through engagement with stakeholders, that there is not demand for employment development in the Great Western Road area.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>10 dwellings.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is meeting housing need in Gloucester, making the best use of brownfield land and the SALA density methodology.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>The current planning status is unknown. The site is currently in use for a road surfacing business, storage / light industry. There are no current applications for permission or any construction on site.</p> <p>What are the benefits that the proposed development would bring?</p> <p>Redevelopment of this brownfield site could provide for local housing needs and, subject to the implementation of the Allstone permission for housing, would contribute to a significant improvement in the amenity of the area. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p>

The site is broadly triangular in shape. To the north / north east is the residential area of 'Swallow Park', a popular 1980s housing estate. To the east is a vacant area of land - a former gas works. To the south / south east is 'Allstone Sand & Gravel' land used for the storage of crushed recycled aggregates. Access to the site is from Myers Road, which on weekdays is very busy with skip lorries and HGVs associated primarily with the Allstone waste business.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

Adverse impacts are not anticipated and developing the site will improve the locality. There are no built heritage assets on site or in proximity, but the City Archaeologist has confirmed that the site is located fairly close to the recorded locations of two Roman period lead coffins and there is a chance that a cemetery extends into the area. Any application would need to be supported by the results of an archaeological evaluation (trial trenching).

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time

of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

According to information which the agent has submitted to the SALA, the site would not be available in the short term but potentially in years 6-10. As stated, viability and deliverability are dependent on the nearby 'Allstone Sand & Gravel' site implementing its permission 16/00948/OUT to convert its current waste operation/site to residential use.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

Potentially the site could deliver houses in years 6 to 10; so from 2026/27. But this is contingent on the progression of the adjacent Allstones site for residential development. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM100 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA20	<u>White City Community Facility</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was submitted to the SALA process by the White City Community CIC. It has been assessed as suitable, available and achievable (viable) for the proposed use. The need for a community facility in this area has been generated through the redevelopment of the previous facility at St Aldates church. The allocation provides the opportunity to deliver new facilities, in a location that provides for the community's needs. The City Council has engaged proactively with the local community group, (White City Community CIC) in progressing the opportunity.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The use proposed is a Community Centre.</p> <p>What is the basis for this and is it justified?</p> <p>The basis is a need for such a facility given the loss (to housing) of a community facility at St Aldates.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>There is currently a planning application with the Council pending consideration (21/00298/FUL). This is for the construction of a community and recreation centre, adventure playground building with associated external works and car parking. There is no construction on site.</p> <p>What are the benefits that the proposed development would bring?</p> <p>There will be significant benefits for the local community in the area proximate to the site and further afield with the provision of a new community centre for activities and sports and a new adventure playground. This is likely to led to increased levels of health and wellbeing. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p>

The site currently backs onto the railway line. To the south and east are residential areas and to the north east are allotments and playing fields.

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

The heritage team have assessed this site through the SALA process and have indicated that there are no Built heritage or archaeological concerns.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a very low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Given the nature of the development which will be providing community and sport infrastructure, there are no additional infrastructure costs identified within the Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001).

Is the site available, realistically viable and deliverable?

Yes, according to representations by White City Community CIC the site is available and there is currently a planning application with the Council for determination.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

There is currently a planning application (21/00298/FUL) with the Council for determination. The current trajectory for City Plan allocations indicates that development on site could start in 2021/22.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, the terminology is consistent and clear.

In addition to the answers above, on County minerals & waste matters, see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM101 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

Site SA21	<u>Part of West Quay, the Docks</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site was submitted to the SALA and put forward for allocation by the owners - the Canal and River Trust. The site is located in the historic Docks and provides an opportunity for a mix of main town centre uses, including residential development. The allocation does not specific proportions or uses in the mix expected, as the site will require the flexibility to respond to the market at the time the application is made.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>The site is allocated for main town centre uses including approximately 20 dwellings.</p> <p>What is the basis for this and is it justified?</p> <p>Main town centre uses are appropriate on this site as long as the heritage assets and the character of the Conservation Area are preserved and protected. The 20 dwelling figure is approximate and based on the SALA density methodology. The Canal & River Trust have indicated in their response to the Regulation 19 Consultation that this figure could be higher. The Council have agreed to add additional wording to the site schedule to address this concern. See the proposed modifications in Submission Document (CD010a) the <i>Schedule of Changes Pre-Submission Gloucester City Plan Addendum</i> Ref: PM102 and shown as a part of the GCP in Submission Document (CD010b) <i>Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan</i>.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>Note: the allocation does not include Alexandra warehouse. The current uses of the site are:</p> <ul style="list-style-type: none"> • Gloucester Brewery at Alexandra Quay. The latest permission is: (16/01543/FUL). Extension of current use as brewery/visitor centre to include class D2, to host brewery tours, live music events, comedy nights and beer festivals (to be mixed use class B2/A1/D2). • Furniture Recycling Project warehouse at Alexandra Quay.

There are no current applications or construction activities on site.

What are the benefits that the proposed development would bring?

The proposed development of this brownfield site would bring an opportunity to better reflect the character of this important and very visible part of the Docks area. It would also bring an opportunity to enhance the Listed Alexandra Warehouse and its setting and improve the public realm and the Docks Conservation Area generally. Some residential use of the site would increase the vibrancy of the area and footfall for local businesses. A further benefit of a residential scheme would be the opportunity for increased overlooking of Llanthony Road. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.

How does the site relate to nearby uses?

Nearby uses are the historic (but still functional) T. Neilson & Company Dry Dock and associated workshops, Gloucestershire College buildings to the south and the obviously the entrance to the main Docks basin fronting the site. Alexandra warehouse is in the centre of the site, but does not form part of the allocation, and this is in use as a nursing training facility by the University of the West of England. Gloucester Docks more widely is located within the defined Gloucester City Centre boundary, where a range of main town centre uses are considered acceptable (see Policy SD2 of the adopted JCS).

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

Adverse impacts can be mitigated, and sensitive development should certainly improve this important and prominent site. Arguably, At the moment it is not fulfilling its potential as a key site within the Docks area. In terms of potential impacts on heritage assets, clearly this is a Conservation area with Listed Buildings in close proximity. The following comments are from the Council's Heritage Team:

On Built Heritage:

West Quay – Malthouse and Alexander warehouse are both GII listed and site in Docks Conservation Area. Would require heritage assessment/assessment of significance together with some form of options appraisal/masterplan for the site to consider development opportunities. Heights of buildings and setting impacts need to be considered with any new development and would not wish to dilute historic warehouse form but contribute to areas industrial character. Uses important to consider also with more active uses and not just residential.

On Archaeology:

A site of great industrial archaeological interest containing warehouses and buildings of 19th century date and later. There is a mix of Listed and undesignated historic buildings – some of which may be heritage assets of some significance. The site also contains the historic routes of rail lines associated with the South Wales Railway. This is an important site and any planning application should be supported by a desk-based assessment incorporating an assessment of the standing buildings. Further evaluation may also be required.

Note: The specific requirements contained in these comments are included in the Policy Site Schedule.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

Flood risk on this site has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The site is close to the River Severn and in Flood zone 2. Very small parts of it are in Flood zone 3. In allocating the site the sequential test was applied and passed. See Submission Document (NAT005).

On flood risk the Policy Site Schedule currently states: *A site-specific Flood Risk Assessment is required if any development is located within Flood Zones 2 or 3 or is greater than one hectare. Other sources of flooding should also be considered.*

There is a requirement for assessment and implementation of SuDS in accordance with general advice and site-specific recommendations in the Strategic Flood Risk Assessment (SFRA) Level 2 (September 2019).

Additionally, the Policy Site Schedule states: *Consideration to be given to the protection of water quality during construction and operation.*

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

Infrastructure associated with the residential element are considered directly related to, necessary and reasonably related in scale and kind to the development. The requirements and costs have been calculated and are detailed in the evidence base – see Gloucester Infrastructure Delivery Plan, September 2019 Submission Documents (INF001) and Appendix A, B & C (INF001/a, INF001/b and INF001/c).

Indicative headline costs can be found in the INF001/b Gloucester IDP Calculator. This includes projected costs specifically for this site with regard to a range of different infrastructure requirements. Please note that projected maximum costs for education provision have been updated following liaison with Gloucestershire County Council as education authority (see Submission Document INF002 'Infrastructure Delivery Plan Addendum'. It is also important to note that some of the identified infrastructure is externally funded and not to be delivered through new development. The Council's approach towards infrastructure delivery and viability is set out in the 'Infrastructure and Viability Background Paper' (Submission Document INF003).

It should also be noted that the JCS IDP provides much of the wider infrastructure needs for the GCP growth.

Further calculations of the infrastructure costs will be made at the planning application stage. The calculators for education, open space and sport rely on the input of housing mix and bedroom numbers which are not known at this stage. An assessment of local need at the time of the application is also considered. These calculators ensure the infrastructure ask reflects the need and are reasonable in scale and kind at the time of the application.

Is the site available, realistically viable and deliverable?

Yes, the site is available according to recent communications between the Council and the owners, the Canal & River Trust.

The GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

According to the latest trajectory for City Plan allocations some elements of the proposed development could be completed by 2022/23. See Submission Document MN006 '5 Year Housing Land Supply Statement 2020'.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

Yes, it is clear and consistent.

Site SA22	<u>Land adjacent to Secunda Way Industrial Estate</u>
	<p>What is the background to the site allocation? How was it identified and which options were considered?</p> <p>The site has been identified for a number of years as a potential employment allocation. It was submitted to the SALA process and assessed as suitable, available and achievable for employment use. Following a change of ownership part of the site was cleared and an application for residential use was received by the Council.</p> <p>How have the wider transport implications of the proposed development been considered?</p> <p>The local and wider transport implications for the proposed development have been fully considered. This was done at an early stage through the SALA, where County Highways Development Coordination were consulted and in detail through the Gloucester City Plan Transport Assessment Report October 2020 produced by Atkins – Submission Document (SUS004).</p> <p>These matters are also addressed and fully agreed in Statements of Common Ground with Highways England – Submission Document (SoCG1) and Gloucestershire County Council Highways Authority – Submission Document (SoCG2).</p> <p>What is the scale type/mix of uses proposed?</p> <p>B class employment use.</p> <p>What is the basis for this and is it justified?</p> <p>Part of the site already has an established employment use (warehouses to the north of the plot) and the site formed a logical extension and the best use of the site.</p> <p>What is the current Planning status of the site in terms of Planning applications, Planning permissions and completions/construction?</p> <p>Application 19/01141/FUL has Committee Resolution to Permit on 02.03.2021. This is for 'Construction of 4 three-storey buildings comprising 36 apartments (33 x two bedrooomed and 3 x one bedrooomed) with associated car parking, bin/recycling and cycle storage.'</p> <p>What are the benefits that the proposed development would bring?</p> <p>This site is relatively small but would add to the stock of employment sites in the city providing premises for small businesses / industry. Other site-specific benefits/opportunities to be delivered through the development of the site are identified in the allocation policy.</p> <p>How does the site relate to nearby uses?</p> <p>The site is linear and follows the line of the busy Secunda Way or Hempsted By-Pass. To the west and south are playing fields. To the east, on the other side of Secunda Way, lie residential areas. North of the site is a small copse following the bend of the road.</p>

What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

Any potential adverse impacts are capable of successful mitigation. In terms of heritage assets there are no concerns from the Heritage team on built heritage assets or archaeology.

How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?

There is a low risk of flooding on this site. Flood risk has been assessed through consultation with Flood risk professionals at the City Council at the SALA stage and also through the detailed SFRA Level 2 – Submission Documents (NAT003, NAT004, NAT004a & NAT004b). The sequential and exception tests have not been applied as the site is entirely within Flood Zone 1. However, see modification in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum* Ref: PM103 and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan*.

What are the infrastructure requirements/ costs? How would these be addressed and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?

There are no specific infrastructure costs identified in INF001 Gloucester Infrastructure Delivery Plan. The JCS IDP provides much of the wider infrastructure needs for the City Plan growth.

Is the site available, realistically viable and deliverable?

The land has been promoted for a significant period of time by two different promoters both of whom confirmed that the site is available for development.

In terms of viability, the GCP taken as a whole has been shown to be viable. Individual site viability assessments have not been undertaken at this plan making stage and it is not necessary to do so. Although the whole plan viability should not be used to assess the detailed viability of individual sites, a number of typologies were tested that broadly fit the spectrum of proposed site allocations in Gloucester. Some typologies are more viable under full policy requirements than others, as would be expected, but this is not expected to impact the delivery of the bulk of housing sites. During the planning application process if the viability of an individual site is considered an issue, the adopted JCS Policies INF7 and SD12 allow the applicant to submit a site-specific viability assessment and for policies to be applied flexibly. Furthermore, the site was found to be realistically viable and deliverable by means of the SALA process which included an assessment panel with industry representatives.

What is the expected timescale and rate of development and is this realistic?

To be determined through the monitoring process.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

Yes, the boundary is appropriate for the proposed employment allocation; in that the extent shown is correct. It does not need amendment.

Is the terminology used within the relevant site-specific policy consistent and clear?

The terminology is consistent and clear for the proposed employment allocation.

In addition to the answers above see the proposed modifications in Submission Document (CD010a) the *Schedule of Changes Pre-Submission Gloucester City Plan Addendum Ref:* and shown as a part of the GCP in Submission Document (CD010b) *Appendix 1 Tracked Changed Pre-Submission Gloucester City Plan.*