Gloucester City Council

Local Development Framework

Core Strategy
Issues and Options Consultation Paper

April 2005

GLOUCESTER
CITY COUNCIL
Sustainable Development

CONTENTS

1. INTRODUCTION

1.1 Work is underway on a new 'Local Development Framework' for Gloucester which will shape the planning and development of the City over the next 10 years not just in physical and environmental terms but also in social and economic terms.

1.2 The local development framework will replace the existing Local Plan and will consist of the following documents:

- Core Strategy
- Development Control Policies
- Gloucester Heritage Urban Regeneration Area Action Plan
- Site Allocations and Designations
- Proposals Map; and
- Supplementary Planning Documents

1.3 Once they have been adopted, the policies and proposals set out in these documents will be used to promote positive change and guide planning and other policy decisions across the City.

1.4 Some of these actions will be carried by the City Council whilst others will be the responsibility of the private sector, the Gloucester Heritage Urban Regeneration Company, the health service, the education authority, public utilities, the emergency services, voluntary groups, the Gloucestershire Local Strategic Partnership and other relevant organisations and service providers.

1.5 The Core Strategy is the most important document within the Local Development Framework as it establishes the overall context for the future growth of Gloucester and all other development plan documents must therefore be in conformity with it.

1.6 To summarise, the Core Strategy will comprise the following:

- A Spatial Vision for Gloucester
- Strategic Objectives
- A Spatial Strategy
- Core Policies; and
- A Monitoring and Implementation Framework

1.7 This is your chance to comment on a series of initial issues and options. This paper will be the subject of a rolling consultation taking place between **25th April and 11th July 2005.**

1.8 Responses received during the first four weeks of this period (i.e. between **25th April and 23rd May**) will be taken into account by Officers and a more detailed draft version of the documents will then be published for further comment between **13th June and 11th July 2005.**

1.9 Comments may be submitted in writing at any time either electronically via the City Council's website (www.gloucester.gov.uk) by post or in person.

1.10   We hope that by obtaining the views of residents and interested parties at an early stage we will be able to reach agreement in terms of which direction the Core Strategy for Gloucester should be heading in and what its priorities should be.

1.11   A preferred options consultation on the Core Strategy will then take place in October 2005.

Please note: A separate consultation paper on potential development control policies (used to determine planning applications) is also available for comment.

1.12   If there are any abbreviations or phrases you don't understand please contact us or look at the glossary of terms set out at the rear of the Council's Local Development Scheme (available online at www.gloucester.gov.uk or from the Planning Department, Herbert Warehouse, the Docks).

2.   <u>CONTEXT</u>

2.1   The City of Gloucester is the administrative centre of Gloucestershire and for many years has acted as a growth point, absorbing housing and employment development in order to relieve pressure on more environmentally sensitive parts of the County.

2.2   The City has expanded rapidly in recent years with extensive house-building programmes taking place on the fringe of the City in Abbeymead and Quedgeley. Purpose-built employment sites have also been developed at Barnwood Fields, Olympus Park and Waterwells Business Park in the south of the City.

2.3   The population of the City has risen from 92,459 in 1981 to 109,885 in 2001.

2.4   The role of Gloucester as a centre for growth is set to continue. The City is identified in regional and county planning policy as a 'Principal Urban Area' and along with Cheltenham, is expected to accommodate the majority of Gloucestershire's growth for the foreseeable future. On a trend-based projection, the population of Gloucester is expected to grow to 119,700 by 2021 – the largest District population in the County.

2.5   The administrative boundaries of Gloucester are however tight and development opportunities are relatively limited. A key challenge of the new Local Development Framework will be to accommodate the forecast levels of growth while successfully balancing the competing demands of different land uses.

2.6   The Core Strategy has a vital role to play not only in balancing these competing demands but also in integrating them with wider social and economic factors.

2.7   Before discussing the possible contents of a Core Strategy for Gloucester it is worth briefly summarizing the national, regional and local policy framework within which the strategy will sit.

2.8   Some of the key national policy documents of relevance to the development of a Core Strategy for Gloucester are briefly summarized below.

Planning Policy Statement 1 – Delivering Sustainable Development

2.9   PPS1 sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. The core principle of the statement is sustainable development, which is defined as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'.

2.10   The Government's four aims for sustainable development are:

- Social progress which recognises the needs of everyone
- Effective protection of the environment
- The prudent use of natural resources; and
- The maintenance of high and stable levels of economic growth and employment.

2.11   The guidance goes on to state that planning should facilitate and promote sustainable development by:

- Making suitable land available for development in line with economic, social and environmental objectives
- Contributing to sustainable economic development
- Protecting and enhancing the natural and historic environment, the quality and character of the countryside and existing communities
- Ensuring high quality development through good and inclusive design and the efficient use of resources; and
- Ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

2.12   Sustainable development must be treated in an integrated way within Local Development Frameworks. In particular consideration should be given to the interrelationship between social inclusion, protecting and enhancing the environment, prudent use of natural resources and economic development for example the recognition that economic development, if properly planned, can have positive social and environmental benefits.

2.13   PPS1 also emphasises the importance of achieving good design as well as the need to achieve effective community involvement.

The Communities Plan

2.14　The Deputy Prime Minister launched the Communities Plan (Sustainable Communities: Building for the future) on 5 February 2003. The Plan sets out a long-term programme of action for delivering sustainable communities in both urban and rural areas.

2.15　'Sustainable' communities are characterised by factors such as a strong local economy, effective engagement of local people, a safe and healthy environment, good public transport, a well integrated mix of decent homes, good quality local public services, diverse local culture and a sense of place.

2.16　Key elements of the Communities Plan include the need to address housing shortages, protecting the countryside, the provision of more 'decent' homes, addressing low demand and abandonment and the importance of improving the local environment of all communities (referred to as 'liveability').

<u>Regional Policy</u>

2.17　Relevant regional policy documents are briefly outlined below.

Regional Planning Guidance for the South West (2001)

2.18　The Core Strategy will be prepared in accordance with Regional Planning Guidance for the South West (RPG10), which was published in 2001 and covers the period to 2016.

2.19　The guidance stipulates that in Gloucestershire in the period between mid 2001 and mid 2016, provision will be made for 36,000 dwellings – an average of 2,400 per year.

2.20　Key themes set out in RPG10 in relation to Gloucester include:

- The identification of Gloucester as one of 12 Principal Urban Areas
- Gloucester along with Cheltenham to be the focus of growth in Gloucestershire
- The need for balanced housing/employment growth
- Constraints to future development including the River Severn Floodplain
- The need for investment in urban regeneration and in transport and social infrastructure
- Growth through intensification of development within the urban area

2.21　A Regional Spatial Strategy (RSS) will eventually replace RPG10 and will cover the period to 2026. The Core Strategy will be rolled forward to reflect the new RSS in due course.

'Just Connect: An Integrated Regional Strategy for the South West' (2004)

2.22 Launched in 2004 the IRS provides a common set of objectives and outcomes for the region. Key aims of the document include:

- To harness the benefits of population growth and manage the implications of population change

- To enhance our distinctive environments and the quality and diversity of our cultural life

- To enhance our economic prosperity and quality of employment opportunity

- To address deprivation and disadvantage to reduce regional inequalities

- To make sure that people are treated fairly and can participate fully in society

Local Policy

2.23 At the local level the Core Strategy will need to knit in with a number of other policy documents including the Gloucestershire Structure Plan and the Gloucester Community Strategy, 'Our Gloucester Our Future'.

2.24 It will also reflect to some extent the Gloucester Local Plan Second Stage Deposit (2002) much of which remains up to date and relevant to the future development of the City in physical, social and economic terms.

Gloucestershire Structure Plan

2.25 The Gloucestershire Structure Plan Third Alteration is well advanced and should be adopted during 2005. It covers the period 2001 to 2016 and establishes the strategic pattern of development across Gloucestershire as a whole. In particular, it establishes the amount of housing growth within each District/Borough.

2.26 The most recent modifications to the Structure Plan suggest that in Gloucester approximately 10,200 dwellings will need to be found between mid 2001 and mid 2016 equating to 680 dwellings per year. This is the largest level of provision of all Gloucestershire authorities.

2.27 To put this in context, the average number of new houses completed per annum in Gloucester between 1997 and 2002 was 412 (source: Gloucester City Council Housing Land Availability Report 2004).

2.28 The Core Strategy will in the first instance be prepared in accordance with the Structure Plan Third Alteration. It will then be rolled forward to reflect the emerging Regional Spatial Strategy.

Gloucester Second Stage Deposit Local Plan (2002)

2.29   Although not formally adopted, the Second Stage Deposit Gloucester Local Plan remains highly relevant to the future development of the City.

2.30   Elements of the plan will therefore be revisited in the Core Strategy. In particular, we believe the plan's main focus of regenerating the central area of the city remains valid and should form the basis of the new Spatial Strategy.

Gloucester Community Strategy 'Our Gloucester Our Future'

2.31   The Gloucester Community Strategy was adopted in March 2003 and sets out six ambitions for Gloucester over the next ten years.

2.32   These are:

- Ambition 1 – A Strong, Vibrant and Sustainable City
- Ambition 2 – An Inclusive City
- Ambition 3 – A Healthy Active City
- Ambition 4 – Opportunities to Live, Learn and Play
- Ambition 5 – A Safe, Clean and Pleasant City
- Ambition 6 – Working Together

2.33   Targets include: improving public, community and non-motorised transport to encourage less car use, increasing access to health services, reducing by 10% per year housing that does not reach Decent Homes standards and the provision of 1000 affordable new homes.

2.34   The Local Development Framework will be prepared in close alignment with the Community Strategy and will to a large extent be the practical mechanism through which many of the Community Strategy's aims and objectives are achieved, particularly where these relate to the use of land for example affordable housing provision and the promotion of non-car modes of transport.

2.35   The Community Strategy can be viewed online at **www.gloucester.gov.uk**

'Blueprint for Change'

2.36   The Council's Corporate Strategy for 2005 – 2008 'Blueprint for Change' has three main priorities:

- Streetcare
- Regeneration
- Efficiency and Effectiveness

2.37   The first two of these priorities in particular are closely linked to the Core Strategy. Targets set out in the Corporate Strategy include for example recycling, improving the quality of parks and open spaces, redeveloping the bus station, King's Square and Blackfriars, increasing the number of homes for people on low incomes and improving community facilities.

3.   KEY ISSUES FOR GLOUCESTER

3.1   So we've discussed the existing and emerging policy framework surrounding the future development of Gloucester, but on a local level what are the key issues that face the City?

3.2   Set out below is a list of what we consider to be the key issues facing Gloucester now and in the future. These have been used to shape the potential visions, objectives and strategies set out in the following sections of the paper and are therefore extremely important.

3.3   We realize the list may not be complete or that there may be certain issues you disagree with. We would like you to comment on the list and let us know what you think. Are there issues not mentioned below that you consider important to the future development of Gloucester as a whole? Do you disagree with any of the issues we have raised? We would like to know!

3.4   Some of the key issues facing Gloucester are considered to be:

1. **Gloucester is defined as a Principal Urban Area (PUA) and is expected to accommodate the majority of the County's growth in the period to 2016 and beyond**

2. **Development of the City is constrained by its tight administrative boundary, areas of landscape conservation importance and the extent of the River Severn Floodplain**

3. **There is a shortage of good quality employment land available**

4. **Parts of the City suffer from higher than average levels of deprivation and unemployment**

5. **Gloucester's heritage is one of its strengths but its industrial past means potential development land may be subject to contamination**

6. **Gloucester has a higher than average crime rate**

7. **The city centre is lagging behind other towns like Cheltenham and Worcester**

8. **Statistics show that the health of Gloucester residents when compared to residents of Gloucestershire as a whole is poor**

9. **The City Centre lacks vibrancy and activity during the evening hours**

10. **Gloucester is an important tourist destination but needs to increase the number of visitors staying overnight**

11. **The City has lots of previously developed land and buildings particularly in the Central Area much of which has the potential to be brought into more effective use**

12. **Car use and ownership in Gloucester is higher than average**

13. Gloucester pupils perform more poorly at all key stages than the national averages except for KS4 (GCSEs)

14. Gloucester has a higher percentage of black and minority ethnic groups than any other district in the County

15. There is a need for more affordable housing

> Are there any issues set out above that you disagree with? Similarly can you think of any important issues that have not been mentioned?
> Please let us know.

3.5   Taking into account the key issues set out above it is possible to start developing a 'vision' for Gloucester that captures the direction in which the future development of the City should be taken forward over the next ten years.

4.   A 'SPATIAL VISION' FOR GLOUCESTER

4.1   We need to agree on a 'spatial vision' for Gloucester. This means developing a relatively short and snappy statement, which sets out what we want to achieve over the next ten years in physical, economic and social terms.

4.2   Obviously this is no easy task particularly as developing a 'spatial' vision means looking beyond just land use and the granting of planning permission and taking into account wider social, economic and environmental issues including education, health, social inclusion, waste, biodiversity, recycling, crime prevention and environmental protection.

4.3   So what should Gloucester's Spatial Vision look like?

OPTION 1

4.4   One option would be to incorporate the existing vision of the Second Stage Deposit Local Plan (2002), which is:

> **'To create a City that looks good and feels good'.**

4.5   The underlying aim of this vision is,

> **'To promote the economic, social and environmental well-being of the city through careful husbandry of new development and capitalising on the unique character and traditional urban form of this historic city'.**

4.6   Notably the vision received just one objection when it was first published in 2001.

4.7   We believe it remains an effective statement that manages to succinctly address a wide range of issues including design, health, heritage, quality of life, the economy, the environment, regeneration and development.

4.8   What do you think? Is this a suitable vision for our new Core Strategy?

OPTION 2

4.9 A second option would be to adopt the existing vision of the Gloucester Community Strategy, which is:

> **'To create a fair, just and thriving community in Gloucester where no-one is seriously disadvantaged'**

4.10 A number of other local authorities are proposing to adopt the visions of their respective community strategies. Do you think we should do the same?

4.11 Does this vision capture sufficiently the direction in which Gloucester should be taken over the next ten years?

4.12 Certainly it addresses social and economic issues but does it deal sufficiently with environmental and land use issues?

OPTION 3

4.13 A third option would be to develop an entirely new vision for Gloucester. You are welcome to put forward your own ideas but to assist you some possible visions are set out below.

> **A** **'A sustainable and inclusive City where everyone has access to decent affordable homes, jobs, shops and services and where development takes place at the right time and in the right location'.**
>
> **B** **'A prosperous and sustainable City which successfully balances the need for new development against the need to protect the natural and built environment'**
>
> **C** **'A City in which the needs of everyone are recognised, where no-one is disadvantaged and where development does not compromise the ability of future generations to meet their own needs'.**
>
> **D** **'To create through an ongoing 'urban renaissance' a modern and inclusive city for the 21st Century providing enough jobs and housing for everyone whilst making the most effective use of existing land and buildings wherever possible'**
>
> **E** **'A prosperous, inclusive City which is characterised by a high quality of life, a clean and pleasant environment, high and stable levels of economic growth and good access to a wide range of shops and services'.**

> Using either the online or paper response form please let us know your preferred 'vision' for Gloucester.

4.14 We would like to know what you think of these possible visions? Do any of them summarise what we should be looking to achieve for Gloucester over the next decade? Perhaps two of the visions could be combined? Do you have your own vision for Gloucester you would like to put forward?

5.   STRATEGIC OBJECTIVES

5.1   To support the vision of the Core Strategy we need to develop a set of strategic objectives, which need to take account of the key issues discussed earlier.

5.2   We envisage including no more than 20-25 strategic objectives within the Core Strategy as having any more than this is likely to bring their practical implementation into question.

5.3   We would like your views on what the strategic objectives for Gloucester should be. To assist you we have drafted a number of objectives based on the key issues outlined earlier. These are set out below. (Please note: the objectives are not set out in order of priority).

SO1 – To regenerate Central Gloucester

SO2 – To provide the right development in the right place at the right time to meet people's needs

SO3 – To encourage and facilitate inward investment and to create high and stable levels of economic growth

SO4 – To encourage better use of public transport, walking and cycling

SO5 – To provide a mix of house types to meet peoples' needs at prices which they can afford

SO6 – To ensure that all new development achieves the highest possible standards of design

SO7 – To improve the attraction of Gloucester as a visitor destination

SO8 – To tackle unemployment and poverty particularly in Gloucester's most deprived areas

SO9 – To reduce crime and people's fear of crime by ensuring that community safety is a fundamental principle of all new development

SO10 – To improve educational attainment by ensuring that all residents have good access to learning establishments

SO11 – To improve the health of Gloucester residents and to ensure that everyone has good access to health care provision

SO12 – To protect, conserve and enhance the historic and cultural environment of the City

SO13 – To ensure that everyone has good access to local shops and services

SO14 – To ensure that everyone has good access to high quality sport, leisure and recreational facilities including publicly accessible open space

SO15 – To steer new development to suitable locations

SO16 – To improve shopping provision in the city centre and within district and local centres

SO17 – To protect and provide a range of facilities suitable for use by the community

SO18 – To maintain a high quality environment in terms of biodiversity, landscape character, air, soil and water quality

SO19 – To safeguard and where possible, restore the capacity of the River Severn Floodplain to reduce the risk of flooding

SO20 – To make the most efficient use of land

SO21 – To bring back into effective use previously developed land and buildings including those that may have been contaminated by their former use

SO22 – To develop a vibrant and safe evening economy that appeals to all age groups

SO23 – To encourage mixed-use development

SO24 – To instil a sense of pride in the City and responsibility for its appearance amongst all who live, work or visit here

SO25 – To encourage an inclusive society which involves people and communities and takes into account the needs of minority groups

SO26 – To reduce the consumption of natural resources through environmentally friendly construction, the promotion of renewable forms of energy and effective recycling

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Do you agree with any or all of these objectives? Are there any that should be deleted?
Should they be prioritised? If so which are the most important?
Are there any other important objectives that haven't been mentioned?

6. SPATIAL STRATEGY

6.1 Having discussed a potential vision for Gloucester and what the strategic objectives for the City should be, the next step is to develop these into a strategy.

6.2 In other words whilst Strategic Objective 1 – the regeneration of central Gloucester - is an admirable aim, how can this best be achieved in practical terms?

6.3 Set out below is a possible spatial strategy for Gloucester. Only one option is put forward because as a compact urban area with tight administrative boundaries, development options in Gloucester are fairly restricted. You are however welcome to put forward your own suggested strategy.

6.4 The City is almost completely built up to its northern and eastern limits. Recent housing developments at the former Horton Road Hospital and Coney Hill Hospital sites mean that there are no remaining sites of any significant size likely to be available for development in the eastern part of the city.

6.5 Along the western side, the built up area is bounded by the floodplain of the river severn. The continuing development of Waterwells Business Park and the granting of planning permission for mixed-use residential and employment development at RAF Quedgeley mean that the southern limit of the City will also soon be reached. Development to the south-east is constrained by the strategically important area of landscape that links Robinswood Hill to the Cotswold escarpment.

6.6 Whilst in a rural district it may be possible to consider several different strategies e.g. concentrated growth in one or two main towns or more evenly distributed growth across a number of smaller settlements, in Gloucester, we believe the only feasible option for future growth of the scale that will be required over the next ten years is to focus predominantly (but not exclusively) on the central area of the city where there are significant areas of previously developed land and buildings suitable for redevelopment.

6.7 Notably this general approach received considerable support during our previous issues and options and deposit plan consultations in 2000 and 2001/2 respectively and we believe it remains the most appropriate and sustainable approach for the future development of the City.

6.8 You are of course welcome to put forward any alternative strategies, which we will consider in detail before taking the core strategy any further.

PROPOSED SPATIAL STRATEGY – FOCUS ON CENTRAL AREA REGENERATION

6.9 The proposed strategy seeks to maximize Gloucester's opportunities and build on its strengths in order to deliver a sustainable and ongoing urban renaissance. This will be achieved through the following over-arching objectives:

- Focusing the majority of new development into the central area of Gloucester as defined by the GHURC boundary (Refer appendix 1).

- Upgrading and enhancing the local and strategic transport network including the completion of the inner relief road and SW Bypass in order to facilitate the development of the central area, increase opportunities for public transport and to enable RAF Quedgeley to be developed as planned

- Realizing the full development potential of previously developed land and buildings in order to safeguard Greenfield land.

- Encouraging the most efficient use to be made of land and buildings including the development of high-density residential schemes in appropriate locations particularly along major transport routes and in the city centre

6.10 The key diagram attached at Appendix 1 illustrates the extent of the 'central area'. It includes the City Centre, land inside the inner relief road, the area known as the Western Waterfront, the railway corridor and railway triangle and land either side of the Gloucester-Sharpness Canal stretching down as far as what is commonly referred to as 'Two Mile Bend'.

6.11 This central area coincides with the boundary of the Gloucester Heritage Urban Regeneration Company (GHURC) and the proposed 'Area Action Plan' that will be published as part of the Local Development Framework at a later date.

6.12 What do you think of this broad approach? Are we right in focusing the majority of new development towards this central location? Should we be narrower in defining the central area?

6.13 The underlying principles of the proposed spatial strategy include:

- Securing a good, balanced mix of uses in the central area including housing, employment, leisure, retail and community facilities

- Encouraging integrated mixed-use developments (e.g. flats above offices) in order to reduce the need to travel and increase social interaction and vitality

- Strengthening the Primary Shopping Area by encouraging new retail and leisure/cultural development in appropriate locations

- Resisting out of centre retail and leisure proposals that would harm the vitality and viability of the city centre

- Creating a balanced network of district and local centres that provide a range of shops and services for local people including the creation of new centres in appropriate locations (e.g. areas not currently well-served by an existing centre)

- Permitting residential development in appropriate locations outside the central area giving priority to the development of previously developed or 'brownfield' land in preference to Greenfield sites.

- Locating developments which attract a lot of people e.g. cinemas, bowling alleys etc. into and adjacent to the city centre in order to enable linked trips and to promote greater use of public transport, walking and cycling

- The successful completion of the proposed RAF Quedgeley mixed-use development

- The continued expansion of Waterwells Business Park alongside employment development at RAF Quedgeley as Gloucester's prime strategic location for employment uses.

- Protecting environmentally sensitive parts of the City from inappropriate development e.g. the River Severn Floodplain and areas of landscape conservation importance

- The safeguarding of Gloucester's important heritage through the protection and enhancement of its listed buildings, conservation areas and sites of archaeological importance.

- Protecting existing areas of publicly accessible open space including playing fields; and

- Resisting the loss of and providing for new community facilities where these are needed including health care and education provision

Advantages

6.14 The strategy set out above has a number of advantages. Some of these include bringing back into use vacant land and buildings that may be falling into disrepair, the development of a vibrant and successful city centre and providing effectively for local shopping and community needs.

6.15 Other advantages include the protection of Greenfield sites and other environmentally sensitive areas and reducing the need to travel by car through the promotion of walking, cycling and public transport.

<u>Disadvantages</u>

6.16   The proposed spatial strategy also has a number of potential disadvantages. In focusing the majority of future growth into the central area, clearly some existing occupants may be displaced by new forms of development and would be forced to re-locate elsewhere. Having said that focusing development onto previously developed land within the urban area is consistent with national, regional and county level planning policy. Furthermore, it will be possible to incorporate a number of existing occupants through for example mixed-use development.

6.17   The strategy also runs the potential risk of increasing traffic congestion in the central area if people's travel habits fail to shift away from using private cars in favour of using public transport, walking and cycling. We are confident however that the proximity of different types of use including housing, jobs, shops and services as well as improvements to public transport and provision for walking and cycling will lead to less reliance on use of the car. Again this approach is consistent with established national and regional policy.

6.18   We would like to know what you think of the proposed spatial strategy set out above.

6.19   We believe the underlying focus on the regeneration of the central area is not only consistent with national, regional and local policy but is also the most sustainable and realistic option for meeting the development requirements that will be placed on the city over the next ten years and beyond.

> **Do you agree or are there any alternative strategies that we should be looking at? Please let us know what you think!**

7. CORE POLICIES

7.1   In order to support the spatial strategy, the core strategy must include a set of 'core policies' which development must have regard to. Based on the visions, objectives and strategy set out in the previous sections we would like your views on what issues our core policies should be addressing.

7.2   There is no limit to the number of policies we can include, however in the spirit of the Government's intention to make development plan documents more accessible and succinct, we are envisaging having no more than 15 core policies. Whilst these can establish the overall context for the Council's Development Control Policies they should not duplicate each other.

7.3   Set out below are a number of potential core policies for you to comment on. These are based on the potential key issues, strategic objectives and spatial strategy discussed in the previous sections. The policies have deliberately not yet been drafted in detail instead we have indicated in general terms the types of issues that could be addressed under each policy heading.

7.4   You are invited to comment on the potential policy headings as a whole, as well as the more specific issues set out under each.

CORE POLICY 1 – KEY DEVELOPMENT PRINCIPLES

The purpose of this policy would be to set out the key principles that the Council will apply in assessing development proposals. These could include whether the proposal:

- Is consistent with the Council's Spatial Strategy
- Accords with the fundamental principles of sustainable development
- Respects the built and natural environment
- Makes the most efficient use of land including previously developed land and buildings
- Would contribute to a reduction in car use
- Achieves the highest possible standards of design
- Would not cause harm to a designated centre
- Would create an unacceptable burden on existing infrastructure

Do you think we need this type of over-arching policy? Should it apply to all development or just to certain types e.g. larger schemes?

An alternative approach would be to rely on a combination of other policies within the local development framework rather than have a single over-arching policy. What do you think?

CORE POLICY 2 – HOUSING PROVISION

This policy would set out the overall level of housing provision to be accommodated in Gloucester in the period to 2016.

There are several options open to the Council and we would like your views on how this issue should be dealt with.

One option would be to base the level of new housing provision on the contents of the Gloucestershire Structure Plan Third Alteration which is due for adoption in 2005. However, a direction has recently been issued which prevents the County Council from adopting the plan thereby adding a degree of uncertainty.

Notwithstanding this, the most recent modifications to the Structure Plan indicate that provision should be made in Gloucester for 10,200 dwellings between 2001 and 2016.

This figure has been informed by the City Council's own urban capacity work and we would therefore be confident relying on it as the basis of the Council's Core Strategy housing requirement in the period to 2016. It is also pertinent to note that the direction which has been issued in relation to the Structure Plan, should not affect the level of housing provision in the Gloucester City administrative area.

What do you think? Should we be basing our housing requirement on the Structure Plan Third Alteration?

A second option might be to treat the 10,200 Structure Plan figure as a minimum requirement for new housing in Gloucester. Under this scenario, the City Council would seek to maximise all acceptable opportunities for development within the urban area, perhaps looking beyond 2016 with the release of sites to be phased under a 'plan monitor and manage' approach.

What do you think about this approach? Should we be looking beyond 2016 in terms of new housing provision in Gloucester? Should we be looking to phase development over the longer term?

The implications of this approach are that inevitably the limited number of Greenfield sites located in Gloucester would be identified for development at some point.

What do you think about building on Greenfield land? How should we be dealing with the few Greenfield sites left in Gloucester? Should we be avoiding the development of these sites or should we be more flexible?

Should we adopt a phased approach that allows Greenfield sites to come on stream at a later date?

A third option would be to set an annual housing requirement rather than a 15-year target. This annual figure could then be adjusted as necessary in light of the Regional Spatial Strategy when that is adopted, meaning that the Core Strategy wouldn't have to be overhauled too significantly.

We are cautious about using an annual figure because housing delivery in Gloucester fluctuates greatly from year to year.

What do you think of this approach? If we were to set out an annual housing requirement what should it be based on? Should we use the Structure Plan Third Alteration requirement to 2016?

Are there any other ways in which we should be tackling the issue of housing provision? We would like to know what you think.

Core Policy 2 could also be extended to include the Council's affordable housing requirement. A recent Housing Needs Survey for Gloucester carried out by Outside Research, shows that there is a net annual shortfall of 1,234 affordable houses in Gloucester. To put this in context, the average number of new houses completed per year in Gloucester between 1997 and 2002 was just 412. Clearly therefore there is an acute need for affordable housing.

Core Policy 2 could therefore, in addition to the overall amount of housing to be provided in Gloucester, set out the Council's requirements in relation to affordable housing provision.

Emerging Government Guidance suggests that affordable housing should be sought on schemes of 15 or more dwellings or sites of 0.5 hectares or more irrespective of the number of dwellings. Notably this is the current policy approach set out in the Second Deposit Draft Local Plan (2002).

What do you think of this approach? Should we be using this as the threshold at which we seek affordable housing provision?

An alternative would be to drop the threshold to 5 dwellings. This would help to address the acute level of need identified in the recent housing needs survey, and would offset to some extent the fact that often with new housing in Gloucester, the level of affordable housing provision is reduced due to the abnormal site constraints and development costs associated with brownfield land.

In terms of the amount of affordable housing to be provided, the current policy approach is to seek affordable provision equivalent to 40% of the net site area.

In light of the housing needs survey outlined above we believe this to be the minimum level of provision. What do you think? Should we be looking to increase the requirement to 50% of the net site area?

An alternative approach would be to have a separate core policy on affordable housing provision. Do you think this topic needs to be dealt with through a separate policy or should it be incorporated into a more general housing policy as proposed?

CORE POLICY 3 – EMPLOYMENT LAND

This policy would set out the Council's approach towards the provision of new employment land and could also be extended to address the protection of existing employment stock.

Historically the County Structure Plan has stipulated that the City Council must allocate a certain amount of land for employment purposes. The requirement between mid 1991 and mid 2011 set out in the Adopted Structure Plan is 95 hectares. Current monitoring suggests that the City Council has a shortfall of approximately 30 hectares when future provision is set against this requirement.

However the adopted structure plan only covers the period to 2011 and the LDF will cover the period to 2016. To complicate matters, the most recent version of the Structure Plan – the third alteration, which does cover the period to 2016, does not specify a numerical target for provision. Instead, it emphasises the need to provide for a range and choice of employment sites to meet the projected needs of local businesses and new investment.

We would like your views on how best to plan for the provision of new employment land in Gloucester.

One option would be for the City Council to set its own target for the amount of employment land it expects to be built in the period to 2016.

This approach would have the advantage of providing a degree of numerical certainty over the amount of employment land required which in itself would assist the Council in allocating new employment land.

What do you think of this suggestion? Do we need a numerical target for employment land provision to add certainty to the process? If so, on what basis and/or evidence should we be developing this target?

A second option would be to introduce an employment target based on the net number of jobs to be created rather than the amount of floorspace. This has been done by several other local authorities although we believe it would prove extremely difficult to monitor a job-related employment target with any degree of accuracy.

What do you think of this idea? Should we be looking to develop a job-related employment target in preference to a target based on the amount of floorspace to be provided?

A third option would be to not specify a precise target for employment provision but to instead outline a general commitment towards seeking to meet the needs of local and other businesses. The amount of new employment land to be provided would then be agreed in more detail through consultation on the Council's 'site allocations and designations' document and area action plan for the Gloucester Heritage Urban Regeneration Company area.

What do you think? Should we pursue a non-target based approach and rely on the site allocations process to decide the level of provision in Gloucester?

Are there any alternative ways in which the City Council should be looking to address the issue of employment land provision? We would like to know what you think!

In light of likely employment land availability and the increasing pressure on existing employment sites, we believe this core policy also needs to address the loss of existing employment land. It could set out a general commitment to protecting such uses other than in exceptional circumstances and would be supported by a more specific criteria-based policy within the Council's Development Control Policies DPD.

What do you think? Should the protection of existing employment land be included as part of this Core Policy? If so should it set out the criteria against which proposals to redevelop employment land will be considered or should this be set out in the Development Control Policies document?

CORE POLICY 4 – TRANSPORT AND ACCESSIBILITY

This policy would stipulate the over-arching transport and accessibility requirements that the City Council would seek from new development (although clearly in some instances certain criteria will not apply). This could include whether the proposal would:

- Contribute to the implementation of the Gloucestershire Transport Plan
- Provide adequate highway infrastructure in order to mitigate the impact of the development
- Help reduce use of the private car
- Be accessible by a choice of means of transport
- In the case of large scale development be close to a major transport interchange

Should we be seeking to apply this type of over-arching policy to all development proposals? Should it apply to larger development only? Should this be a Core Policy?

CORE POLICY 5 – REGENERATION OF THE CENTRAL AREA

Core Policy 5 would outline the Council's commitment to the regeneration of the central area as per the proposed spatial strategy discussed earlier.

The policy could stipulate that new development must:

- Either be consistent with or not cause harm to the spatial strategy of central area regeneration

- Where the development would attract a large number of people it should be located in the central area unless it can be demonstrated that there are no suitable sites available

- Make the most efficient use of previously developed land and buildings

Does this need to be a Core Policy? Are there any other issues that this policy should be seeking to address?

CORE POLICY 6 – CITY CENTRE AND RETAIL DEVELOPMENT

This policy would set out a commitment towards the protection of Gloucester's Primary Shopping Area and other designated district and local centres.

The policy would set out a general presumption against out of centre development where there are sequentially preferable sites available.

Does this need to be a Core Policy or should it be dealt with through the Council's Development Control Policies document?

The policy could also be extended to set out how much additional retail floorspace the City Council expects to be developed in Gloucester in the period to 2016. This would be based on the advice of FPD Savills in their 2004 Retail Study Update.

Do you think the policy should be explicit in stating how much retail floorspace the Council expects to be built?

CORE POLICY 7 – MIXED USE DEVELOPMENT

This policy would set out the Council's commitment to mixed-use development in appropriate locations and in relation to appropriate types of use.

The promotion of mixed-use development is an established national policy and Government advice is that the core strategy should avoid duplicating national policy.

However with the spatial strategy emphasising the regeneration of the central area, we believe mixed-use development has an extremely important role to play in Gloucester and that it should be the subject of a Core Policy. What do you think?

CORE POLICY 8 – DESIGN AND DENSITY

This policy would stipulate the need for new development to be of the highest possible quality in terms of design and also to ensure that development makes the most efficient use of land in terms of the density of development particularly in the central area and close to good transport routes, shops and services.

Again although these are established national policy themes we believe they warrant inclusion within the core strategy. What do you think?

CORE POLICY 9 – COMMUNITY SAFETY

Unfortunately Gloucester has a higher than average crime rate. Whilst planning and development cannot directly address the root causes of crime it can help to reduce the opportunity for crime through good design and layout.

This policy could therefore set out a general requirement for new development to have regard to the issue of community safety.

Do you think this issue needs to be dealt with as a core policy or should we put it instead into the general Development Control Policies document?

CORE POLICY 10 – PROTECTION OF THE NATURAL AND BUILT ENVIRONMENT

This policy would adopt a general approach of resisting development that would cause harm to the natural or built environment of the city. It could apply to Sites of Nature Conservation Interest, Landscape Conservation Areas, the River Severn Floodplain, Conservation Areas, Scheduled Ancient Monuments, Listed Buildings and any other site or building of acknowledged importance.

The policy would be supplemented by more detailed policies within the Council's Development Control Policies document.

CORE POLICY 11 – COMMUNITY PROVISION

This policy would set out general support for the provision of new community facilities and a general commitment towards the protection of existing facilities including schools, surgeries, meeting places, community centres, youth centres and so on.

The policy would be supplemented by a separate policy within the Council's development control policies DPD setting out in detail the criteria against which the provision and protection of community facilities will be considered.

Are there any other issues not mentioned above that need to be taken into account? Should this be a Core Policy?

CORE POLICY 12 – ACCESS TO SHOPS AND SERVICES

This policy would seek to support development that would lead to an improvement in people's access to shops and services including jobs, housing, health, education, shops, leisure and community facilities, open space, sport and recreation.

CORE POLICY 13 – SPORT AND RECREATION

This policy would set out a general strategic commitment towards resisting the loss of existing sport and recreational facilities in Gloucester other than in exceptional circumstances. It could apply to indoor sports facilities, playing fields, play facilities and other areas of public open space.

Are there any other types of facility it should apply to?

The policy could also set out a general commitment towards providing new sport and recreational facilities through new development.

In this regard, the policy could also contain within it the Council's requirements for new open space provision as part of development. The current approach is to seek provision from both housing and employment uses.

Do you think this is appropriate? Should we be seeking provision from other uses too?

In terms of the size of development from which provision is sought, we currently only seek public open space provision from larger developments.

One option would therefore be to apply the requirement to all developments on a 'pro-rata' basis so that even individual or pairs of new dwellings would make a proportionate contribution.

The justification for this would be that on a cumulative basis even small schemes increase the pressure on existing public open space.

What do you think? Should the requirement apply to all sizes of development?

In relation to the level of provision of new public open space, the current approach is to seek a minimum of 2.8 hectares per 1,000 population or 28 sq m per person in residential development.

This exceeds the standard of 2.4 hectares per 1,000 advocated by the National Playing Fields Association. The justification for this is that increasing residential densities will limit garden sizes, which in turn will put more pressure on public open space.

We believe the higher standard remains valid and should be used in securing new open space through the Core Strategy. What do you think? Should we increase the requirement further?

In terms of employment development the current approach is to seek on larger sites 5% of the total site area or 0.2 hectares whichever is the larger for formal and passive recreation.

Does this approach seem reasonable? Should we be seeking open space provision from employment development? Should we increase the requirement to 10%?

The policy would be supplemented by two, more detailed policies within the Council's Development Control Policies DPD.

CORE POLICY 14 – DEVELOPER CONTRIBUTIONS

This policy would stipulate that in appropriate circumstances the City Council will seek to enter into a legal agreement with a developer or landowner in order to ensure that the impact of development is mitigated through the provision of appropriate infrastructure and community services where this is reasonable and related to the development.

The policy could set out a list of the requirements that are likely to be sought from new development including affordable housing, education contributions, public open space etc.

However as this is generally a matter for assessment and negotiation on a site-by-site basis, we do not think it would be appropriate to be that specific. What do you think?
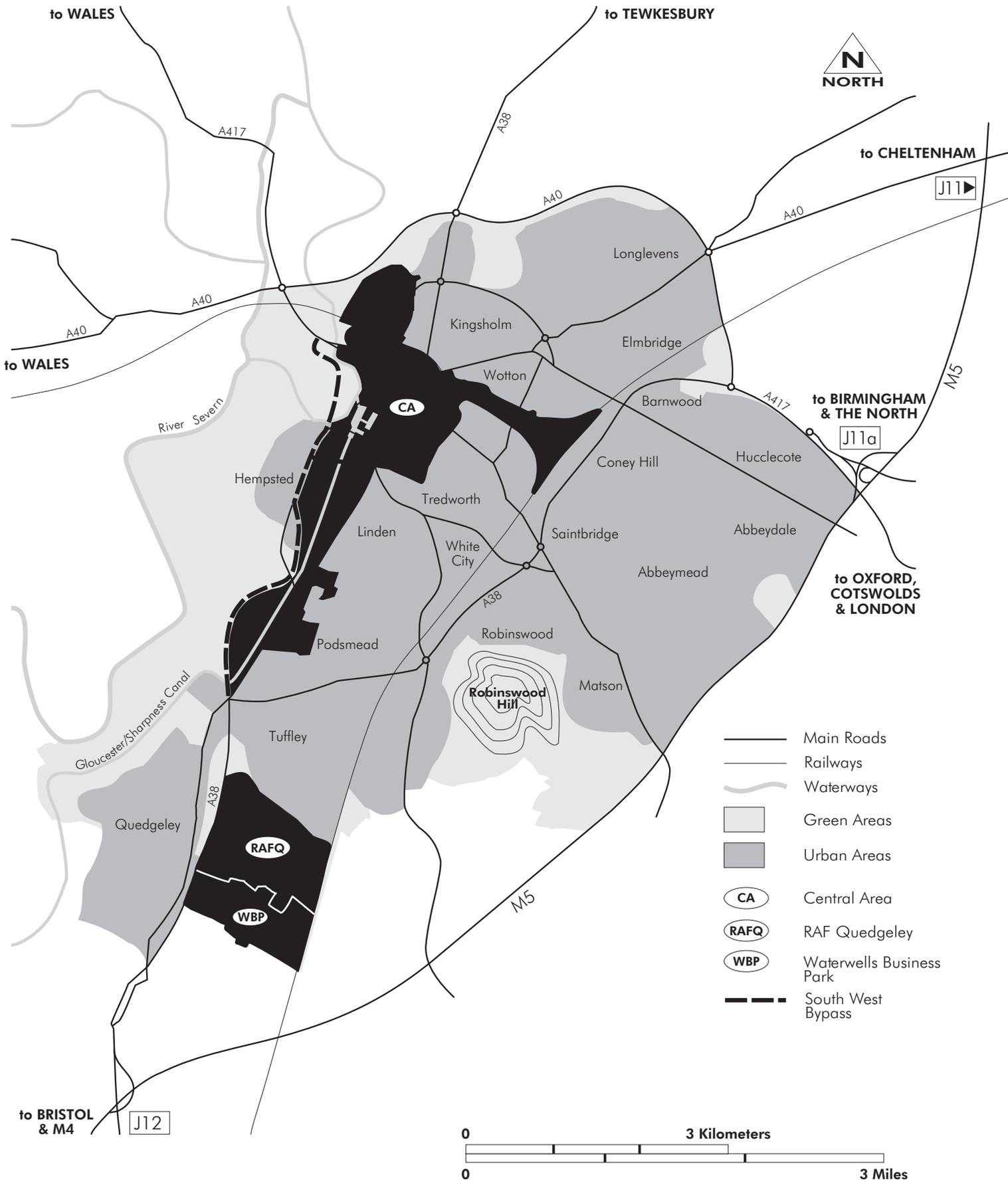
8. MONITORING AND IMPLEMENTATION

8.1 The new system of local development frameworks is intended to be responsive to change with individual documents able to be reviewed independently of others.

8.2 A pre-requisite of this flexible new system is effective monitoring so that the impact of policies and proposals can be measured with certainty, which in turn will allow decisions to be made to maintain or review policies.

8.3 In line with this objective the Core Strategy is required to include within it a Monitoring and Implementation Framework setting set out how the City Council intends to monitor the progress of the Local Development Framework and the degree to which its policies and proposals are being implemented.

8.4 We are not consulting in detail at this stage on a proposed Monitoring and Implementation Framework, however in broad terms the framework will address the following matters:

- The extent to which policies/proposals are achieving their objectives

- Whether these policies are delivering sustainable development

- Whether policies have had or are having unintended consequences

- The impact of policies in terms of national, regional and local policy targets

- The extent to which the assumptions and objectives behind policies/proposals are still relevant

- Where policies have not been implemented, the reasons for this and what steps need to be taken (e.g. policy revised or deleted)

- The significant effects of implementing policies and proposals; and

- How policies/proposals are performing against sustainability objectives and targets.

8.5 The Council intends to base its approach on established methodology used by regional planning bodies in their assessment of Regional Planning Guidance.

8.6 This is commonly referred to as the **'objectives – policies – targets – indicators'** approach and involves firstly establishing clear and specific objectives, which in turn guide the selection and measurement of meaningful indicators and targets.

8.7 The framework will identify which organisations and agencies are responsible for each policy area and will through a series of different types of indicator (contextual, core output, local output and significant effect indicators) seek to identify the extent to which policies and proposals are being implemented.

8.8   We would like to know if you have any views on the broad approach towards monitoring and implementation set out above. Are there any other issues we should be looking to take into account in assessing the implementation of the Gloucester Local Development Framework?

9.   NEXT STEPS

9.1   This issues and options paper will be the subject of a rolling consultation between **25th April and 11thJuly 2005**.

9.2   Responses received during the first four weeks of this period (i.e. between **25th April and 23rd May**) will be taken into account by Officers and the paper will be re-published in more detail for further comment between **13th June and 11th July 2005.**

9.3   A preferred options consultation on the Core Strategy will then take place in **October 2005.**

Appendix 1. Key Diagram

N
NORTH

to WALES

to TEWKESBURY

to CHELTENHAM

J11▶

A417

A38

A40

A40

A40

Longlevens

J11a

to BIRMINGHAM
& THE NORTH

M5

to WALES

A40

Kingsholm

Elmbridge

Wotton

Barnwood

A417

Hucclecote

River Severn

CA

Coney Hill

Abbeydale

Hempsted

Tredworth

Saintbridge

to OXFORD,
COTSWOLDS
& LONDON

Linden

White
City

Abbeymead

A38

Robinswood

Podsmead

Robinswood
Hill

Matson

Gloucester/Sharpness Canal

Tuffley

M5

Quedgeley

RAFQ

A38

WBP

to BRISTOL
& M4   J12

Main Roads

Railways

Waterways

Green Areas

Urban Areas

CA   Central Area

RAFQ   RAF Quedgeley

WBP   Waterwells Business
Park

▬ ▬ ▬   South West
Bypass

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0   3 Kilometers

0   3 Miles