

Pre-Submission Gloucester City Plan Consultation Statement September 2019

1. Introduction

1.1. This Consultation Statement sets out how Gloucester City Council has undertaken public and stakeholder consultation and engagement in preparing the Pre-Submission Gloucester City Plan (GCP), in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2. Regulation 18 states:

Preparation of a Local Plan

18. (1) A local planning authority must—

- a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

- c) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- d) such of the general consultation bodies as the local planning authority consider appropriate; and
- e) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

1.3. This consultation statement summarises how the City Council consulted and who was invited to make representations in accordance with Regulation 18. Furthermore, the statement sets out the main issues that were raised and how these representations were taken into account in the production of the Pre-Submission (Regulation 19) GCP.

2. Previous consultations

2.1. The GCP has been prepared over several years and has been through a number of different stages, always staggered slightly behind the Joint Core Strategy (adopted December 2017). At each stage, there has been engagement with the community and stakeholders on what the content of the GCP should be and in order to generate comment and debate on draft proposal as they emerge. The process to date has been as follows:

- (1) **Scope – 2011:** This consultation set out the context for the plan and the key issues for Gloucester. It sought views on the types of planning policies that the GCP should contain and the areas that should be identified for development or protection.

- (2) **Part 1 – 2012:** This stage of the plan took the scope further, providing further detail of the issues that Gloucester faces and setting out a number of ‘key principles’ that should be taken forward through the GCP.
- (3) **Part 2 – 2013:** This stage of the plan focused on the development needs of the city and considered potential site allocations.
- (4) **Draft Plan – 2017:** This stage of the plan pulled the previous stages of the plan together, drawing on the outcomes of the different consultations to set out a range of proposed site allocations and detailed policies.

2.2. At each stage, public consultation was undertaken in accordance with the City Council’s adopted Statement of Community Involvement (SCI). Table 1 below sets out the position when consulting on Development Plan Documents.

Table 1. Consultation arrangements for Development Plan Documents – as per Gloucester City Council’s adopted SCI			
Stage	Preparation	Who	How
Preparation of a local plan (Regulation 18)	Evidence gathering	Specific and general consultees Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate	Letter, email, internet, forums,
Publication of a local plan (Regulations 19 and 20)	Consult on proposed submission document	Specific and general consultees Those registered on Council’s database Any other residents wishing to make representations, or other persons carrying out business in the area that the Council considers appropriate	Letter, email, internet, press releases, exhibitions, questionnaires, forums, events, deposit locations
Submission of documents and information to the Secretary of State (Regulation 22)	Submission of Local Plan and all associated documents in accordance with Regulation 22	Specific and general consultees Those registered on the Council’s database	Letter, email, internet, deposit locations

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

- 2.3. At each stage of the process, the main consultation document and relevant supporting information was made available on the City Council's website, along with an online responses system and downloadable response forms for completion and sending back. Hard copies were made available in all deposit locations; the City Council Reception, Guildhall, Tourism Information Centre and all location libraries.
- 2.4. To raise awareness of the consultation and encourage engagement, the following activities were undertaken:
- (1) Emails/letters to all statutory and non-statutory consultees (See Appendix 1 for a list of the specific consultation bodies) and local people, businesses, community groups, landowners, developers and agents who had requested to be notified of planning policy consultations;

- (2) Press release;
- (3) Elected Member notification; and
- (4) Social media updates.

2.5. Each consultation was further supported by public events, tailored to its scope and content.

3. Evolution and progress of the GCP

3.1. The following section 3 sets out further detail in relation to the scope and content of the consultation, representations received and how they informed the emerging GCP. Full details of each of the consultations and response reports providing detail of the representations and how they were taken into account in producing the next stage in the evolution of the GCP is available to download from the City Council website at www.gloucester.gov.uk/cityplan.

Scope GCP - 2011

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

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

3.3. The consultation response report is available to download at the following link - <https://www.gloucester.gov.uk/media/1331/cp-consultation-report-latest-oct-2011.pdf>.

Part 1 GCP – 2012

Context and Key Development Principles

3.4. Part 1 of the GCP took forward the responses from the Scoping consultation and presented a range of different challenges the plan should seek to address, an indicative strategy and 13 Key Principles to deliver the strategy. The consultation sought feedback on the challenges, strategy and key development principles in order to inform the next stage of the plan. Consultation was held between 5th March and 13th April 2012.

- 3.5 The consultation response report is available to download at the following link - https://www.gloucester.gov.uk/media/1334/city_plan_part_1_response_report.pdf.

Part 2 GCP – 2013

Places, Sites and City Centre Strategy

- 3.6 Part 2 of the GCP began the process of consulting on development need and opportunities based on a range of known site opportunities. It also considered issues and opportunities on ward-by-ward basis and presented a City Centre Vision and Strategy. Consultation was held between 13th May and 12th July 2013 and included 18 community consultation events, spread across the city. The consultation events were independently facilitated by a local organisation called the Gloucestershire Rural Community Council, which has a particular specialism in community consultation.
- 3.7 The consultation response report is available to download at the following link - <https://www.gloucester.gov.uk/media/1337/city-plan-part-2-response-report.pdf>.

Draft GCP 2017

- 3.8 The Draft GCP was the first time the plan was presented for consultation in its entirety, informed by the previous three consultations and the emerging evidence base. It includes a draft Vision, Key Principles, proposed site allocations, draft development management policies and a policies map. The formal consultation lasted for six weeks between 16th January and 27th February 2017 and was supported by six public consultation events; two in the city centre and three at supermarkets around the city. The consultation itself didn't ask specific questions but instead sought feedback on the Draft Plan's content and the evidence.
- 3.9 The consultation response report is available to download at the following link - <https://www.gloucester.gov.uk/media/2807/response-report-final-14082017.pdf>. In addition, the consultation document included a summary of previous responses received to some of the proposed site allocations.

Beyond the Draft GCP 2017 - 2019

- 3.10 From March 2017 work was undertaken to analyse the various stakeholder and consultee responses. Following this, new sites were considered (as they were submitted through the SALA process) and changes were made to the plan reflecting changes to the NPPF and the strategic direction of the City Council. It is also important to point out that at this point in the process, the JCS examination had reached an advanced stage and it was clear that main modifications to the plan were going to provide a much stronger focus on retail and city/town centres. In addition, that the JCS authorities committed to undertaking an immediate review of this strategic matter as a JCS, which has now commenced. This means that some of the policies consulted on at Draft stage were not carried forward to Pre-Submission as they were unnecessary (for example being now adequately addressed through the JCS), whilst it has been necessary to create some new policies.
- 3.11 Appendix 2 of this report provides a schedule of policies contained within the Pre-Submission GCP along with a headline summary of changes made since the Draft GCP, including where new policies have been created. Appendix 3 provides the rationale for

changes in site allocations (i.e. those that remain allocated between Draft and Pre-Submission, those that are no longer allocated, and those that are new allocations).

Appendix 1: Statutory and Stakeholder Consultation Bodies

Statutory

1. Coal authority
2. Environment Agency
3. Historic England
4. Marine Management Organisation
5. Natural England
6. Network Rail Infrastructure Limited
7. Highways England
8. Gloucestershire County Council
9. Forest of Dean District Council
10. Stroud District Council
11. Cheltenham Borough Council
12. Cotswold District Council
13. Tewkesbury Borough Council
14. British Telecom
15. Vodafone
16. Virgin Media
17. Telewest
18. Gloucestershire Clinical Commissioning Group
19. Gloucestershire Hospitals NHS Foundation Trust
20. Gloucestershire NHS Health and Care Trust
21. NHS South Western Ambulance Service Trust
22. National Grid
23. Western Power Distribution
24. Wales and West Utilities
25. Severn Trent Water
26. Thames Water
27. Ministry for Housing, Communities and Local Government
28. Department for Digital, Culture, Media and Sport

29. Department for Farming and Rural Affairs
30. Ministry of Defence
31. Homes England

Other consultees

National / regional organisations

32. AGE UK
33. British Sign and Graphics Association
34. Campaign for the Protection of Rural England (CRPE)
35. Campaign for Real Ale
36. Canal and River Trust (formerly British Waterways)
37. Civil Aviation Authority
38. Defence Infrastructure Organisation
39. EDF Energy
40. Education and Skills Funding Agency
41. Forestry Commission
42. Federation of Small Businesses
43. Freight Transport Association
44. Friends, Families and Travellers
45. Great Western Railways
46. Health and Safety Executive
47. Home Builders Federation
48. Marine Management Organisation
49. Mobile UK (formerly Mobile Operators Organisation)
50. National Farmers Union
51. National Federation of Gypsy Liaison Groups
52. National Playing Fields Association
53. National Rail Property
54. National Trust

55. Office of Rail and Road
56. Sustrans
57. Ramblers Association
58. Royal Society for the Protection of Birds
59. Showmen's Guild of Great Britain
60. South West HARP Planning Consortium
61. Sport England
62. Theatres Trust
63. Woodland Trust

County / City organisations

64. Active Gloucestershire
65. Aspire Sports and Cultural Trust
66. Barnwood Community Partnership
67. Barnwood Trust
68. Barton / Tredworth Neighbourhood Partnership
69. Brockworth Parish Council
70. Bromford Housing
71. Brookthorpe with Whaddon Parish Council
72. Churchdown Parish Council
73. Cotswold Conservation Board
74. Diocese of Gloucester
75. Elim Housing
76. Elmbridge Neighbourhood Partnership
77. Elmore Parish Council
78. Friends of Alney Island
79. Gloucester Chamber of Commerce
80. Gloucester Charities Trust
81. Gloucester City Centre Community Partnership
82. Gloucester City Homes

83. Gloucester Civic Trust
84. Gloucestershire Association of Parish and Town Councils
85. Gloucestershire Constabulary
86. Gloucestershire Environmental Trust
87. Gloucestershire Football Association
88. Gloucestershire Fire and Rescue Service
89. Gloucestershire Lead Local Flood Authority
90. Gloucestershire First Local Enterprise Partnership (GFirst)
91. Gloucestershire Local Medical Committee
92. Gloucestershire Local Nature Partnership
93. Gloucestershire Orchard Trust
94. Gloucestershire Playing Fields Association
95. Gloucestershire Rural Community Council
96. Gloucestershire Voluntary and Community Sector Alliance
97. Gloucestershire Wildlife Trust
98. Green Square Group
99. Guinness Partnership
100. Hardwick Parish Council
101. Haresfield Parish Council
102. Hartpury College and University
103. Hempsted Residents Association
104. Highnam Parish Council
105. Hucclecote Community Association
106. Hucclecote Parish Council
107. Innsworth Parish Council
108. Kingsholm and Wotton Neighbourhood Partnership
109. Llanthony Secunda Priory Trust
110. Longford Parish Council
111. Longlevens Neighbourhood Partnership
112. Lower Severn Internal Drainage Board
113. Maisemore Parish Council

114. Minsterworth Parish Council
115. Muslim Community of Gloucester / Muslim Welfare Association
116. Podsmead Big Local
117. Quedgeley Town Council
118. Rooftop Housing Group
119. Roots Coffee and Community
120. Sanctuary Housing
121. Severn Wye Energy Agency
122. South Western Ambulance Service Trust
123. Sovereign
124. Stagecoach West
125. The Venture: White City CIC
126. Three Bridges Neighbourhood Partnership
127. Together in Matson
128. Two Rivers Housing
129. University of Gloucestershire
130. Upton St Leonards Parish Council
131. Young Gloucestershire

General contacts database

Developers

Planning consultants

Agents

Members of the community

Appendix 2: Policy evolution/changes – Reg.18 draft to Reg.19 version for consultation

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

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

Policy B2: Safeguarding employment sites and buildings	Merge of previous employment policies and amended to reflect new evidence.
Policy B3: New employment development and intensification and improvements to existing employment land	Merge of previous employment policies and amended to reflect new evidence.
Policy B4: Development within and adjacent to Gloucester Docks and Canal	Created in response to DGCP comments from Canal and River Trust
Policy B5: Tourism and culture	Created in response to DGCP comments from the Culture Trust.
C. Healthy Communities	
Policy C1: Active design and accessibility	Merge of DGCP Policies D1 and D3, now refers to Sport England's 'Active Design' guidance (or future iteration).
Policy C2: Allotments	Previously Policy D4. Amended to reflect current position regarding opportunities to new allotments.
Policy C3: Public open space, playing fields and sports facilities	Merge of DGCP Policies D5, D6, D7 and amended to reflect Playing Pitch Strategy, Built Sports Strategy and Open Space Strategy.
Policy C4: Hot food takeaways	Previously Policy D9. Expanded to cover all forms of takeaway. Additional 400m exclusion zone around secondary schools/colleges (not including designated centres).
Policy C5: Air Quality	Previously Policy D10. Expansion to include new criteria and mitigation options to reflect the fact that Gloucester has several Air Quality Management Areas and congestion in a built-up urban area.
Policy C6: Cordon Sanitaire	Previously Policy D14. 'Constraints area' replaced with 'Cordon Sanitaire. New evidence to inform extent of Cordon Sanitaire reflected on Policies Map.
Policy C7: Fall prevention from taller buildings	Previously Policy D15. New name. Requirement changed from number of storeys to metreage.
Policy C8: Changing Places toilets	Created in response to DGCP comment, Government direction of travel and local need.
D. Historic Environment	
Policy D1: Historic environment	Previously Policy E1. Reworded to make clearer, additional criterion relating to archaeology.

Policy D2: Non-designated heritage assets	Previously Policy E3. Name changed. Additional criteria for design and consideration of new builds and demolition of non-designated heritage assets.
Policy D3: Recording and advancing understanding of heritage assets	Previously Policy E2. Additional requirement added - method will depend on asset in question and developer required to disseminate information. Mitigation moved to justification.
Policy D4: Shopfronts, shutters and signs	Previously Policy E4. Additional criteria added to provide more direction.
Policy D5: Views of the Cathedral and historic places of Worship	Previously Policy G17. Reference to SPD moved to supporting text.
E. Natural Environment	
Policy E1: Landscape character and sensitivity	Previously Policy F1 'Landscape'. Additional reference to retaining trees and hedgerows in response to DGCP.
Policy E2: Biodiversity and geodiversity	Merge of DGCP Policies F2 and F6. Additional reference to ecological networks and criteria for internationally designated, nationally designated and locally designated sites (at request of Natural England).
Policy E3: Nature Recovery Area	Previously Policy F3 'Nature Improvement Area'. Created in dialogue with Gloucestershire Wildlife Trust.
Policy E4: Trees, woodlands and hedgerows	Previously Policy F4. Expanded to include woodlands in response to DGCP. Now requires protection, incorporation, measurable net gains and protection through development phases.
Policy E5: Green Infrastructure: Building with Nature	Previously Policy F5. Expanded to include reference to Buildings with Nature standards (previously in supporting text).
Policy E6: Flooding, sustainable drainage and wastewater	Previously Policy F7. In consultation with Severn Trent and the Environment Agency, expanded to reference sustainable drainage (incorporating DGCP Policy F10) (now requires SUDS), watercourse restoration, wastewater discharge, financial contribution (in exceptional circumstances) to flood risk infrastructure.
Policy E7: Renewable energy potential of the River Severn and the canal	Previously Policy F8. Additional requirement to consider impact on commercial/leisure uses and biodiversity/riparian habitats.
Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation	Created in response to dialogue with Natural England re: Habitats Regulations and potential impacts on Cotswold Beechwoods Strategic Area of Conservation.
F. Design	
Policy F1: Materials and finishes	Previously Policy G3. Added reference to 'innovative modern materials will be supported where they would complement distinctiveness'.
Policy F2: Landscape and planting	Previously Policy G4. Added 'Where appropriate...'. No significant change to policy wording.

Policy F3: Community safety	Previously Policy G9. No significant change to policy wording; protecting against malicious threats included in the reasoned justification.
Policy F4: Gulls	Previously Policy G15. No significant change to policy wording.
Policy F5: Open plan estates	Created in response to DGCP to reflect a very locally specific design issue.
Policy F6: Nationally described space standards	Created to reflect new NPPF requirement / opportunity aligned with local evidence.
G. Sustainable Living, Transport and Infrastructure	
Policy G1: Sustainable transport	Created in response to growing concern around climate change and that the City Council has declared a climate emergency. Expanded and reframed since DGCP.
Policy G2: Charging infrastructure for electric vehicles	Additional text/requirements
Policy G3: Cycling	Created partly in response to DGCP, as well as opportunity in response to climate change
Policy G4: Walking	Created in response to LTP / climate change emergency. Protecting/incorporating opportunities for cycling
Policy G5: Broadband connectivity	Created in response to LTP / climate change emergency. Protecting/incorporating opportunities for walking
Policy G6: Telecommunications infrastructure	Created in response to a locally identified policy need.
Policy G7: Water efficiency	Created in response to IDP, working with Severn Trent / Environment Agency. Evidence of local water issues
Policy G8: Review mechanism	Created in to reflect NPPF requirements

Appendix 3: Site evolution/changes – Reg.18 draft to Reg.19 version for consultation

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

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

			SA14: Land off New Dawn View
			SA15: Land south west of Winneycroft Allocation
			SA16: Land off Lower Eastgate Street
			SA17: Land south of Triangle Park (Southern Railway Triangle)
			SA18: Jordans Brook House
			SA19: Land off Myers Road
			SA20: White City Community Facility
			SA21: Part of West Quay, the Docks
			SA22: Land adjacent to Secunda Way Industrial Estate