

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

between

Gloucester City Council & Gloucestershire County Council as Minerals & Waste Planning Authority

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Gloucester City Council and Gloucestershire County Council as Minerals & Waste Planning Authority (MWPA) referred to hereafter as “the parties”. It documents matters which are agreed and not agreed by the parties with regard to certain policies and sites in the Pre-Submission Gloucester City Plan (GCP).
- 1.2 This SoCG is provided without prejudice to other matters of detail that the parties may wish to address at the examination.

2. Background

- 2.1 The County Council as MWPA have been consulted at all stages of preparation of the GCP, including:
- The Scope (2011)
 - City Plan Part 1 (2012)
 - City Plan Part 2 (2013)
 - Draft Gloucester City Local Plan (2017)
 - Pre-Submission Gloucester City Plan (2019)

3. Matters on which the parties agree

- 3.1 The City Council has engaged with the County Council MWPA in the preparation of the Plan through formal and informal consultation and as such the Duty to Cooperate has been fulfilled. The parties agree to continue to work positively together.
- 3.2 In response to representations submitted to the Pre-Submission GCP, the following proposed changes are agreed between the parties. For ease of use, reference is provided to the relevant entry in Submission Document CD010a ‘Schedule of changes – Pre-Submission Gloucester City Plan Addendum’. Further information is also provided in CD010d ‘Summary of Representations with Officer Response’, and a tracked changed version of the Pre-Submission GCP, highlighting the proposed changes, is available at Submission Document CD010b.
- 3.3 [Planning for Gloucester | Context | Paragraph 2.16](#)

The MWPA consider paragraph 2.16 should be amended to ‘...acknowledge the well-established land-use planning link between promoting resource efficiency and waste reduction and seeking to achieve climate change ambitions. In response, it is proposed the last sentence in this paragraph will be amended as follows (PM004):

‘The JCS and GCP contain policies that will require new development to be designed in ways that promote the *efficiency use of resources and waste reduction, greater* use of sustainable

transport, uplift in the generation of renewable energy, provide tree planting, create and connect to public open spaces and multi-functional green infrastructure, make use of Sustainable Urban Drainage Systems and opportunities to improve flood risk and manage it better, and to deliver improvements and net gains to biodiversity.'

3.4 Key Principles | Key Principle 1, Paragraph 2.21

The MWPA consider that Key Principle 1 should be amended so that the '...efficient use of resources and waste reduction are brought under the umbrella of the city's 'transformation' agenda. In response, it is proposed that Key Principle 1 be amended as follows:* (PM005):

'Key Principle 1

Ensure that new development contributes to the delivery of a transforming, *low carbon city which is resilient and adaptable in a changing climate*, brings regeneration benefits, promotes sustainable development, *incorporating measures to reduce waste, and* makes the most efficient use of brownfield land and the reuse of vacant *and underused buildings and space.*'

**Please note these amendments incorporate other concerns raised by the Environment Agency and the Woodland Trust in relation to climate change.*

3.5 Policy B2 | Safeguarding employment sites and buildings

The MWPA consider Policy B2 doesn't incorporate the strategically significant matter of supporting the local network of sustainable waste management infrastructure / facilities through safeguarding. It is considered waste management infrastructure / facilities should be afforded at least the same safeguarding provisions as B-Class employment. In response, it is proposed that additional wording at paragraph 3.2.16 of the supporting text, as follows (PM005):

*'...It applies to all existing employment land and premises, consented employment land and premises, and allocations made in the GCP. **Waste management infrastructure and facilities may be considered in the same way as B-class employment development for the purposes of Policy B2.**'*

3.6 Policy B3 | New employment development and intensification and improvements to existing employment land

The MWPA consider Policy B3 doesn't incorporate the strategically significant matters of implementing waste minimisation and safeguarding the network of sustainable waste management infrastructure / facilities. To an extent, the City Council considers these matters are covered in the adopted Waste Core Strategy (2012), however, it is proposed that additional text be provided at Criterion 3, a new Criterion 6 is provided and additional supporting text at 3.2.22, as follows (PM014):

'3. The proposal would not result in significant adverse impact on the amenity of neighbouring uses, particularly residential properties and *it would not place unreasonable operational restrictions on adjacent existing or allocated land uses.*'

6. Provision is made for the delivery of efficient and effective and commercial waste collection services.'

3.2.22 With regards to waste collection from employment sites the City and County Council wish to see high quality facilities which support the implementation of the waste hierarchy and encourage the practices of resource efficiency and waste reduction.'

3.7 Policy C4 | Hot food takeaways

The MWPA partly support the provisions of Policy C4 but consider it would benefit from being more prescriptive and better aligned with established local policy ambitions relating to the future management of waste. The City Council considers the substantive matter is already dealt with in the policy text at point 4, but it is proposed that the importance of effective waste management be emphasised with the following addition to the supporting text (PM026):

'3.2.25 Hot food takeaways can often generate significant levels of local litter and waste. The Council will expect efficient and effective commercial waste collection services that support the implementation of the waste hierarchy and encourage resource efficiency and waste reduction.'

3.8 Policy C6 | Cordon sanitaire

The MWPA partly support the provisions of Policy C4 but consider it should not be restricted to the matter of 'smell' only and should cover all potential land-use compatibility issues. It should also better accommodate the future requirements of Netheridge Sewage Treatment Works, which could change from those identified in the supporting text. In response, it is proposed that additional supporting text, as follows (PM032):

'3.3.35 All development within the defined Cordon Sanitaire must demonstrate by way of suitable mitigation measures how it will not cause unreasonable restrictions upon existing sewage treatment operations. This includes the effective management of odour nuisance and the ability to achieve future sustainable development of reliable waste infrastructure over the time horizon of the City Plan.'

3.9 Policy F1 | Materials and finishes

The MWPA consider that, in light of previous comments, Policy F1 should be amended to promote the strategically important land-use matters such as resource efficiency and management of waste. In response, it is proposed that additional supporting text, as follows (PM059).

'3.6.9 Innovative design and use of materials should be encouraged where it promotes sustainable, low-carbon, resource efficient and waste reducing practices whilst complementing greater local distinctness and aesthetic value within the built environment.'

3.10 Site Allocations

The MWPA has requested that the site allocation policies include, where relevant, additional text relating to minerals and waste considerations. In the interests of clarity, it is proposed that the following additional text is added to the following policies.

		Relevant site allocations
Minerals Consultation Area	<p>Add:</p> <p><i><u>'Minerals Consultation Area (MCA)</u></i> <i>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand and gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.'</i></p>	<p>SA01: Land at The Wheatridge (PM079) SA02: Land at Barnwood Manor (PM080) SA03: Former Prospect House (PM081) SA04: Former Wessex House (PM084) SA05: Land at Great Western Road Sidings (PM085) SA07: Lynton Fields, Land East of Waterwells Business Park (PM086) SA08: King's Quarter (PM087) SA10: Former Fleece Hotel Ladybellgate Street Car Park (PM089) SA11: Land rear of St Oswalds Retail Park (PM090) SA12: Land at Rea Lane, Hempsted (PM092) SA13: Former Colwell Youth & Community Centre (PM093) SA16: Land off Lower Eastgate Street (PM0095) SA17: Land South of Triangle Park (PM096) SA18: Jordan's Brook House (PM099) SA19: Land off Myers Road (PM100) SA20: White City Community Facility (PM101)</p>
Mitigation Measures	<p>Add:</p> <p><i><u>'Mitigation measures</u></i> <i>Due to the presence of nearby safeguarded mineral and waste infrastructure sufficient mitigation measures should be put in place to avoid unacceptable land-use incompatibility issues arising.'</i></p>	<p>SA05: Land at Great Western Road Sidings (PM085) SA13: Former Colwell Youth & Community Centre (PM093) SA17: Land South of Triangle Park (PM096) SA19: Land off Myers Road (PM100)</p>
Land contamination	<p>Add:</p> <p><i><u>'Land contamination</u></i> <i>The site allocation lies within an area subject to historic unlicensed landfill activity. Consequently, an appropriate land contamination risk assessment and options appraisal may be required. Early engagement with the Environment Agency in respect of this matter is strongly encouraged.'</i></p>	<p>SA11: Land rear of St Oswalds Retail Park (PM090)</p>

4. Matters on which the parties are not agreed

4.1 Policy A1 | Effective and efficient use of land and buildings

The MWPA requested a specific change to Criterion 5 of this policy to prevent the sterilisation of underlying mineral resources and meet waste infrastructure safeguarding requirements. The Council do not consider this is necessary as these matters are appropriately covered in Policy SD3: *Sustainable Design and Construction* Point 4 of the adopted JCS (2017) and in Policy WCS11: *Safeguarding Sites for Waste Management* of the adopted Waste Core Strategy (2012).

4.2 Policy A3 | Estate regeneration

The MWPA requested a specific addition to this policy, as follows: 'The proposal will facilitate the delivery of transformative household waste collection services that will be of a high quality, comprehensive and efficient and effective in achieving local authority waste management targets.'

However, the Council do not consider would be appropriate for the following reasons:

1. It is likely that when estate regeneration occurs in Gloucester it has the potential to be piecemeal rather than large scale and 'all at once'. In each area there are only a number of pockets of development proposed. There is a danger that there could be the introduction of two systems in the same area. The City Council are the waste collection authority and there is no current indication that the Council are proposing a new system on estates or in any other part of the city.
2. It is further considered that these matters are appropriately covered in: City Plan Policy A1: *Effective and efficient use of land* – Point 7, JCS Policy SD3: *Sustainable Design and Construction* Point 3 and the various policies of the adopted Waste Core Strategy (2012) when read as a whole.

5. Conclusion

5.1 The parties agree that:

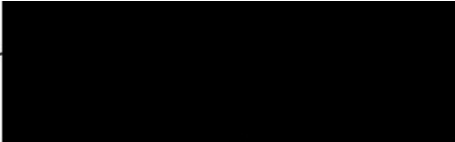
1. All matters raised in the MWPA's representations to the City Plan Regulation 19 consultation have been addressed, indicating agreement or disagreement;
2. Gloucester City Council has complied with the Duty to Co-operate in preparing the GCP through the various stages of plan-making;
3. With the proposed changes outlined in this statement, the GCP is consistent with the Gloucestershire Minerals Local Plan, JCS Policy SD3 and the National Planning Policy Framework; and
4. The parties will continue to work positively together and with all Gloucestershire local authorities and, where relevant, with neighbouring authorities on strategic cross boundary issues.

Signed on behalf of Gloucester City Council



Ian Edwards, Head of Place

Signed on behalf of Gloucestershire County Council as Minerals and Waste Planning Authority



Dated

18th March 2021