

GLOUCESTER CITY PLAN – DRAFT SCHEDULE OF PROPOSED CHANGES
SUBMISSION DOCUMENT CD010a
VERSION 3: UP TO 20/05/2021

Please note that all proposed main modifications will be subject to formal public consultation.

As such, these possible proposed modifications do not have any formal status and should not be treated as such.

The lack of any possible proposed modification should not be read to denote that the Inspector considers that a policy meets the test of soundness. Conversely, the inclusion of a possible proposed modification does not mean that the possible proposed modification meets the test of soundness or will be included within the Inspector's recommended main modifications.

The Inspector's recommended main modifications will accompany her report to the Council. This will be provided to the Council after she has received any representations in response to the formal public consultation on any main modifications, and she has been able to carefully consider the evidence which she has seen, heard and read during the examination of the submitted plan.

The following schedule sets out possible proposed changes to the Gloucester City Plan (GCP). It includes those provided by the City Council as part of the submission of the GCP in response to the Pre-Submission consultation, and those discussed through the examination hearings.

Where a possible proposed change has been amended through the hearing sessions, the original entry remains and it is followed by the possible proposed amended text, using the same reference but with the postfix 'A'.

This version of the schedule includes a row for potential changes that have been discussed at the examination, with the amended/additional text yet to be included. This will be provided at a later date and an update to this schedule published.

Following a review of the original submitted document, the Inspector has agreed that some of the changes can be considered a part of the submitted GCP. These have been clearly identified in the first column.

NOTE

- Proposed text to be deleted show in ~~strikethrough~~
- Proposed text to be inserted shown in *red italics*

CONTEXT / VISION / KEY PRINCIPLES

REF	Plan Reference	Respondents / Stage	Summary	Presubmission Text	Modification	Reason
PM001	Introduction and Overview	Planning Policy Team	Amend introductory text to reflect Submission.	<p>Responding to the consultation</p> <p>1.12 The City Council is consulting on the Pre-Submission Gloucester City Plan for a period of six weeks between 7 November and 20 December 2019. Responses (known as ‘representations’), can be made via the consultation portal at www.gloucester.gov.uk/cityplan. Alternatively, you may email your response to cityplan@gloucester.gov.uk or write to: Planning Policy Team, Gloucester City Council, PO BOX 3252, Gloucester, GL1 9FW.</p> <p>1.13 Copies of this document are available at all libraries within Gloucester City, the Gloucester City Council ‘Hub’ on Westgate Street and the Guildhall. Responses submitted to the consultation will be considered by an Independent Planning Inspector at a public examination. The role of the Inspector will be to examine whether the GCP is ‘sound’ and complies with the legal requirements. More information on the examination procedure has been produced by the Planning Inspectorate and is available from their website.</p> <p>1.14 If you wish to make a representation seeking a change to the GCP, in your response you should explain why the Plan is not sound and/or legally compliant. Where possible you should provide evidence to support your representation and make clear what changes need to be made as a result.</p> <p>1.15 Please note that your representation cannot be treated as confidential. As well as being sent to the Secretary of State, copies of all representations will be made available on the Council’s website. Your name and organization (if applicable) will be viewable. However, your contact details will be removed. If your representation is anonymous it cannot be taken into</p>	<p>Responding to the consultation Next steps</p> <p>1.12 The City Council is consulting consulted on the Pre-Submission Gloucester City Plan for a period of six weeks between 7 November and 20 December 2019 14 February 2020. Responses (known as ‘representations’), can be made via the consultation portal at www.gloucester.gov.uk/cityplan. Alternatively, you may email your response to cityplan@gloucester.gov.uk or write to: Planning Policy Team, Gloucester City Council, PO BOX 3252, Gloucester, GL1 9FW. The GCP has now been submitted to the Planning Inspectorate (Secretary of State) for Examination in Public. Copies of all Submission documents and further information on the examination process are available on the City Council’s website.</p> <p>1.13 Copies of this document are available at all libraries within Gloucester City, the Gloucester City Council ‘Hub’ on Westgate Street and the Guildhall. Responses submitted to the consultation will be considered by an Independent Planning Inspector at a public examination. The role of the Inspector will be to examine whether the GCP is ‘sound’ and complies with the legal requirements. More information on the examination procedure has been produced by the Planning Inspectorate and is available from their website.</p> <p>1.15 If you wish to make a representation seeking a change to the GCP, in your response you should explain why the Plan is not sound and/or legally compliant. Where possible you should provide evidence to support your representation and make clear what changes need to be made as a result.</p> <p>1.16 Please note that your representation cannot be treated as confidential. As well as being sent to the Secretary of State, copies of all representations will be made available on the Council’s website. Your name and organization (if applicable) will be viewable. However, your contact details will be removed. If your representation is anonymous it cannot be taken into account.</p> <p>What happens next?</p>	Amend introductory text to reflect Submission.

				<p>account.</p> <p>What happens next?</p> <p>1.16 Once the Pre-Submission consultation has ended, the responses and other required documentation will be submitted to the Planning Inspectorate. The timing of this will depend on the number of responses received to the consultation but it is expected this will happen before the end of 2019.</p> <p>1.17 As many of the strategic planning issues have already been addressed through the adopted Joint Core Strategy, it is hoped that the examination process for the Gloucester City Plan will not be lengthy; however, the exact timescale cannot be defined.</p>	<p>1.17 — Once the Pre-Submission consultation has ended, the responses and other required documentation will be submitted to the Planning Inspectorate. The timing of this will depend on the number of responses received to the consultation but it is expected this will happen before the end of 2019.</p> <p>1.18 — As many of the strategic planning issues have already been addressed through the adopted Joint Core Strategy, it is hoped that the examination process for the Gloucester City Plan will not be lengthy; however, the exact timescale cannot be defined.</p>	
PM002 To be considered as part of the Submitted Plan.	Context 2.4	Rob Curtis	Incorrect % of younger people. Incorrect link to Regeneration and Economic Development Strategy.	2.4 The population of Gloucester is relatively young with 24.8% of people being under the age of 19, the highest of all Gloucestershire districts, the South West and UK.	2.4 The population of Gloucester is relatively young with 24.6% of people being under the age of 19, the highest of all Gloucestershire districts, the South West and UK.	Amended to reflect the correct position as set out in the 2019 mid-year population estimates, published by ONS.
PM003 To be considered as part of the Submitted Plan.	Context 2.11	Gloucestershire County Council – Public Health	Add reference to add Gloucestershire Health & Wellbeing Strategy 2019-2030 as latest evidence base.	2.11 There are pockets of significant deprivation in the city and in some cases, these are worse than the national average. It is estimated that around 20% of children in the city live in poverty. Life expectancy is also lower than the rest of the country. From a public health perspective there are challenges and inequalities around issues such as inactivity, obesity, alcohol related harm, diabetes and drug misuse, suicide and attempted suicide, all of which are at higher levels than the national average. Planning for and developing strong, healthy and vibrant communities are vital in ensuring the physical and mental well-being of the city's residents.	2.11 There are pockets of significant deprivation in the city and in some cases, these are worse than the national average. It is estimated that around 20% of children in the city live in poverty. Life expectancy is also lower than the rest of the country. From a public health perspective there are challenges and inequalities around issues such as inactivity, obesity, alcohol related harm, diabetes and drug misuse, suicide and attempted suicide, all of which are at higher levels than the national average ¹³ . Planning for and developing strong, healthy and vibrant communities are vital in ensuring the physical and mental well-being of the city's Residents.	To include reference to the evidence base.
PM004	Context 2.16	GCC Minerals & Waste	Revise para 2.16	2.16 The JCS and GCP contain policies that will require new development to be designed in ways that promote the 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.	2.16 The JCS and GCP contain policies that will require new development to be designed in ways that promote the <i>efficiency use of resources and waste reduction, greater</i> 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.	In order to improve the plan and satisfy the concerns of the County Council as Minerals & Waste Planning Authority.

PM118	Context	Examination	Make clear there are sites in the administrative boundary that are 'strategic' (i.e. Winnycroft) and what policies apply.	TBC	TBC	Examination in public.
PM119	Context – 'What is the Gloucester City Plan'.	Examination	Confirm the GCP provides non-strategic policies only (the strategic framework provided by the Adopted JCS).	TBC	TBC	Examination in public.
PM005	Vision / Key Principles	Environment Agency The Woodland Trust GCC Minerals & Waste	Introductory paragraphs of the Plan and the Vision do not give sufficient weight to the issue of climate change or the commitment for carbon neutrality. Support reference to climate change Paragraph 2.21 – but not sufficiently translated into Vision statement or key principles. Suggested wording provided. Support principle related to environmental assets. Amend Key Principle 1 to address measures to reduce waste and make better use of underused buildings and space.	Vision New development will be built to the highest possible standard of design, focused on protecting the quality and local distinctiveness of the city, whilst responding to the implications of climate change. Key Principle 1 Ensure that new development contributes to the delivery of a transforming, city which brings regeneration benefits, promotes sustainable development, makes the most efficient use of brownfield land and the reuse of vacant buildings and space.	Vision New development will be built to the highest possible standard of design, focused on protecting the quality and local distinctiveness of the city, whilst responding to <i>and building resilience and adaptability</i> to the implications of climate change. Key Principle 1 Ensure that new development contributes to the delivery of a transforming, <i>low carbon</i> city which is <i>resilient and adaptable in a changing climate</i>, brings regeneration benefits, promotes sustainable development, <i>incorporating measures to reduce waste, and</i> makes the most efficient use of brownfield land and the reuse of vacant <i>and underused</i> buildings and space.	To strengthen the Vision and Key Principles in relation to Climate Change, which is reflective of policies within the GCP. To improve the sustainability of the plan and address the concerns of the County Council as Minerals & Waste Planning Authority and CPRE.
PM172	General context	Examination	Set out how each City Plan policy how it relates to the JCS policy framework.	TBC	TBC	Examination

A: HOUSING

REF	Plan Reference	Respondents / Stage	Summary	Pre-Submission Text	Modification	Reason
PM006	A1: Effective and efficient use of land and buildings Para 3.1.13	Development Management.		3.1.13 Where it is proposed to intensify an existing building (by conversion into flats or large House in Multiple Occupation) it is important to ensure that the proposal would not have a significant adverse impact on neighbouring properties or the wider area including its character. When assessing whether a proposed intensification of a dwelling would impact the character of the area consideration will be given to the number of existing of intensifications in the area. Applications that would result in a saturation of family homes converted into flats or HMOs will not be	3.1.13 Where it is proposed to intensify an existing building (by conversion into flats or large House in Multiple Occupation) it is important to ensure that the proposal would not have a significant adverse impact on neighbouring properties or the wider area including its character. When assessing whether a proposed intensification of a dwelling would impact the character of the area consideration will be given to the number of existing of intensifications in the area. Applications that would result in a saturation of family homes converted into flats or HMOs will not be permitted. Saturation is deemed to be reached if:	To future proof A1 should any Article 4 directions be made. With an Article 4 small HMO should be counted as they would require the benefit of planning permission.

				permitted. Saturation is deemed to be reached if: 1. It would result in any residential property (C3 use) being 'sandwiched' between two intensified properties; or 2. Intensified properties represent more than 10% of households within a 100-metre radius of the application property.	1. It would result in any residential property (C3 use) being 'sandwiched' between two intensified properties; or 2. Intensified properties represent more than 10% of households within a 100-metre radius of the application property. <i>In an area with an Article 4 Direction small HMOs that require planning permission will also be counted as intensified properties.</i>	
PM108	A1: Efficient and effective use of land and buildings Paragraph 3.1.13	MIQs	Assessment criteria for HMOs	3.1.13...'Saturation is deemed to be reached if: 1. It would result in any residential property (C3 use) being 'sandwiched' between two intensified properties; or 2. Intensified properties represent more than 10% of households within a 100-metre radius of the application property.'	3.1.13...'Saturation is deemed to be reached if: 1. <i>The development</i> # would result in any residential property (C3 use) being 'sandwiched' between two intensified properties; or 2. Intensified properties, <i>including the proposed development, would</i> represent more than 10% of households <i>properties</i> within a 100-metre radius of the application property.'	To strengthen the policy in response to appeal decision.
PM108A	A1: Efficient and effective use of land and buildings	Examination	Reflect proposed changes set out at paragraph 3.1.13 (PM108) in policy text.	TBC	TBC	Examination
PM120	A1: Efficient and effective use of land and buildings	Examination	Consider referencing living conditions of occupiers/general amenity of anyone.	TBC	TBC	Examination
PM007	A2: Affordable housing	The South West HA Planning Consortium	'Occupation of affordable housing will be limited to people in need of affordable housing and shall be secured in perpetuity' in inconsistent with NPPF, only relevant to rural exception sites.		New paragraph at end of supporting text: <i>3.1.25 Given the scarcity of land in the city, the Council is committed to delivering affordable housing in perpetuity, but recognises that in certain circumstances this may not be possible. The NPPF is clear that housing should remain affordable for future eligible households. However, the NPPF also states that subsidy can be recycled for alternative affordable housing provision, and the City Council would seek the subsidy to be recycled within the city, or in areas that meet the city's housing need.</i>	The clarify the City Council's position regarding the occupation of affordable housing in perpetuity.
PM121	A2: Affordable housing	Examination	Affordable housing provision to be determined through JCS Policy SD12.	TBC	TBC	Examination

PM008 To be considered as part of the Submitted Plan.	A3: Estate Regeneration Para 3.1.28	Planning Policy Team	N/A	3.1.28 The City Council is in the process of preparing Supplementary Planning Documents for the areas of Matson and Podsmead. These SPDs provide additional guidance to support any future regeneration in these areas and should be considered as part of future planning applications.	3.1.29 The City Council <i>has produced</i> is in the process of preparing Supplementary Planning Documents for the areas of Matson and Podsmead. These SPDs provide additional guidance to support any future regeneration in these areas and should be considered as part of future planning applications.	Update regarding the status of the Supplementary Planning Documents.
PM122	A4: Student accommodation	Examination	Criterion 4 - Amend so policy relates to sustainable transport modes <u>to the educational establishment</u>	TBC	TBC	Examination
PM123	A4: Student accommodation	Examination	Criterion 1 - Broaden policy so that students don't necessarily have to be on full-time courses	TBC	TBC	Examination
PM124	A5: Specialist housing	Examination	Set out what harm the excessive concentration would result in and the principles behind it.	TBC	TBC	Examination
PM125	A5: Specialist housing	Examination	Add/amend text to clarify the need for the design of housing to meet the needs of the specialist housing client group.	TBC	TBC	Examination
PM126	A5: Specialist housing	Examination	Remove reference to 'sustainable business model' and amend supporting text to clarify what this means.	TBC	TBC	Examination
PM009	A6: Accessible and adaptable housing	Development Management	Request for "development proposals must demonstrate".	In order to create accessible homes that meets the needs of an aging population, frail and disabled persons, and to meet the City Council's duty under the Equalities Act, the following accessible and adaptable homes standards will be met:	In order to create accessible homes that meets the needs of an aging population, frail and disabled persons, and to meet the City Council's duty under the Equalities Act, <i>development proposals must demonstrate</i> the following accessible and adaptable homes standards will be met:	To add clarity.
PM010	A6: Accessible and adaptable housing Policy Text	Pall Mall Estates	The policy should be revised by adding the statement: 'unless robust evidence is submitted to justify a reduced level of provision.'	3.1.46 Compliance with the criteria should be demonstrated in the Design and Access Statement submitted with the planning application and conditions will be applied to any consent granted to ensure the standards are complied with.	3.1.47 Compliance with the criteria should be demonstrated in the Design and Access Statement submitted with the planning application and conditions will be applied to any consent granted to ensure the standards are complied with. <i>Acceptations will only be made where the applicant can clearly demonstrate that the standards cannot be met because of the nature of the development, for example where it is a conversion of an existing building into new residential dwellings.</i>	The clarify the City Council's position with regard to exceptions to the policy.
PM127	A6: Accessible and adaptable housing	Examination	Consider and make clear the exceptions to this policy.	TBC	TBC	Examination
PM128	A6: Accessible and adaptable housing	Examination	Clarify the need for specialist housing is sufficiently widely defined.	TBC	TBC	Examination
PM129	A6: Accessible and adaptable housing	Examination	Ensure references to different classifications tie in with Building Regulations so it is	TBC	TBC	Examination

			clear which category 3 is intended.			
PM130	A7: Self-build and custom build homes	Examination	Clarify sites of 20 houses. Clarify 5% of houses, not deliverable area. Delete 'minimum' 5%.	TBC	TBC	Examination
PM131	A7: Self-build and custom build homes	Examination	Consider and clarify appropriate length of marketing.	TBC	TBC	Examination
PM011	A10: Annexes to existing dwellings Para 3.1.54	Development Management	Request to cross reference policies to provide clarity.	3.1.54 ...The annex should form part of the same "planning unit" by sharing the same access, parking area and garden.	3.1.55 ... The annex should form part of the same "planning unit" by sharing the same access, parking area and garden. <i>Applications for annexes must also comply with Policy A9: Extensions to existing dwellings.</i>	To provide clarity.

B: EMPLOYMENT DEVELOPMENT, CULTURE AND TOURISM

REF	Plan Reference	Respondents / Stage	Summary	Presubmission Text	Modification	Reason
PM012	B1: Employment and skills plans	Home Builders Federation	Support policy with some changes to support its effectiveness – refer to the need for the ESP to be prepared with reference to latest CITB Skills Audit prepared for LEP to provide baseline evidence for practical interventions. Add reference to City Council working with LEP to create a forum for house builders operating across the LEP area.	For housing development of 10 or more units, applicants will be required to submit an Employment and Skills Plan (ESP). The ESP will be proportionate to the scale of the proposal and identify opportunities for the employment and skills development of local people through the implementation of the proposal. The ESP should address priorities identified and agreed at an early stage through consultation with the City Council and local employment & skills agencies. The ESP will have targets reflecting industry standard benchmarks, setting out the outcomes expected from the development. New paragraph at paragraph 3.2.11.	For housing development of 10 or more units, applicants will be required to submit an Employment and Skills Plan (ESP). The ESP will be proportionate to the scale of the proposal and identify opportunities for the employment and skills development of local people through the implementation of the proposal. The ESP should address <i>priorities identified by relevant local industry groups, such as the Construction Industry Training Board (CITB)</i> and agreed at an early stage through consultation with the City Council and local employment & skills agencies. The ESP will have targets reflecting industry standard benchmarks, setting out the outcomes expected from the development. <i>3.2.11 The City Council will keep the effectiveness of the policy under review through regular dialogue with housebuilders and through liaison with the Gloucestershire Employment and Skills Board, which includes industry representatives alongside learning and skills providers.</i>	To make the policy more effective.
PM013	B2: Safeguarding employment sites and buildings Supporting text 3.2.16	Minerals and Waste	Policy fails to incorporate the strategically significant matter of supporting the local network of sustainable waste management infrastructure / facilities through safeguarding. Suggested amendment.	3.2.16....It applies to all existing employment land and premises, consented employment land and premises, and allocations made in the GCP.	3.2.17....It applies to all existing employment land and premises, consented employment land and premises, and allocations made in the GCP. <i>Waste management infrastructure and facilities may be considered in the same way as B-class employment development for the purposes of Policy B2.</i>	Added to safeguard waste management facilities on the advice of the County Council as Minerals & Waste Planning Authority.
PM109	B2: Safeguarding employment sites and buildings	MIQs	Implications of new Use Classes Order.		Amend policy to refer to Use Classes B2, B8 and E(g). To be confirmed.	Proposed amendment to address September 2020 update to Use Classes Order
PM109A	B2: Safeguarding employment sites and buildings	Examination	Amend policy in light of new Use Classes Order (replaces suggestion at PM109).	TBC	TBC	Examination

PM014	B3: New employment development and intensification and improvements to existing employment land Policy text Criterion 3 & new criterion 6.	Minerals and Waste	The policy fails to incorporate the strategically significant matters of implementing waste minimisation and safeguarding the network of sustainable waste management infrastructure / facilities.	3. The proposal would not result in significant adverse impact on the amenity of neighbouring uses, particularly residential properties; and... Additional criterion after number 5. Additional paragraph in supporting text.	3. The proposal would not result in significant adverse impact on the amenity of neighbouring uses, particularly residential properties and <i>it would not place unreasonable operational restrictions on adjacent existing or allocated land uses.</i> <i>'6. Provision is made for the delivery of efficient and effective commercial waste collection services.'</i> <i>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.</i>	Added to promote waste minimisation and waste safeguarding on the advice of the County Council as Minerals & Waste Planning Authority.
PM015	B3: New employment development and intensification and improvements to existing employment land Policy text Point 5	Gloucestershire Wildlife Trust	Should be explicit under point 5 that unacceptable adverse environmental impacts should include those on ecological networks and biodiversity, where they cannot be appropriately mitigated or offset.	5. It would not result in unacceptable adverse environmental impacts, for example in terms of noise, air, water, soil or light pollution.	5. It would not result in unacceptable adverse environmental impacts, for example <i>on the ecological network, biodiversity, or in terms of noise, air, water, soil or light pollution.</i>	Added as it is another form of environmental impact and its exclusion could imply it isn't relevant.
PM110	B3: New employment development and intensification and improvements to existing employment land	MIQs	Implications of new Use Classes Order.		Amend policy to refer to Use Classes B2, B8 and E(g). To be confirmed.	Proposed amendment to address September 2020 update to Use Classes Order
PM110A	B3: New employment development and intensification and improvements to existing employment land	Examination	Amend policy in light of new Use Classes Order (replaces suggestion at PM110).	TBC	TBC	Examination
PM173	B3: New employment development and intensification and improvements to existing employment land	Examination	Remove 'for example' from policy wording.	TBC	TBC	Examination
PM016 (Please note this has been replaced by PM016A below)	B4: Development within and adjacent to Gloucester Docks and Canal	Historic England	Suggest inclusion of a reference for proposals to take account of desirability of sustaining/enhancing historic significance.	2. The development would not adversely affect, and where possible enhances the historic built character, features and setting of the open waterspaces; and	2. The development would not adversely affect, and where possible enhances the historic built character <i>significance</i>, features and setting of the open waterspaces; and	To better reflect NPPF terminology.
PM016A	B4: Development within and adjacent	Historic England	Suggest inclusion of a reference for proposals to take	2. The development would not adversely affect, and where possible enhances the historic built	<i>'Development will be expected to respond to the significance of the historic docks conservation area</i>	Following discussions with Historic England in preparing the Statement of Common Ground, this

	to Gloucester Docks and Canal		account of desirability of sustaining/enhancing historic significance.	character, features and setting of the open waterspaces; and	<i>and other individual heritage assets, ensuring new development makes a positive contribution to its character and distinctiveness.'</i>	replaces the proposed change set out at PM016. It is considered to better address the soundness objections raised by Historic England in responding to the Pre-Submission GCP.
PM017	B4: Development within and adjacent to Gloucester Docks and Canal	Canal and River Trust	Reference need to safeguard existing waterside in policy and uses do not impede the use of waterspaces by boats, craft and vessels.	<p>3.2.21 Gloucester Docks and the canal side is a major cultural and historic asset for the city, and already represents a major tourist attraction with the National Waterways Museum, Soldiers of Gloucestershire Museum and various festivals and events. However, the waterspace is generally underutilized and represent an opportunity to attract further investment, generate footfall within the city centre and encourage physical activity and improved health and wellbeing. The Canal and River Trust has prepared a Waterspace Strategy for Gloucester Docks, which aims to increase the recreational use of the Docks and canal.</p> <p>3.2.22 The whole of the Docks and part of the Gloucester & Sharpness canal is located within conservation areas, and within the main Docks basin, there are 14 Listed warehouses. Furthermore, the city's successful regeneration programme over recent years has resulted in the creation of a new residential and business community within the docks and wider area. It is important that increased use of the waterspaces does not lead to a significant adverse impact on local amenity or lead to an erosion of the special historic character within the area.</p>	<p>New bullet point between current bullets 4 and 5:</p> <p>5. The development would not adversely affect the functioning of existing businesses; and</p> <p>New supporting text:</p> <p>3.2.23 Gloucester Docks and the canal side is a major cultural and historic asset for the city, and already represents a major tourist attraction with the National Waterways Museum, Soldiers of Gloucestershire Museum and various festivals and events. <i>The docks are also home to both commercial and leisure moorings as well as other commercial uses, including a successful working boatyard which add heritage value and visual interest to both the dockside and waterspace.</i></p> <p>3.2.24 However, the waterspace is generally underutilized and represent an opportunity to attract further investment, generate footfall within the city centre and encourage physical activity and improved health and wellbeing. The Canal & River Trust has prepared a Waterspace Strategy for Gloucester Docks, which aims to increase the recreational use of the Docks and canal <i>whilst retaining and supporting existing uses.</i></p>	To safeguard existing waterside uses.
PM018	B4: Development within and adjacent to Gloucester Docks and Canal	Gloucestershire County Council - Ecology	Wording of Part 5 is unclear regarding infrastructure and biodiversity net gain – suggest amendment to strengthen. Note requirement for HRA – helpful but not essential given Policy E2.	5. Development provides net biodiversity gain and facilitate its role as multifunctional green and blue infrastructure (including water quality).	6. Development provides net biodiversity gain and facilitates its role as delivery of multifunctional green and blue infrastructure (including water quality).	To improve phrasing.
PM174	B6: Protection of public houses	Examination	Consider whether 'opportunities have been explored' is appropriate. Bring criteria in supporting text into policy wording.	TBC	TBC	Examination

C: HEALTHY COMMUNITIES

REF	Plan Reference	Respondents / Stage	Summary	Presubmission Text	Modification	Reason
PM019 To be considered as part of the Submitted Plan.	General comment	Historic England	Modification – reflect the role heritage can have in promoting good health and wellbeing.	3.3.6 The following policies have been included to ensure new development does not harm human health and takes all available opportunities to provide our residents with healthy active choices.	3.3.6 The following policies have been included to ensure new development does not harm human health and takes all available opportunities to provide our residents with healthy active choices. <i>More widely, the GCP supports the creation of healthier communities. This is reflected in many other policies, for example those relating to heritage, good design</i>	To clearly state the importance of healthy communities through the GCP, including heritage.

					<i>and creating a sense of place in new development, the delivery of new homes that meet the needs of communities and sustainable transport.</i>	
PM020	C1: Active design and accessibility	Gloucestershire Wildlife Trust	Recommend quality of green space also referenced as a key factor in levels of use which can deliver multiple benefits for ecological and environmental enhancement.	3.3.9 Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing.	3.3.9 Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, good quality green spaces and green routes, safe places for active play, and spaces for food growing.	To strengthen the supporting text regarding the quality of green spaces and green routes.
PM021 To be considered as part of the Submitted Plan.	C1: Active design and accessibility Para 3.3.10 Page 39	Gloucestershire Highways	County highways should be highways authority. Ensure correct reference to Gloucestershire County Council's Manual for Streets.	3.3.10 Cycle parking, cycle storage, accessibility and walking distances shall meet the guidance provided in Manual for Gloucestershire Streets 4th Edition and any subsequent amendments from County Highways.	3.3.10 Cycle parking, cycle storage, accessibility and walking distances shall meet the guidance provided in Manual for Gloucestershire Streets 4th Edition and any subsequent amendments from County Highways the Highways Authority .	To correct name of organisation.
PM022	C1: Active design and accessibility	Development Management	add the word 'use' to access and feel safe	3.3.11 ...People of all ages, genders, ethnicity, economic circumstance, those with both physical and learning disabilities in our community should be able to access and feel safe in all new developments. This includes extensions to all public buildings and the design and layout of public open spaces and playgrounds.	3.3.11 ...People of all ages, genders, ethnicity, economic circumstance, those with both physical and learning disabilities in our community should be able to access, use and feel safe in all new developments. This includes extensions to all public buildings and the design and layout of public open spaces and playgrounds.	To clarify that everyone should be able to use the development as well as access it.
PM132	C1: Active design and accessibility	Examination	Remove reference to Active Design in policy and move to supporting text.	TBC	TBC	Examination
PM023	C3: Public open space, playing fields and sports facilities.	Gloucestershire Playing Fields Association	Remove reference to 'excess provision' and clarify the different approaches to open spaces, playing fields and built sports facilities.	Existing public open spaces, playing fields and built sports facilities will be protected from redevelopment to alternative uses, in whole or in part, unless it can be demonstrated that: 1. There is an excess of provision in the local area, there is no current or planned future demand for such provision and that there would be no overall shortfall; or 2. The open space, playing field or facility can be replaced by alternative provision of an equivalent or better quality and quantity in an accessible and appropriate location to the community where the loss would occur; or 3. The proposal is ancillary development that would enhance existing facilities and not reduce or prejudice its ongoing use; or 4. The proposal affects land that is not suitable, or incapable, of forming an effective part of the open space, playing field or facility and its loss would not prejudice the ongoing use of the remainder of the site for that purpose.	Existing public open spaces, playing fields and built sports facilities will be protected from redevelopment to alternative uses, in whole or in part, unless it can be demonstrated that the following criteria are met: 1. For public open spaces, the applicant has undertaken an assessment that shows the site is of low value and of poor quality, with no opportunities for improvement and is surplus in terms of all functions that open space can provide. 2. For playing fields and sports facilities, the applicant has undertaken an assessment that shows there is an excess of provision in the local area, there is no current or planned future demand for such provision, or that there would be no overall shortfall in provision. If the criteria above cannot be met: 3. The open space, playing field or facility can be replaced by alternative provision of an equivalent or better quality and quantity in an accessible and appropriate location to the community where the loss would occur; or 4. The proposal is ancillary development that would enhance existing facilities and not reduce or prejudice its ongoing use; or	To clarify the different approaches towards open spaces and playing fields/built sports facilities.

					<p>5. The proposal affects land that is not suitable, or is incapable, of forming an effective part of the an open space, playing field or facility and its loss would not prejudice the ongoing use of the remainder of the site for that purpose.</p> <p>The need for new open space and playing fields within new development will be determined in accordance with the aims and recommendations of the City Council's Open Space Strategy and Playing Pitch Strategy.</p> <p>Development proposals to enhance or provide new open spaces, playing fields or built sports facilities will be supported where they deliver the aims and recommendations of the Council's Open Space Strategy, Playing Pitch Strategy and Built Sports Facilities Strategy, or any future iterations.</p>	
PM024	C3: Public open space, playing fields and sports facilities Paragraph 3.3.16	Cabinet Member for Strategic Housing and Planning	Ensure Member engagement where a proposal would result in the loss of an open space, in a similar fashion to Policy INF4 of the JCS.	<p>3.3.16 Policy INF4 of the Joint Core Strategy sets out that where new residential development will create, or add to, a need for community facilities, including open space, it should be met as on-site provision and/or as a contribution to facilities or services off-site. In satisfying this requirement, applicants should have regard to the aims and recommendations of the strategies identified in the paragraph above. Normally, new on-site open space will be expected on sites of 35 homes or greater.</p> <p>3.3.17 To achieve this, the site allocations within this plan identify specific opportunities for new provision where there is a shortfall in quantity, quality and accessibility, namely;</p> <ul style="list-style-type: none"> • Land rear of St Oswalds Retail Park; • Land at Great Western Road Sidings; and • Land at The Wheatridge (should it come forward for residential development) <p>3.3.18 Furthermore, site allocation SA06 allocates land at 'Blackbridge' in Podsmead for a sports and community hub. This forms a key part of the Council's Playing Pitch Strategy, which seeks the delivery of two multi-functional sports hubs in Gloucester; one in the north and one in the south of the city. The northern hub, located</p>	<p>3.3.16 Policy INF4 of the Joint Core Strategy requires that proposals to develop land or buildings, currently or previously in use as a community facility will demonstrate, including evidence of engagement with relevant local community groups and partner organisations, why the facility is no longer required and, as appropriate, how, when and where suitable local replacement facilities will be provided. This should also include elected Councillors. Where new development affects land currently or previously used as a playing field (within the last five years), Sport England will be consulted as statutory consultee and the applicant will be required to demonstrate compliance with their exception tests.</p> <p>3.3.17 Policy INF4 of the Joint Core Strategy further sets out that where new residential development will create, or add to, a need for community facilities, including open space, it should be met as on-site provision and/or as a contribution to facilities or services off-site. In satisfying this requirement, applicants should have regard to the aims and recommendations of the strategies identified in the paragraph above. Normally, new on-site open space will be expected on sites of 35 homes or greater.</p> <p>3.3.18 To achieve this, the site allocations within this plan identify specific opportunities for new provision where there is a shortfall in quantity, quality and accessibility, namely;</p> <ul style="list-style-type: none"> • Land rear of St Oswalds Retail Park; • Land at Great Western Road Sidings; and 	To ensure Member engagement where a proposal would lead to the loss of an open space.

				<p>at Oxstalls Sports Park and the University of Gloucestershire, was complete in 2018.</p> <p>3.3.19 The location and extent of open spaces and playing fields is identified on the policies map. Where new development delivers additional open spaces and playing fields that aren't shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these include sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.</p> <p>3.3.20 Where new development affects land currently or previously used as a playing field (within the last five years), Sport England will be consulted as statutory consultee and the applicant will be required to demonstrate compliance with their exception tests.</p>	<ul style="list-style-type: none"> Land at The Wheatridge (should it come forward for residential development) <p>3.3.19 Furthermore, site allocation SA06 allocates land at 'Blackbridge' in Podsmead for a sports and community hub. This forms a key part of the Council's Playing Pitch Strategy, which seeks the delivery of two multi-functional sports hubs in Gloucester; one in the north and one in the south of the city. The northern hub, located at Oxstalls Sports Park and the University of Gloucestershire, was complete in 2018.</p> <p>3.3.20 The location and extent of open spaces and playing fields is identified on the policies map. Where new development delivers additional open spaces and playing fields that aren't shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these include sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.</p> <p>3.3.20 Where new development affects land currently or previously used as a playing field (within the last five years), Sport England will be consulted as statutory consultee and the applicant will be required to demonstrate compliance with their exception tests.</p>	
PM024A	C3: Public open space, playing fields and sports facilities	Examination	Remove reference to member engagement at PM024.	TBC	TBC	Examination
PM111	C3: Public open space, playing fields and sports facilities	MIQs	Playing Pitch Strategy	The need for new open space and playing fields within new development...	<i>New open space, playing fields and facilities, to be delivered through new development...</i>	For the avoidance of doubt and to improve the effectiveness of the policy.
PM133	C3: Public open space, playing fields and sports facilities	Examination	Remove reference to Open Space Strategy, Playing Pitch Strategy and Built Facilities Strategy and move to supporting text.	TBC	TBC	Examination
PM025	C4: Hot food takeaways Policy text point 3	Gloucestershire County Council – Highways Development Management	Policy requires - There would not be a severe impact on the surrounding highway network, traffic safety or create unacceptable parking issues – the wording of this sentence needs to avoid mixing NPPF wording and the actual worded intent of the NPPF	3. There would not be a severe impact on the surrounding highway network, traffic safety or create unacceptable parking issues; and	3. There would not be an unacceptable severe impact on the surrounding highway network, traffic safety or create unacceptable parking issues; and	To reflect wording in NPPF

			(safety is acceptable/unacceptable – capacity is severe).			
PM026 To be considered as part of the Submitted Plan.	C4: Hot food takeaway	GCC Minerals and Waste	Welcome requirement for adequate provision for waste and disposal facilities but would benefit from being more prescriptive and better aligned local policy ambitions for the future management of waste. Suggested amendment provided.	New paragraph in supporting text.	<i>3.3.25 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.</i>	Added to promote effective waste management at Hot food premises on the advice of the County Council as Minerals & Waste Planning Authority.
PM027 To be considered as part of the Submitted Plan.	C4: Hot food Takeaways Page 42 Para 3.3.22	Gloucestershire County Council – Public Health	Strong support for policy - but suggest amendment to paragraph 3.3.22 to update obesity figures for children with latest data set out in the response.	3.3.22 Gloucester has several health issues connected with obesity that need to be addressed. Public Health England (PHE) reports that in 2017/18 66.3% of adults and 36.8% of children in Year 6 were overweight. Reducing obesity, particularly among children, is one of the priorities of (PHE and the government’s ‘Childhood Obesity Plan’). Being overweight increases a person’s risk of developing cancer, heart disease and type 2 diabetes.	3.3.22 Gloucester has several health issues connected with obesity that need to be addressed. Public Health England (PHE) reports that in 2017/18 66.3% of adults and 36.8% of children in Year 6 were overweight. <i>2018/19 25.9% of 4-5 year olds and 36.9% of 10-11 year olds in Gloucester City are an excess weight (overweight or obese). These figures are significantly higher than national and county averages. Furthermore, 5.4% of 10-11 year olds are affected by severe obesity and this level is one of the highest in the South West region.</i> Reducing obesity, particularly among children, is one of the priorities of (PHE and the government’s ‘Childhood Obesity Plan’). Being overweight increases a person’s risk of developing cancer, heart disease and type 2 diabetes.	To reflect suggestion by Public Health to prioritise children’s obesity data and reflect latest data.
PM028	C4: Hot food takeaway Page 41	Development Management	Where to measure from?	Outside of the city centre, district centres and local centres, that the proposal is not within 400 metres of a secondary school or college.	Outside of the city centre, district centres and local centres, that the proposal is not within 400 metres of <i>the boundary of</i> a secondary school or college.	To add clarity.
PM029	C4: Hot food takeaway Page 42 Para 3.3.23	Development Management	Where to measure from?	3.3.23 To help tackle childhood obesity through supporting healthy behaviours, hot food takeaways will not be permitted within 400 metres of a secondary schools or colleges.	3.3.23 To help tackle childhood obesity through supporting healthy behaviours, hot food takeaways will not be permitted within 400 metres of <i>the boundary of</i> a secondary schools or colleges.	To add clarity.
PM112	C4: Hot food takeaways	MIQs	Implications of new Use Classes Order.	Criterion 5 requires ‘There should be a minimum of two non-A5 units, or at least 10 metres, between the units, whichever is greater.’	Amend policy to refer to ‘hot food takeaway units’, removing reference to A5 Use Class.	To address September 2020 update to Use Classes Order
PM134	C4: Hot food takeaways	Examination	Ensure policy only refers to things subject to planning control.	TBC	TBC	Examination
PM135	C4: Hot food takeaways	Examination	Remove reference to ‘reasonable distance’ in criterion 2.	TBC	TBC	Examination
PM136	C4: Hot food takeaways	Examination	Consider 400m from boundary in criterion 6, perhaps better related to access points.	TBC	TBC	Examination
PM030	C5: Air quality	Gloucestershire County Council - Ecology	Policy should reference need for HRA in certain circumstances to be consistent in approach with Policy B4.	New paragraph at end of policy.	Where development could have an impact on internationally designated sites a Habitats Regulations Assessment is required.	Natural England

PM030A	C5: Air Quality	Examination	Move PM030 from policy to supporting text.	TBC	TBC	Examination.
PM031	C5: Air quality	The Woodland Trust	Support policy. Suggested wording to strengthen support text re. mitigating impact of trees.	3.3.28 There is evidence that increased urban vegetation can help to reduce the impacts of air pollution, but a distinction should be made between reductions in concentrations of particulate matter and gaseous pollutants.	3.3.29 There is evidence that increased urban vegetation can help to reduce the impacts of air pollution. but <i>The importance of trees/vegetation as a physical barrier between sources of pollution and those at risk should be emphasised.</i> A distinction should be made between reductions in concentrations of particulate matter and gaseous pollutants.	To clarify and ensure that the issue of trees and other vegetation as physical barriers is included.
PM032	C6: Cordon sanitaire Page x Supporting text New paragraph	GCC Minerals & Waste	Netheridge is an essential item of public infrastructure. Policy should be expanded to go beyond smell and should cover all potential land-use incompatibility issues and better accommodate future requirements of the works. Suggested amendment provided.	New paragraph in supporting text after 3.3.33.	<i>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.</i>	Clarification needed so as to cover land-use incompatibility issue and better accommodate the future requirements of Netheridge Sewage Treatment Works, which could change from those referred to under paragraph 3.3.32 of the policy supporting text.
PM137	C6: Cordon sanitaire	Examination	Add supporting text explaining how the Cordon Sanitaire policy is intended to work and consider if the policy could be made more positive/flexible.	TBC	TBC	Examination
PM033	C7: Fall prevention from taller buildings Page 45 Para 3.3.36	Gloucestershire County Council – Public Health	Public Health team and Gloucestershire Suicide Prevention Partnership strongly support policy - justified as an evidence-based intervention that can prevent death and serious injury. Policy could be strengthened by ensuring mitigation measures are also planned for the construction phase, e.g. to address risks posed by tall scaffolding.	3.3.36...Where public access to an open roof top or element is possible, over 12 metres, suitable well-designed suicide prevention measures will be required to be incorporated into the design of the building. These will be subtle and cohesive to the architectural design.	3.3.36 ...Where public access to an open roof top or element is possible, over 12 metres, suitable well-designed suicide prevention measures will be required to be incorporated into the design of the building. These will be subtle and cohesive to the architectural design. <i>The statement should also include planned mitigation measures that will be taken during the construction phase to prevent access to, and falls from, scaffolding.</i>	Proposed change from Public Health.
PM113	C8: Changing Places	MIQs	MIQs	Policy C8: Changing Places Toilets Where appropriate, major applications for retail, sports venues, cultural and leisure developments that propose to provide toilets will provide at least one toilet to the 'Changing Places' standard.	Policy C8: Changing Places Toilets Where appropriate, major applications for retail, sports venues, cultural and leisure developments that propose to provide toilets will provide at least one toilet to the 'Changing Places' standard. <i>Major non-residential developments and minor developments for community, cultural, leisure, sport and civic uses where a new or refurbished public toilet or changing facility is proposed, shall include a toilet constructed to the 'Changing Places' standard.</i>	Further clarity in response to Matters Statement 5 question 52
PM138	C8: Changing Places	Examination	Consider the use of the word 'will' – perhaps include 'where possible'.	TBC	TBC	Examination
PM139	C8: Changing Places	Examination	Put reference to Changing Places Standard in supporting text.	TBC	TBC	Examination

D: HISTORIC ENVIRONMENT

REF	Plan Reference	Respondents / Stage	Summary	Presubmission Text	Modification	Reason
PM034 To be considered as part of the Submitted Plan.	D - Historic environment	Historic England	Suggested minor wording changes regarding weight to heritage assets and terminology (linking to NPPF). Suggest better referencing of the recently adopted Heritage Strategy and the Council's recent success in achieving the County's flagship High Street Heritage Action Zone – the Cathedral Quarter.	<p>3.4.3 The City Council has recently adopted a new Heritage Strategy (HS) for the city. It sets out that Gloucester's historic environment, is a powerful resource for economic development, regeneration, supporting business and enterprise, competitiveness, tourism, and attracting people to live, work, visit and invest. It also provides volunteer opportunities and helps foster local identify and pride.</p> <p>3.4.4 The overall aim of the HS is 'To achieve effective and sustainable conservation, regeneration and management of Gloucester's heritage, so as to fully realise its economic, community and cultural potential.' It sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.</p> <p>3.4.5 The JCS and GCP have a strong role in delivering the aims and objectives of the HS. The policies that follow in this section quite obviously have a direct link in that they seek to conserve and enhance the historic environment. However, the HS is a golden thread that has informed and will be delivered by different policies, including for example Policy A1, which supports the reuse of vacant floors above commercial units to support the reuse of historic buildings and repopulation of the city centre. There are also important implications for some of the site allocations, particularly SA08 King's Quarter, SA10 Former Fleece Hotel & Longsmith Street Car Park and SA21 Park of West Quay, The Docks.</p>	<p><i>Gloucester Heritage Strategy</i></p> <p>3.4.3 The City Council has recently adopted a new Heritage Strategy (HS) for the city. It sets out that Gloucester's historic environment, is a powerful resource for economic development, regeneration, supporting business and enterprise, competitiveness, tourism, and attracting people to live, work, visit and invest. It also provides volunteer opportunities and helps foster local identify and pride.</p> <p>3.4.4 The overall aim of the HS is 'To achieve effective and sustainable conservation, regeneration and management of Gloucester's heritage, so as to fully realise its economic, community and cultural potential.' It sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.</p> <p><i>3.4.5 The HS was delivered through the Great Place scheme, funded by the Heritage Fund and Arts Council England. The Great Place scheme places a strategic focus on enhancing Gloucester's heritage for all and embeds a culture of developing an holistic approach to the regeneration of the city centre through the development of a heritage strategy which will in turn aid proactive working with developers, members, stakeholders and partners, whether professional or residents of the City over the next ten years and beyond.</i></p> <p><i>3.4.6 Heritage is a key component in the effective delivery of sustainable growth. It contributes to the creation of a competitive City Centre, support for the diverse needs of local communities, and the creation and maintenance of a high quality and sustainable environment. The historic environment is an integral part of the wider regeneration, economic development, tourism and cultural aspirations of the City of Gloucester.</i></p> <p><i>3.4.7 A background document has been created which informs the Gloucester Heritage Strategy 2019-29 titled "Gloucester Heritage Strategy Background Document - Evidence, Analysis, Engagement". It comprises an evidence base and summary of stakeholder engagement and provides the foundation on which the strategy has been formulated. In addition to being the evidence base for the heritage strategy, it provides evidence for the Gloucester City Local Plan and includes evidence and analysis of Gloucester's heritage resources, including the nature of the resource, economic value and key issues. Analysis of</i></p>	To better communicate the importance and purpose of the adopted Gloucester Heritage Strategy and High Street Heritage Action Zone (Cathedral Quarter).

					<p><i>key projects and development involving or affecting Gloucester's heritage, with a particular focus on design quality and economic impact. An overview of other local plans and strategies relevant to heritage. A summary of the outcomes of stakeholder and community engagement. Details of local stakeholders from across the sectors and a section on possible funding sources.</i></p> <p><i>3.4.8 The Heritage Strategy has been written as a collaboration between local and national heritage organisations, including the City Council, Gloucester Civic Trust, Gloucester Historic Buildings Trust, Gloucester Heritage Forum and Historic England. The delivery of the key actions will require collaboration and close working between those partners to draw upon each other's strengths and to attract the necessary resources to maximise the 10-year vision the strategy puts forward.</i></p> <p><i>High Street Heritage Action Zone – Cathedral Quarter</i></p> <p><i>3.4.9 The City Council has also been successful in achieving High Street Heritage Action Zone (HSHAZ) status for the Cathedral Quarter, located around Westgate Street. Westgate is one of the oldest and best-preserved areas of Gloucester and the main commercial route linking the cathedral to the rest of the city. One of four original Roman routes, Westgate links the spectacular medieval cathedral to the rest of the city. Its array of stunning historic buildings includes the 15th century timber-framed Fleece Inn and Antiques centre, both of which are on Historic England's Heritage at Risk register. Despite its strong historic character, proximity to the cathedral and good location, Westgate Street is underperforming. Westgate's retail environment has changed dramatically in recent years. It once had a strong mix of independent businesses whose owners embraced the street's historic buildings, but many have moved on and prospective new owners feel the properties are expensive to run and difficult to convert. The street scene is tired, with poor paving, inconsistent signage, and general clutter. Many retail units stand vacant. Locals perceive the area in a negative light and of the thousands of visitors to the cathedral, few are attracted into Westgate Street.</i></p> <p><i>3.4.10 The Heritage Action Zone will capitalise on Westgate's untapped potential and boost the number of people living, working and taking pride in the area. The award of up to £1.9m to Gloucester City Council will invest in Westgate Street's beautiful historic buildings, repairing buildings and historic shopfronts and converting vacant upper floors for new uses. There will be advice and support for businesses in historic properties, and the streetscape will be improved with</i></p>	
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					<p><i>new signage and branding. The area will be vibrant with cultural activities, from community archaeology to performing arts, and will become known for its attractive evening and night-time offer. The Heritage Action Zone will help Westgate thrive again by bringing a modern business approach to an outstanding historic environment.</i></p> <p>3.4.11 The JCS and GCP have a strong role in delivering the aims and objectives of the HS <i>and Cathedral Quarter HZAZ</i>. The policies that follow in this section quite obviously have a direct link in that they seek to conserve and enhance the historic environment. However, the HS is a golden thread that has informed and will be delivered by different policies, including for example Policy A1, which supports the reuse of vacant floors above commercial units to support the reuse of historic buildings and repopulation of the city centre. There are also important implications for some of the site allocations, particularly SA08 King’s Quarter, SA10 Former Fleece Hotel & Longsmith Street Car Park and SA21 Park of West Quay, The Docks.</p>	
PM035 To be considered as part of the Submitted Plan.	D - Historic environment	Historic England	Suggest better referencing the Townscape Character Study evidence document and Public Realm Strategy.		<p>New paragraphs</p> <p><i>3.4.13 A Townscape Character Assessment (TCA) has been undertaken for every part of the City. The TCA identifies the morphology of Gloucester identifying form and origins, building types, past and present uses, trees and greenspaces, grain, density and plot coverage, and architectural qualities including periods, detailing and materials and colour palettes for each character area. The TCA can be used to inform an understanding of character and local distinctiveness.</i></p> <p><i>3.4.14 The Public Realm Strategy SPD provides further guidance relating to the high-quality design of streets, squares, parks, green spaces and other outdoor spaces required in the historic core of the City.</i></p>	To better reference the Townscape Character Study evidence document and Public Realm Strategy.
PM036 (Please note this has been replaced by PM036A below)	D1: Historic Environment	Historic England	<p>Suggest amendment to Policy D1 criterion 3 to refer to ‘sustain’ rather than ‘preservation’ to reflect NPPF terminology.</p> <p>Suggest additional wording under criterion 6 of policy to justification for harm to designated heritage assets.</p>	<p>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:</p> <ol style="list-style-type: none"> 1. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and 2. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and 3. The proposed use of the heritage asset is compatible with preservation or enhancement of its significance; and 	<p>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:</p> <ol style="list-style-type: none"> 7. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and 8. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and 9. The proposed use of the heritage asset is compatible with the preservation <i>sustaining</i> or enhancement <i>ingment</i> of its significance; and 10. The proposal conserves and enhances the character, appearance and architectural 	To better reflect NPPF terminology and Historic England’s request for clarity regarding justification for harm to designated heritage assets.

				<p>4. The proposal conserves and enhances the character, appearance and architectural quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and</p> <p>5. The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and</p> <p>6. Retains important views into or out of the Conservation Area.</p>	<p>quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and</p> <p>11. The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and</p> <p>12. Retains important views into or out of the Conservation Area.</p> <p><i>Great weight will be applied to the conservation of designated heritage assets and any harm will require a clear and convincing justification.</i></p>	
PM036A	D1: Historic Environment	Historic England	<p>Suggest amendment to Policy D1 criterion 3 to refer to 'sustain' rather than 'preservation' to reflect NPPF terminology.</p> <p>Suggest additional wording under criterion 6 of policy to justify harm to designated heritage assets.</p>	<p>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:</p> <p>1. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and</p> <p>2. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and</p> <p>3. The proposed use of the heritage asset is compatible with preservation or enhancement of its significance; and</p> <p>4. The proposal conserves and enhances the character, appearance and architectural quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and</p> <p>5. The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and</p> <p>6. Retains important views into or out of the Conservation Area.</p>	<p>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings. Proposals should demonstrate:</p> <p>1. The protection and enhancement of existing heritage assets and their settings in proportion with the significance of the asset; and</p> <p>2. The conservation of features that contribute to the significance of a heritage asset, including structures forming part of the curtilage; and</p> <p>3. The proposed use of the heritage asset is compatible with the preservation <i>sustaining</i> or enhancement <i>ingment</i> of its significance; and</p> <p>4. The proposal conserves and enhances the character, appearance and architectural quality of the area and wider setting in terms of siting, scale, form, proportion, design and materials; and</p> <p>5. The use of high quality and locally distinctive materials following traditional building methods and detailing, where appropriate; and</p> <p>6. Retains important views into or out of the Conservation Area.</p> <p><i>Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification.</i></p>	<p>Following discussions with Historic England in preparing the Statement of Common Ground, this replaces the proposed change set out at PM036. It is considered to better address the soundness objections raised by Historic England in responding to the Pre-Submission GCP.</p>
PM037 (Please note this has been replaced by PM037A below)	D2: Non-designated heritage assets	Historic England	Clumsy wording at opening line of Policy D2.	Where development affects a non-designated heritage asset, it is necessary to satisfy the following criteria. Development proposals should:	Where development affects a non-designated heritage asset, it is necessary to satisfy the following criteria. Development proposals should:	To provide a better form of words.

PM037A	D2: Non-designated heritage assets	Historic England	Clumsy wording at opening line of Policy D2.	Where development affects a non-designated heritage asset, it is necessary to satisfy the following criteria. Development proposals should:	<i>Development affecting a non-designated heritage asset, or its setting should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered. Development proposals should:</i>	Following discussions with Historic England in preparing the Statement of Common Ground, this replaces the proposed change set out at PM037. It is considered to better address the concerns raised by Historic England in responding to the Pre-Submission GCP.
PM038 To be considered as part of the Submitted Plan.	D2: Non-designated heritage assets	Historic England	Suggested wording changes to rationalise text and provide greater consistency. Encourage the City Council to include a commitment to preparing a Local List.	3.4.15 Gloucester City Council does not have a formal Local List of non-designated heritage assets, but the Council have developed criteria for the identification of undesignated heritage assets which may be suitable for inclusion on a future local list and this is available from the City Council website. These criteria have been developed following Historic England Guidance 'Local Heritage Listing: Historic England Advice Note 7', which is available to download from the Historic England website. 3.4.16 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future Local List.	3.4.23 Gloucester City Council does not have a formal <i>is in the process of creating a</i> Local List of non-designated heritage assets, <i>using a criteria for the</i> but the Council have developed criteria for the identification of undesignated heritage assets. which may be suitable for inclusion on a future local list and this is available from the City Council website. These criteria have been developed following Historic England Guidance 'Local Heritage Listing: Historic England Advice Note 7', which is available to download from the Historic England website. 3.4.24 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future <i>the</i> Local List.	To express the City Council's commitments to the preparation of a Local List.
PM039	D4: Shops, shutters and signs	Development Management	Signage in heritage chapter so only applies to heritage – Need to clarify applies to all signage	3.4.20 The Shopfront, Shutters and Signage policy will ensure that schemes are well considered and make a positive contribution to the streetscene and wider urban environment.	3.4.28 The Shopfront, Shutters and Signage policy <i>applies across the city in all settings and</i> will ensure that schemes are well considered and make a positive contribution to the streetscene and wider urban environment.	To clarify that the policy does not just apply to shopfronts, shutters and signage in the historic environment. Correct spelling.
PM140	D5: Shopfronts, shutters and signs	Examination	Reword – remove the words 'presumption in favour'.	TBC	TBC	Examination
PM141	D5: Shopfronts, shutters and signs	Examination	Consider how policy could be more flexible / less prescriptive.	TBC	TBC	Examination
PM142	D5: Shopfronts, shutters and signs	Examination	Move reference to SPD from policy to supporting text.	TBC	TBC	Examination

E: NATURAL ENVIRONMENT

REF	Plan Reference	Respondents / Stage	Summary	Presubmission Text	Modification	Reason
PM040 To be considered as part of the Submitted Plan.	Natural Environment Introduction Para 3.5.1 & 3.5.2	Gloucestershire Wildlife Trust	Suggest reference the Climate and Ecological Emergencies that have been declared both by National Government and the City Council.	3.5.1 The protection of the natural environment and the fight against climate change has never been higher up the political agenda. In January 2018 the Government published an ambitious '25-year plan to improve the environment' which set several challenging targets. In June 2019 the	3.5.1 The protection of the natural environment and the fight against climate change has never been higher up the political agenda. In January 2018 the Government published an ambitious '25-year plan to improve the environment' which set several challenging targets. <i>In May 2019 the UK parliament declared a climate and ecological emergency.</i> In June	To ensure that the national and local climate emergencies are referenced.

				Government announced that it was committing the UK to net zero greenhouse gas emissions by 2050, the first country in the world to do this. 3.5.2 At the local level the Gloucester City Plan (GCP) seeks to make a difference. The policies in this chapter specifically reflect Key Principles 1, 9 and 11. All the policies aim, directly or indirectly to address climate change.	2019 the Government announced that it was committing the UK to net zero greenhouse gas emissions by 2050, the first country in the world to do this. 3.5.2 At the local level the Gloucester City Plan (GCP) seeks to make a difference. The policies in this chapter specifically reflect Key Principles 1, 9 and 11. <i>In July 2019 the City Council declared a climate emergency committing to make the city carbon neutral by 2050 and the Council's activities by 2030.</i> All the policies aim, directly or indirectly to address climate change.	
PM041	Natural Environment Introduction	Environment Agency	Paragraph 3.5.2 should refer to both green and blue infrastructure.	3.5.2 The plan seeks better quality green infrastructure in Gloucester and areas where nature can recover and thrive.	3.5.2 The plan seeks better quality green/ <i>blue</i> infrastructure in Gloucester and areas where nature can recover and thrive.	At the request of the Environment Agency to ensure blue infrastructure is included and considered.
PM042 (Please note this has been replaced by PM110 below)	Natural Environment Introduction	Marine Management Organisation	This section needs to reference South West Marine Plan.	Add after paragraph 3.5.2.	<i>3.5.3 The area covered by the Gloucester City Plan lies within the South West Marine Plan Area therefore, any development likely to have an impact on this area should take the South West Marine Plan into account as well the Marine Policy Statement. The Marine Management Organisation (MMO) should be consulted as appropriate. Also see the requirement in the supporting text for Policy E7: Renewable energy potential of the River Severn and the canal.</i>	On the advice of the Marine Management Organisation
PM042A	Natural Environment Introduction	Marine Management Organisation	This replaces PM042 above. This section needs to reference the South West Marine Plan.	Add after paragraph 3.5.2.	<i>'3.5.3 Part of the area covered by the Gloucester City Plan lies within the South West Marine Plan Area. Decisions on any development likely to affect this area should take the South West Marine Plan, and the Marine Policy Statement, into account in accordance with s58 of the Marine and Coastal Access Act. The Marine Management Organisation (MMO) should be consulted as appropriate. Also see the requirement in the supporting text for Policy E7: Renewable energy potential of the River Severn and the canal.'</i>	Amended PM042 following discussions with the Marine Management Organisation in preparing the Statement of Common Ground between the Environment Agency, Gloucestershire County Council as Lead Local Flood Authority and Marine Management Organisation.
PM143 (will need to be separated out for the different policies)	Natural Environment Section	Examination	Consider whether the biodiversity policies could be tidied up and duplication avoided.	TBC	TBC	Examination
PM144 (will need to be separated out for the different policies)	Natural Environment Section	Examination	With regard to biodiversity, consider whether 'enhanced' should be used rather than 'net gain'.	TBC	TBC	Examination
PM043 To be considered as part of the Submitted Plan.	E2: Biodiversity and geodiversity	Stroud District Council Gloucestershire County Council – Ecology	No explanation of asterisk. Assume that this is to refer to the legislative requirement to consider overriding public interest (AROPI). The risk, without such clarification, is that projects could be	Where an adverse effect (or effects) on integrity cannot be mitigated, further tests will apply in order to decide whether permission can be granted*.	Where an adverse effect (or effects) on integrity cannot be mitigated, further tests will apply in order to decide whether permission can be granted*. <i>*Habitats Regulations Assessment. Conservation of Habitats & Species Regulations 2017 (As amended) – Paragraph 63 & 64. See also adopted JCS Policy SD9 and Policy E8 of this Plan.</i>	Asterix text was missing.

		Natural England	<p>permitted of a smaller scale than national major infrastructure projects. Suggest inclusion of a policy clause to protect those biodiversity interests (species and priority habitats) on undesignated sites that are listed under the NERC Act. The supporting text should also include reference to the Naturespace Great Crested Newt Licensing.</p> <p>Last sentence of part 1 includes an * that doesn't link to anything. Should show full HRA process which has been set out in the new publication/submission version of the Minerals Local Plan in Table 3 under para 352.</p> <p>Support reference to mobile species forming part of designated features of Severn Estuary SPA and SAC. Clarification of asterisk given.</p>			
PM145	E3: Nature Recovery Area	Examination	Consider reference to Local Nature Partnership in last sentence.	TBC	TBC	Examination
PM044	E4: Trees, woodlands and hedgerows	The Woodland Trust	<p>Strongly support policy. For ancient / veteran trees root protection buffers should be greater than standard buffers.</p> <p>Address the issue of long-term maintenance.</p>	<p>After 3.5.20</p> <p>*Veteran trees are defined as 'trees that are of interest biologically, culturally or aesthetically because of their age, size or condition' (Ministry of Housing, Communities and Local Government; Ancient trees and veteran trees: protecting them from development', 2019).</p> <p>New supporting text.</p>	<p>*Veteran trees are defined as 'trees that are of interest biologically, culturally or aesthetically because of their age, size or condition' (Ministry of Housing, Communities and Local Government; Ancient trees and veteran trees: protecting them from development', 2019). <i>For veteran trees root protection buffers should generally be greater than standard buffers. The Council's Arboriculturist will advise.</i></p> <p><i>3.5.22 New planting should include measures for appropriate long-term maintenance.</i></p>	
PM045	E4: Trees, woodlands and hedgerows	Gloucestershire Wildlife Trust	To make the policy ecologically sound it would be beneficial to state that net gain should be delivered through addition of new trees rather than solely through planting. Include mention of the control of exclusion netting.	<p>Development proposals should seek to ensure there are no significant adverse impacts on existing trees, woodlands or hedgerows and that every opportunity is taken for appropriate new planting on site.</p> <p>New supporting text.</p>	<p>Development proposals should seek to ensure there are no significant adverse impacts on existing trees, woodlands or hedgerows and that every opportunity is taken for appropriate new <i>tree and hedgerow</i> planting on site.</p> <p><i>3.5.23 Through planning conditions, for the protection of wild birds, developers should be dissuaded from using exclusion netting and encouraged to either retain woodland features or undertake works at appropriate times of year.</i></p>	To clarify that planting should be of trees and hedgerows and not just shrubs or plants with limited longevity. To protect nesting birds.

PM045A	E4: Trees, Woodland and Hedgerows	Examination	Amend PM045 to read 'appropriate new planting on site, including trees and hedgerows'.	TBC	TBC	Examination
PM146	E4: Trees, Woodland and Hedgerows	Examination	Remove reference to British Standards in policy and move to supporting text.	TBC	TBC	Examination
PM046	E5: Green infrastructure: Building with Nature	Environment Agency	Recommend policy is renamed 'Green/Blue Infrastructure' as the two are inextricably linked, plus addition of additional supporting text relating to blue infrastructure.	<p>Green Infrastructure: Building with Nature</p> <p>Development must contribute towards the provision, protection and enhancement of Gloucester's Green Infrastructure Network. Contributions should be appropriate and commensurate to the proposal. Major development proposals will be designed in accordance with 'Building with Nature' standards.</p> <p>3.5.21 JCS Policy INF3 and the associated JCS Green Infrastructure Plan (GIP) seek to connect the urban areas of Gloucester with the high-quality Green Infrastructure (GI) assets of the Cotswold's AONB and the Severn Vale. GI and its associated corridors and links are a vital component of maintaining and enhancing health and wellbeing. It also has functions regarding biodiversity, connecting the ecological network, surface water management, climate change adaption and amenity value. Importantly, it also contributes to mitigating recreational impacts on European designated sites, including Cotswold Beechwoods.</p> <p>3.5.22 Development should contribute towards this objective, and to the broader network of GI corridors and assets across the city using SuDS, open space, green roofs and walls and tree planting.</p>	<p>Green/Blue Infrastructure: Building with Nature</p> <p>Development must contribute towards the provision, protection and enhancement of Gloucester's Green/Blue Infrastructure Network. Contributions should be appropriate and commensurate to the proposal. Major development proposals will be designed in accordance with 'Building with Nature' standards.</p> <p>3.5.24 JCS Policy INF3 and the associated JCS Green Infrastructure Plan (GIP) seek to connect the urban areas of Gloucester with the high-quality Green/Blue infrastructure assets of the Cotswold's AONB and the Severn Vale. GI Green/Blue infrastructure and its <i>their</i> associated corridors and links are a vital component of maintaining and enhancing health and wellbeing. They it also has <i>have</i> functions regarding biodiversity, connecting the ecological network, surface water management, climate change adaption and amenity value. Importantly, it <i>local green and blue infrastructure</i> also contributes to mitigating recreational impacts on European designated sites, including Cotswold Beechwoods.</p> <p>3.5.25 Development should contribute towards this objective, and to the broader network of GI <i>Green/Blue</i> corridors and assets across the city using SuDS, open space, green roofs and walls and tree planting. <i>It is important that blue infrastructure such as rivers, streams, canals, lakes, ponds, wetlands and floodplains are fully considered as important assets.</i></p>	On the advice of the Environment Agency.
PM047 To be considered as part of the Submitted Plan.	Policy E5: Green Infrastructure: Building with Nature	Lead Local Flood Authority / Natural England	Support policy but could be made stronger with reference to JCS Green Infrastructure Strategy (or successor document(s)). Incorrect reference included at paragraph 3.5.21 - should refer to 'JCS Green Infrastructure Strategy'.	3.5.21 JCS Policy INF3 and the associated JCS Green Infrastructure Plan (GIP) seek to connect the urban areas of Gloucester with the high-quality Green Infrastructure (GI) assets of the Cotswold's AONB and the Severn Vale.	3.5.24 JCS Policy INF3 and the associated JCS Green Infrastructure Plan (GIP) Strategy seek to connect the urban areas of Gloucester with the high-quality Green Infrastructure (GI) assets of the Cotswold's AONB and the Severn Vale.	
PM114	Policy E5: Green Infrastructure: Building with Nature	POST SUBMISSION: Environment Agency	Add additional supporting text to reiterate the benefits of blue/green corridors.		New paragraph of supporting text: <i>Waterside areas, or areas along known flood routes, can act as Green Infrastructure, being used for recreation, amenity and environmental purposes allowing the preservation of flow routes and flood</i>	To strengthen supporting text.

					<i>storage, and at the same time providing valuable social and environmental benefits contributing to other sustainability objectives.</i>	
PM048	Policy E5: Green Infrastructure: Building with Nature Page 57 Para 3.5.25	Stroud District Council	Natural England are drafting their own benchmark and other industry standards, to Building with Nature, exist. Question the appropriateness of referring to a specific standard. Suggest amended wording referring to 'equivalent standards'.	3.5.25 For major developments, the Council will expect developers to use 'Building with Nature' standards to inform development. Compliance should be demonstrated through the Design and Access Statement and/or a site-based green infrastructure strategy.	3.5.28 For major developments, the Council will expect developers to use 'Building with Nature' standards, <i>or equivalent</i> , to inform development. Compliance should be demonstrated through the Design and Access Statement and/or a site-based green infrastructure strategy.	To reflect that other standards may be available.
PM147	E6: Flooding, sustainable drainage and wastewater	Examination	Remove the word 'betterment' and align with the wording of the NPPF.	TBC	TBC	Examination
PM049	E6: Flooding, sustainable drainage and wastewater	Environment Agency	Strongly recommend final sentence is removed and replaced with wording to expand upon opportunities that may present themselves during plan lifetime – draft wording provided.	Where necessary, financial contributions towards flood risk management infrastructure will be sought through the development process.	Where necessary, financial contributions towards flood risk management infrastructure will be sought through the development process. <i>For all developments in areas with known flooding issues, appropriate mitigation and construction methods will be required including, where appropriate, contributions towards maintenance of existing defenses that benefit the site, development or maintenance of existing flood warning services, development of future flood alleviation projects and/or provision of upstream rural SuDS projects.</i>	As recommended by the Environment Agency.
PM049A	E6: Flooding, sustainable drainage and wastewater	Examination	Revert to wording of the submitted plan, with the additional wording from the EA provided as supporting text.	TBC	TBC	Examination
PM050	E6: Flooding, sustainable drainage and wastewater	EA	Recommend additional sentence inserted after paragraph 3.5.27 regarding flood risk and the design and layout of sites – draft wording provided.	3.5.27 All of Gloucester's watercourses are considered to lack capacity during design rainfall events; any increase in surface water discharge from development sites therefore represents an increase in flood risk.	3.5.30 All of Gloucester's watercourses are considered to lack capacity during design rainfall events; any increase in surface water discharge from development sites therefore represents an increase in flood risk. <i>Flood risk should be considered at an early stage in deciding the layout and design of a site to provide an opportunity to reduce flood risk within the development.</i>	On the advice of the Environment Agency.
PM051	E6: Flooding, sustainable drainage and wastewater	EA	Suggest strengthening wording of paragraph 3.5.37 – draft wording provided.	3.5.37 For calculating the climate change uplift for river flows (i.e. to determine the design flood level for a development which influences the design of the development including floor levels, flow routes, floodplain compensation and safe access and egress arrangements), developers should refer to the latest Environment Agency climate change guidance. Developers are encouraged to assess the Upper End allowances (currently 70% for the Severn River Basin District based on 100 years lifetime of development). Major regeneration projects and infrastructure development are expected to be designed to this level.	3.5.40 For calculating the climate change uplift for river <i>both tidal and fluvial</i> flows (i.e. to determine the design flood level for the appropriate lifetime of <i>a</i> development which influences its <i>design/layout</i> of the development including floor levels, flow routes, floodplain compensation and safe access/egress arrangements), developers should refer to the latest Environment Agency climate change guidance. Developers are encouraged to assess the Upper End allowances (currently 70% for the Severn River Basin District based on 100 years lifetime of development). Major regeneration projects and infrastructure development are expected to be designed to <i>incorporate</i> this level <i>as part of any mitigation</i>	On the advice of the Environment Agency.

					<i>measures.</i>	
PM052 To be considered as part of the Submitted Plan.	E6: Flooding, sustainable drainage and wastewater	LLFA	Suggest minor text amendment	Applicants should contact the Environment Agency at the earliest opportunity to understand the constraints and opportunities of culverted watercourses for their proposals	3.5.43 Applicants should contact the Environment Agency at the earliest opportunity to understand the constraints and opportunities of culverted watercourses for their proposals <i>and because Land Drainage Consent may be required.</i>	To provide clarity on this matter – on the advice of the LLFA.
PM053	E6: Flooding, sustainable drainage and wastewater	LLFA	Add mention of upstream Natural Flood Management (NFM)	New paragraph in supporting text.	<u>3.5.39 Upstream Natural Flood Management</u> <i>Upstream Natural Flood Management (NFM) may be appropriate in some circumstances as this can achieve the complementary benefits of effective flood risk management and habitat creation. Watercourses in greenspace, the rural /urban fringe and in appropriate designated areas should be considered.</i>	On the advice of the LLFA.
PM054	E6: Flooding, sustainable drainage and wastewater	LLFA	Mention of funding for NFM at 3.5.45		<i>3.5.49...Where appropriate money will be secured through the appropriate funding mechanism for upstream Natural Flood Management.</i>	On the advice of the LLFA.
PM055	E7: Renewable energy potential of the River Severn and the canal	Stroud District Council	Any works to the River Severn or ship canal will have to take into account the Southwest Marine Plan – suggested wording provided.	As below for MMO	As below for MMO	On the advice of Stroud District Council.
PM056 To be considered as part of the Submitted Plan.	E7: Renewable energy potential of the River Severn and the canal	Canal and River Trust	Need to correct CRT name. Should EA be consulted regarding proposals to use river water?	3.5.46 According to the Canal and River Trust...	3.5.50 According to the Canal and & River Trust...	Minor correction.
PM057 (Please note this has been replaced by PM57A)	E7: Renewable energy potential of the River Severn and the canal	Marine Management Organisation (MMO)	Reference SW Marine Management Plan	3.5.47 All applications proposing any water generated renewable energy generation (be this for heating, cooling or electricity generation) should consult with the Canal & River Trust and Natural England.	3.5.51 All applications proposing any water generated renewable energy generation (be this for heating, cooling or electricity generation) should consult with the Canal & River Trust, Natural England <i>and the Marine Management Organisation. Consideration should be given to the South West Marine Plan and the Marine Policy Statement.</i>	On the advice of the Marine Management Organisation (MMO)
PM057A	E7: Renewable energy potential of the River Severn and the canal	Marine Management Organisation (MMO)	Reference SW Marine Management Plan	3.5.47 All applications proposing any water generated renewable energy generation (be this for heating, cooling or electricity generation) should consult with the Canal & River Trust and Natural England.	3.5.51 All applications proposing any water generated renewable energy generation (be this for heating, cooling or electricity generation) should consult with the Canal & River Trust, Natural England <i>and the Marine Management Organisation. Decisions on applications affecting the marine area must consider the South West Marine Plan and Marine Policy Statement in accordance with the Marine and Coastal Access Act.</i>	Amended PM057 following discussions with the Marine Management Organisation in preparing the Statement of Common Ground between the Environment Agency, Gloucestershire County Council as Lead Local Flood Authority and Marine Management Organisation.
PM058	E8: Development affecting Cotswold Beechwoods Special Area of Conservation	Gloucestershire Wildlife Trust	Appropriate mitigation should refer to provision of Suitable Alternative Natural Greenspace in partnership with other local authorities/stakeholders, key to reducing pressure on SAC.	3.5.52 Appropriate mitigation measures may include: On-site measures, including for example the provision of open and green space where this can be accommodated. Where this is not possible, financial contributions towards off-site measures such as green infrastructure, habitat management, access management,	3.5.56 Appropriate mitigation measures may include: <ul style="list-style-type: none"> On-site measures, including for example the provision of open and green space where this can be accommodated. Where this is not possible, financial contributions towards off-site measures such as green infrastructure, <i>Suitable Alternative</i> 	To highlight the potential of Suitable Alternative Natural Greenspace.

				residential travel plans, visitor infrastructure and publicity and awareness raising.	<i>Natural Greenspace</i> , habitat management, access management, residential travel plans, visitor infrastructure and publicity and awareness raising.	
PM148	E8: Development affecting Cotswold Beechwoods Special Area of Conservation	Examination	Move reference to Natural England guidance to the supporting text.	TBC	TBC	Examination

F: DESIGN

REF	Plan Reference	Respondents / Stage	Summary	Presubmission Text	Modification	Reason
PM059	F1: Materials and finishes Supporting text New paragraph 3.6.9	GCC Minerals and Waste	Strongly encourage amendment (linked to Key Principle comment) to promote strategically important land-use matters such as resource efficiency and management of waste. Suggested amendment provided.	New paragraph following 3.6.8.	<i>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.</i>	To promote resource efficiency and the effective management of waste through design.
PM115	F1: Materials and finishes	MIQs	Question 53 – What is meant by ‘strongly compliment local distinctiveness’?	Strongly compliment local distinctiveness	Strongly <i>complement</i> local distinctiveness	To correct spelling.
PM149	F1: Materials and finishes	Examination	Improve policy text to make aim clearer.	TBC	TBC	Examination
PM150	F1: Materials and finishes	Examination	Remove the word ‘strongly’ in final sentence.	TBC	TBC	Examination
PM151	F2: Landscape and planting	Examination	Consider how the policy can be made more effective in terms of outline planning applications and general principles.	TBC	TBC	Examination
PM060	F3: Community safety Para 3.6.15	Gloucestershire Wildlife Trust	Policy must acknowledge the potential impacts detrimental impacts on wildlife from safety lighting.	3.6.15 Further guidance can be found in the City Council’s ‘Designing Safer Places’ Supplementary Planning Document, or any future iteration.	<i>3.6.16 Lighting shall have low energy needs and be designed to ensure that it does not create excessive glare to highway users or to residential properties. Lighting that would have a detrimental impact on wildlife will not normally be permitted.</i>	To take account of comments made by Gloucestershire Wildlife Trust.
PM061	F3: Community safety Page 66 New Paragraph under 3.6.14	Highways	Requirement for parking on-plot and avoiding parking courts will place an over-reliance on allocated parking, which will not afford balanced approaches to parking.	New paragraph of supporting text	<i>3.6.17 If in exceptional circumstances rear parking courts are permitted, they should be well lit, overlooked, the same style as other parts of development, and restricted to a maximum of 10 spaces per court. Parking courts should only have one entrance/exit point to ensure that there is no reason for non-residents to travel through the court.</i>	To take account of request from Highways Authority.
PM152	F3: Community safety	Examination	Consider changing ‘straight’ to ‘direct’ in criterion 6.	TBC	TBC	Examination

PM062	F5: Open plan estates Page 67	Gloucestershire Wildlife Trust	Enclosure of land must not degrade ecological networks. Whenever possible, enclosure should be through hedgerows rather than non-permeable fencing and walling.	Policy F5: Open plan estates Enclosure of front and side gardens and unusable strips of land will be allowed on existing open plan estates provided that the land to be enclosed does not adjoin a footpath link and its enclosure does not harm the visual amenity or community safety of the locality.	Policy F5: Open plan estates Enclosure of front and side gardens and unusable strips of land will be allowed on existing open plan estates <i>permitted in open plan estates</i> provided that the land to be enclosed does not adjoin a footpath link. <i>In all cases the and its enclosure does should not harm the visual amenity or, community safety, or degrade the ecological networks of the locality.</i>	To take account of comments made by Gloucestershire Wildlife Trust.
PM063	F5: Open plan estates Page 67 Para 3.6.22	Gloucestershire Wildlife Trust	Enclosure of land must not degrade ecological networks. Whenever possible, enclosure should be through hedgerows rather than non-permeable fencing and walling.	New Paragraph	<i>3.6.26 Open boundaries can provide ease of movement for wildlife. Enclosure of land must not degrade ecological networks and whenever possible, enclosure should be through hedgerows rather than non-permeable fencing and walling. Where non-permeable enclosures are unavoidable mitigation should be made to allow wildlife the opportunity to move across the site.</i>	To take account of comments made by Gloucestershire Wildlife Trust.
PM064	F6: Nationally described space standards	DM	development proposals must demonstrate	3.6.26 Gloucester City Council places great weight on the quality of life and health and wellbeing of its residents. For this reason, the NDDS have been adopted. Development will be robustly assessed against the standards set out in Technical Housing Standards – Nationally Described Space Standard March 2015, or any standards revoking or superseding those standards.	3.6.30 Gloucester City Council places great weight on the quality of life and health and wellbeing of its residents. For this reason, the NDDS have been adopted. Development <i>proposals must demonstrate compliance with, and</i> will be robustly assessed against the standards set out in Technical Housing Standards – Nationally Described Space Standard March 2015, or any standards revoking or superseding those standards.	To clarify that applicants need to demonstrate compliance.

G: SUSTAINABLE LIVING, TRANSPORT AND INFRASTRUCTURE

REF	Plan Reference	Respondents / Stage	Summary	Presubmission Text	Modification	Reason
PM116	Introduction to Section G 'Sustainable living, transport and infrastructure'	POST SUBMISSION: Environment Agency	Strengthening of text relating to climate change	<p>Climate change</p> <p>3.7.4 Climate change is happening now; it is the issue of our times that cannot be ignored. The City Council has recently declared a climate change emergency and the local plan process is a key mechanism and catalyst for action on the ground. There needs to be a rapid step-change in the way we live our lives and undertake our day to day activities in order to prevent the climate changing in such a way that it threatens the planet and future generations.</p> <p>3.7.5 Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in offices and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.</p>	<p>Climate change</p> <p>3.7.4 Climate change is happening now; it is the issue of our times that cannot be ignored. The City Council has recently declared a climate change emergency and the local plan process is a key mechanism and catalyst for action on the ground. There needs to be a rapid step-change in the way we live our lives and undertake our day to day activities in order to prevent the climate changing in such a way that it threatens the planet and future generations.</p> <p>3.7.5 Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in offices and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.</p>	Agree proposed change through Statement of Common Ground with the Environment Agency, Gloucestershire County Council as Lead Local Flood Authority and the Marine Management Organisation.

			<p>3.7.6 Climate change is a theme that runs through the whole of GCP and is a Strategic Objective of the JCS. A number of policies in this plan address climate change and its impacts either directly or indirectly. These include:</p> <ul style="list-style-type: none"> • Requiring new developments to make overall improvements to the natural environment (Policy A1) • Protecting existing trees, woodlands, hedgerows and ensuring every opportunity is taken to increase new planting. (Policy E4) • Requiring development to contribute towards the protection and enhancement of the Green Infrastructure Network. (Policy E5) • Requiring major development to be designed in accordance with 'Building with Nature'. (Policy E5) • Requiring developments are safe from flooding and contribute to flood risk betterment. (Policy E6) • Requiring all development to incorporate SUDs and facilitate watercourse reconstruction. (Policy E6) • Ensuring appropriate attenuation volume rates to allow for the increased rainfall from climate change. (Policy E6) • Supporting the use of the River Severn and canal for renewable energy generation. (Policy E7) • Requiring new landscape and planting to be climate change adaptable. (Policy F2) • Requiring development proposals to conserve and provide net gains to biodiversity. (Policy E2) • Requiring electric vehicle charging points in every new home with a garage or on plot parking space, and 2% of spaces within 100 or more car parking spaces. (Policy G3) • Protecting and improving cycle lanes and maximising opportunities for sustainable active travel. (Policy C1, G4, G5) • Introducing the enhanced water efficiency standards reducing water consumption for each new home. (Policy G8) • Protecting allotments and providing new allotments where there is a need. (Policy C2) • Using green infrastructure to absorb dust and air pollutants from major developments, and increasing planting in AQMA, and around schools and hospitals. (Policy C5) <p>3.7.7 The City Council strongly supports proposals that incorporate sustainable design and construction measures, including renewable energy generation within new development and within development sites.</p> <p>3.7.8 Policies SD3: Sustainable Design and Construction, SD4: Design Requirements, INF2: Flood Risk Management, and INF3: Green Infrastructure of the JCS also provide climate change requirements.</p> <p>3.7.9 This policy also links to the recently published the Gloucestershire Energy Strategy 2019 https://www.gfirstlep.com/downloads/2019/gloucestershire-</p>	<p><i>3.7.6 In order to address the climate emergency, and in compliance with JCS Policy SD3 Sustainable Design and Construction, all applications for new buildings will be expected to demonstrate that all reasonable techniques have been utilised to adapt to and mitigate the effects of climate change.</i></p> <p><i>3.7.7 JCS Policy SD3 requires the submission of an Energy Statement as well as a Waste Minimisation Statement for all major development. The City Plan strongly encourages all applications for new buildings to supply an Energy statement and a Waste Minimisation Statement and this will be a material consideration in determining the sustainability of the proposal in accordance with NPPF Paragraph 8c and 148.</i></p> <p><i>3.7.8 The GCP strongly encourages energy efficiency measures allied with the appropriate use of renewable energy in new buildings and the retrofitting of existing buildings. It is considered that, as technologies and energy markets evolve, there are increasing opportunities to utilise renewables in sustainable design and construction without excessive costs. A proposal's demonstration of this will be a material consideration in determining the application in line with the NPPF's goal of sustainable development and tacking climate change - specifically Paragraphs 8c and 148. Also material will be levels of compliance with, and contributions to achieving targets in:</i></p> <ul style="list-style-type: none"> • <i>The Gloucestershire Energy Strategy 2019</i> • <i>The Gloucestershire Climate Change Strategy 2019</i> • <i>The Gloucester Climate Change Strategy (and future iterations).</i> <p><i>3.7.9 More specifically, climate change is a theme that runs through the whole of GCP and is a Strategic Objective of the JCS. A number of policies in this plan address climate change and its impacts either directly or indirectly. These include:</i></p> <ul style="list-style-type: none"> • Requiring new developments to make overall improvements to the natural environment (Policy A1) • Protecting existing trees, woodlands, hedgerows and ensuring every opportunity is taken to increase new planting. (Policy E4) • Requiring development to contribute towards the protection and enhancement of the Green Infrastructure Network. (Policy E5) • Requiring major development to be designed in accordance with 'Building with Nature'. (Policy E5) • Requiring developments are safe from flooding and contribute to flood risk betterment. (Policy E6) • Requiring all development to incorporate SUDs and facilitate watercourse reconstruction. (Policy E6) • Ensuring appropriate attenuation volume rates to allow for the increased rainfall from climate change. (Policy E6) • Supporting the use of the River Severn and canal for renewable energy generation. (Policy E7) 	
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				<p>energy-strategy-2019.pdf This strategy sets out nine key building blocks. The fifth is: Developing Stronger Planning Policies. These policies should “...enable more local renewables and require zero-carbon and smart enabled new developments. To meet long-term targets, new planning policies need (a) to ensure that all new developments contribute to reducing carbon emissions rather than increasing them and are resilient to climate change and (b) to enable the growth of renewable energy generation and smart energy infrastructure, taking appropriate account of landscape sensitivities.’</p>	<ul style="list-style-type: none"> • Requiring new landscape and planting to be climate change adaptable. (Policy F2) • Requiring development proposals to conserve and provide net gains to biodiversity. (Policy E2) • Requiring electric vehicle charging points in every new home with a garage or on plot parking space, and 2% of spaces within 100 or more car parking spaces. (Policy G3) • Protecting and improving cycle lanes and maximising opportunities for sustainable active travel. (Policy C1, G4, G5) • Introducing the enhanced water efficiency standards reducing water consumption for each new home. (Policy G8) • Protecting allotments and providing new allotments where there is a need. (Policy C2) • Using green infrastructure to absorb dust and air pollutants from major developments, and increasing planting in AQMA, and around schools and hospitals. (Policy C5) <p>3.7.10 The City Council strongly supports proposals that incorporate sustainable design and construction measures, including renewable energy generation within new development and within development sites.</p> <p>3.7.11 Policies SD3: Sustainable Design and Construction, SD4: Design Requirements, INF2: Flood Risk Management, and INF3: Green Infrastructure of the JCS also provide climate change requirements.</p> <p>3.7.12 This policy also links to the recently published the Gloucestershire Energy Strategy 2019 https://www.gfirstlep.com/downloads/2019/gloucestershire-energy-strategy-2019.pdf This strategy sets out nine key building blocks. The fifth is: Developing Stronger Planning Policies. These policies should “...enable more local renewables and require zero-carbon and smart enabled new developments. To meet long-term targets, new planning policies need (a) to ensure that all new developments contribute to reducing carbon emissions rather than increasing them and are resilient to climate change and (b) to enable the growth of renewable energy generation and smart energy infrastructure, taking appropriate account of landscape sensitivities.’</p>	
PM116A	Introduction to Section G ‘Sustainable living, transport and infrastructure’	Examination	Soften wording in paragraph 3.7.8, remove reference to strategies as a material consideration and ensure doesn’t extend beyond JCS.	TBC	TBC	Examination
PM065	G1: Sustainable transport Policy text Page 70	CPRE Gloucestershire	Support commitment to sustainable transport network – should be the first statement in the policy, not the last.	The Council will work closely with Gloucestershire County Council and other organisations regarding all local transport matters. The Council will take direction from the Transport Implementation Strategy, policies of the Joint Core Strategy and Gloucestershire Local Transport Plan and	<i>The City Council strongly supports and encourages improvements to the sustainable transport network.</i> The Council will work closely with Gloucestershire County Council and other organisations regarding all local transport	Reordered to prioritise.

				<p>the Gloucester City Plan Highways Assessment with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the city.</p> <p>The policies set out in the JCS and the Gloucestershire Local Transport Plan will also be used for development management matters and planning application decision making.</p> <p>New development shall provide car parking and cycle provision in accordance with the latest version of Gloucestershire Manual for Streets and any subsequent amendments.</p> <p>The City Council strongly supports and encourages improvements to the sustainable transport network.</p>	<p>matters. The Council will take direction from the Transport Implementation Strategy, policies of the Joint Core Strategy and Gloucestershire Local Transport Plan and the Gloucester City Plan Highways Transport Assessment with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the city.</p> <p>The policies set out in the JCS and the Gloucestershire Local Transport Plan will also be used for development management matters and planning application decision making.</p> <p>New development shall provide car parking and cycle provision in accordance with the latest version of Gloucestershire Manual for Streets and any subsequent amendments.</p> <p>The City Council strongly supports and encourages improvements to the sustainable transport network.</p>	
PM066	G1: Sustainable transport Para 3.7.10	Stagecoach	Paragraph 3.7.10 is inaccurate and should be amended. Suggested amendments provided.	3.7.10....The Gloucestershire Local Transport Plan performs this role better than the GCP can and will be frequently updated. The JCS also provides a transport strategy and policy context for the consideration of transport issues in the development management process.	3.7.10....The Gloucestershire Local Transport Plan performs this role better than the GCP can and <i>is currently under review</i> will be frequently updated. The JCS <i>Review is</i> also <i>expected to</i> provide a transport strategy and <i>reinforced</i> policy context for the consideration of transport issues in the development management process.	Suggestion made by Stagecoach
PM067 To be considered as part of the Submitted Plan.	G1: Sustainable transport	Highways	Correct title.	... The Council will take direction from the Transport Implementation Strategy, policies of the Joint Core Strategy and Gloucestershire Local Transport Plan and the Gloucester City Plan Highways Assessment with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the city.	... The Council will take direction from the Transport Implementation Strategy, policies of the Joint Core Strategy and Gloucestershire Local Transport Plan and the Gloucester City Plan Highways Transport Assessment with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the city.	Correct name of document.
PM068 To be considered as part of the Submitted Plan.	G1: Sustainable transport	Highways	Correct title.	This is appropriate given the significance of joint working in the county and the likelihood that this will continue. In addition, to support the delivery of the quantum of development proposed within the city, a Highways Assessment has been undertaken. This identifies interventions necessary on the highway network necessary to support the GCP.	This is appropriate given the significance of joint working in the county and the likelihood that this will continue. In addition, to support the delivery of the quantum of development proposed within the city, a Highways Transport Assessment has been undertaken. This identifies interventions necessary on the highway network necessary to support the GCP.	Correct name of document.
PM153	G1: Sustainable transport	Examination	Remove references to strategies/other documents from policy, add to supporting text. Set out general principles to parking.	TBC	TBC	Examination
PM175	G1: Sustainable transport	Examination	Set out principles in relation to parking.	TBC	TBC	Examination
PM069	G2: Charging infrastructure for electric vehicles	L&Q Estates	No objection to the principle of the policy – not clear of sentence relating to exceptions relates to all developments or non-	For non-residential development which provides 100 or more car parking bays, at least 2% of bays should be utilised for the provision of rapid charging points for electric vehicles. Exceptions will only be made where the applicant can demonstrate the local electricity network is technically unable to support this.	For non-residential development which provides 100 or more car parking bays, at least 2% of bays should be utilised for the provision of rapid charging points for electric vehicles. Exceptions, <i>for both residential and non-residential development</i>, will only be made where the applicant can	To provide clarity.

			residential development only.		demonstrate the local electricity network is technically unable to support this.	
PM070	G2: Charging infrastructure for electric vehicles	Gloucestershire County Council – Highways Development Management	Is the policy going to specify what kind of charging point is required? How can be it ensured in the long term that the charging point for each home is correct? What is the justification for the 2%? Does it allow flexibility to change depending on future demand? Do not support highways capacity use for parking in high street type locations as a result of change of uses or where development results in or requires the increase of permit provision in areas over capacity.	3.7.14 In terms of the technical requirements of this policy; for one dwelling the minimum requirement is a single phase 13-amp socket. This is likely to be upgraded by the homeowner as technologies change.	3.7.14 In terms of the technical requirements of this policy; for one dwelling the minimum requirement is a <i>charge point with a minimum power rating output of 7kW, be fitted with a universal socket that can charge all types of electric vehicles currently on the market and meet the relevant safety and accessibility requirements.</i> single phase 13-amp socket. This is likely to be upgraded by the homeowner as technologies change.	To provide more detail and reflect language used by Highways Authority in Development Management. Formed part of the original viability assessment.
PM154	G2: Charging infrastructure for electric vehicles	Examination	Clarify how the policy should be interpreted for different forms of residential development, with regard to paragraph 3.7.15.	TBC	TBC	Examination.
PM071 To be considered as part of the Submitted Plan.	G3: Cycling	Gloucestershire Wildlife Trust	Evidence that green cycling routes are more likely to be used, plus contribute to enhancement of ecological networks – this should be considered as part of improvements.	3.7.16 Gloucester is relatively flat and is a good place to cycle. Cycling is increasingly popular and arguably if routes and facilities were better and safer, the take-up would be even greater. Cycling as an activity and a mode of transport has very few downsides. It is an effective means of transport that can significantly reduce car trips. Cycling contributes towards reducing carbon emissions and improving air quality. It assists with the adoption of healthier lifestyles and can help existing transport networks in towns and cities to run more efficiently.	3.7.16 Gloucester is relatively flat and is a good place to cycle. Cycling is increasingly popular and arguably if routes and facilities were better and safer, the take-up would be even greater. Cycling as an activity and a mode of transport has very few downsides. It is an effective means of transport that can significantly reduce car trips. Cycling contributes towards reducing carbon emissions and improving air quality. It assists with the adoption of healthier lifestyles and can help existing transport networks in towns and cities to run more efficiently. <i>There is evidence that 'green' cycling routes are more likely to be used and that they contribute to the enhancement of ecological networks. These factors should be considered when improvements are made.</i>	Adds to the level of detail in the supporting text.
PM072 To be considered as part of the Submitted Plan.	G3: Cycling	Canal and River Trust	Policy/supporting text needs to reflect that the towpath isn't a dedicated cycle path and the needs of other users.	New supporting text paragraph 3.7.18	<i>3.7.18 With regard to the Canal towpath, this is not a dedicated cycle path and current and future use must reflect the needs of other users.</i>	To provide clarity on the uses of the Canal towpath.
PM155	G3: Cycling	Examination	Put reference to Local Transport Plan in supporting text	TBC	TBC	Examination
PM073 To be considered as part of	G4: Walking	Gloucestershire Wildlife Trust	Evidence that green walking routes are more likely to be used, plus contribute to	3.7.19 Regularly walking in a safe and pleasant environment can have major benefits for health and wellbeing and where there is an opportunity for walking there is generally also the opportunity for jogging / running. Good quality, connected	3.7.20 Regularly walking in a safe and pleasant environment can have major benefits for health and wellbeing and where there is an opportunity for walking there is generally also the opportunity for jogging / running. Good quality, connected	Adds to the level of detail in the supporting text.

the Submitted Plan.			enhancement of ecological networks – this should be considered as part of improvements.	and accessible footpaths can encourage people to walk to access local shops, services or sustainable transport connections, supporting more active lifestyles and reducing the use of the private car.	and accessible footpaths can encourage people to walk to access local shops, services or sustainable transport connections, supporting more active lifestyles and reducing the use of the private car. <i>There is evidence that 'green' walking routes (e.g. pavements with trees) are more likely to be used and that they contribute to the enhancement of ecological networks. These factors should be considered when improvements are made.</i>	
PM156	G5: Broadband connectivity	Examination	Amend 'within' to 'without' in paragraph 3.7.21.	TBC	TBC	Examination
PM117	G6: Telecommunications infrastructure	MIQs	Question 62 – Does policy G6 provide positive support for the expansion of electronic communications...?	Development proposals for telecommunications infrastructure must demonstrate that the development would not have an adverse impact upon...	Development proposals for telecommunications infrastructure will be permitted where it can be demonstrated that... Similarly, paragraph 3.7.24 would benefit from being modified to make more positive and better aligned with the NPPF. TBC.	To make the policy wording and supporting text more positive.
PM157	G6: Telecommunications infrastructure	Examination	Reword policy to be more positive / consistent with the NPPF. Remove reference to 'health concerns'.	TBC	TBC	Examination
PM074	G7: Water efficiency	LLFA	Provide a description of how efficiency will be achieved. Focus on rainwater usage as opposed to mains water. Mention the water quality benefits of SuDS.	Following supporting text paragraph 3.7.27	<i>3.7.29 Developers can achieve efficiency by means of the installation of efficient showers and toilets as well as baths which are designed to hold less volume and spray taps throughout buildings. Outdoors the use of water butts and more advanced rainwater harvesting methods are encouraged, moving away from a reliance on mains water. Developers should utilise rainwater recycling as an effective SuDS technique for reducing flood risk and improving water efficiency. Effective SuDS can also lead to water quality benefits.</i>	Added on the advice of the LLFA to provide extra information and clarity to the supporting text.
PM075	G8: Review Mechanism Page 75 Para 3.7.30	Stagecoach	Pre-judging what should be prioritised in terms of developer contributions in neither appropriate nor effective in achieving the objectives of sustainable development in the context of the NPPF and JCS Policy INF8. Paragraph 3.7.30 should be amended.	3.7.30 Priority will be given to the delivery of affordable homes over other policy requirements.	3.7.30 Priority will be given to the delivery of affordable homes over other policy requirements.	Delete as predetermines what is required in order to achieve sustainable development.

SITE ALLOCATIONS

REF.	Plan Reference	Respondents / Stage	Summary	Pre- Submission Text	Modification	Reason
PM158	Development requirements	Examination	Make clear the housing and employment requirements the GCP intends to achieve.	TBC	TBC	Examination
PM159	Development	Examination	Provide supportive approach for enabling windfall sites to come forward.	TBC	TBC	Examination

PM160	Development	Examination	Set out positive approach for the delivery of sites for the Gypsy, Traveller and Travelling Showpeople community.	TBC	TBC	Examination
PM161	Site allocations	Examination	Explain the purpose of an indicative capacity and explain it is isn't a maximum	TBC	TBC	Examination
PM162	Site allocations	Examination	Consider better way of structuring what is policy and what is helpful supporting text.	TBC	TBC	Examination
PM076	Site allocations	Home Builders Federation	5-year housing land supply. Discrepancy between stated capacity and allocations. Should be rectified before Submission. Confirm windfall allowance is still acceptable. Justify lapse rates, windfall, lead-in times and delivery rates. Confirm 10% delivery on sites of 1ha or less. Include housing trajectory in plan.		Insert up-to-date housing trajectory under paragraph 4.13 of the Site Allocations section of the GCP.	To provide information regarding the most recent housing trajectory for Gloucester City.
PM077 To be considered as part of the Submitted Plan.	Site allocations	Highways		4.7 The site allocation is underpinned by a comprehensive evidence base including a Flood Risk Assessment (Level 2), Highways Assessment and Infrastructure Delivery Plan to understand the likely infrastructure requirement required to support delivery.	4.7 The site allocations are underpinned by a comprehensive evidence base including a Flood Risk Assessment (Level 2), Highways Transport Assessment and Infrastructure Delivery Plan to understand the likely infrastructure requirement required to support delivery.	Request from Highways Authority
PM078	Page 79	Highways England	Include reference to INF1.		<i>4.17 In accordance with policy INF1 of the adopted JCS: "Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan"</i>	Requested by Highways England to provided further clarity that any potential impacts from developments, including windfall, will be duly considered and adequately mitigated as part of the planning application process.
PM079	SA01: Land at the Wheatridge Site schedule	GCC Minerals & Waste	Include reference to Mineral Consultation Area	Insert after Biodiversity bullet points.	<i>Mineral Consultation Area (MCA) The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM176	SA01: Land at the Wheatridge	Examination	Clarify what the 'Ash Path' is and what the means of access to the site would be (supporting text).	TBC	TBC	Examination
PM080	SA02: Land at Barnwood Manor	GCC Minerals & Waste	Include reference to Mineral Consultation Area	Insert after Biodiversity bullet points.	<i>Mineral Consultation Area (MCA) The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the</i>	Request from Minerals and Waste Planning Authority.

					<i>MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	
PM081	SA03: Former Prospect House, 67 – 69 London Road	GCC Minerals & Waste	Include reference to Mineral Consultation Area	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM082		Pall Mall Estates Limited	Strong support for allocation. Policy can accommodate a higher number of dwellings – suggest increased to ‘approximately 60’. Red line boundary needs to be amended to include rear of property at 69 London Road and 1 Heathville Road.	Red line boundary Gross site area: 0.35 ha Approximately 30 residential dwellings.	<i>Amend red line boundary Gross site area: 0.35 0.40 ha Approximately 30 60 residential dwellings. See Appendix 1 and revised policies map for revised red line boundary.</i>	Request from Pall Mall Estates (owners). A small car park at the rear of No.1 Heathville Road is also in the ownership of Pall Mall Estates.
PM083	SA03: Former Prospect House, 67 – 69 London Road	Kingsholm and Wotton Neighbourhood Partnership	No justification for identified capacity – could accommodate more? Replace with a figure that reflects a more thorough and detailed assessment of the site.	Approximately 30 residential dwellings.	Approximately 30 60 residential dwellings.	Agree with respondent as well as site owner on this matter.
PM163	SA03: Former Prospect House, 67 – 69 London Road	Examination	Consider appropriateness design requirements relating to biodiversity e.g. green roofs.	TBC	TBC	Examination
PM084	SA04: Former Wessex House, Great London Road	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM164	SA04: Former Wessex House, Great London Road	Examination	Increase indicative capacity to approximately 40 dwellings.	TBC	TBC	Examination
PM085	SA05: Land at Great Western Road Sidings	GCC Minerals & Waste	Include reference to Mineral Consultation Area and need for mitigation measures.	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary. <u>Mitigation measures</u> 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>	Request from Minerals and Waste Planning Authority.
PM165	SA05: Land at Great Western Road Sidings	Examination	Increase indicative capacity following assessment exercise, subject to viability.	TBC	TBC	Examination
PM086	SA07: Lynton Fields, Land East of	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying</i>	Request from Minerals and Waste Planning Authority.

	Waterwells Business Park				<i>sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	
PM087	SA08: King's Quarter	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM088	SA09: Former Quayside House, Blackfriars	Environment Agency	Some concern regarding viability of site over its lifetime from a flood risk perspective. Policy may require improvement to address concerns.	Add third bullet point in Flood Risk section.	<ul style="list-style-type: none"> <i>Opportunities to improve flood protection along the River Severn as part of a wider regeneration scheme should be explored in consultation with the EA.</i> 	On the advice of the Environment Agency.
PM089	SA10: Former Fleece Hotel & Longsmith Street Car Park	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM166	SA10: Former Fleece Hotel & Longsmith Street Car Park	Examination	Replace 'mixed-use' with main town centre uses.	TBC	TBC	Examination
PM090	SA11: Land rear of St Oswalds Retail Park	GCC Minerals & Waste	Include reference to Mineral Consultation Area and Land contamination	Insert after Flood risk bullet points.	<p><i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i></p> <p><i><u>Land contamination</u> 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>	Request from Minerals and Waste Planning Authority.
PM091		Environment Agency	Minor impact from flooding and concerns over previous use as landfill (contamination and land movement). Require improvements to be made to policy to address concerns.	Insert after Flood risk bullets.	<i><u>Ground & surface water quality</u> Development proposals will have had to adopt specific drainage techniques to address the problems of previous contamination and land movement. This is in the interests of protecting ground and surface water quality.</i>	On the advice of the Environment Agency.
PM092	SA12: Land at Rea Lane, Hempsted	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM093	SA13: Former Colwell Youth and Community Centre	GCC Minerals & Waste	Include reference to Mineral Consultation Area and need for mitigation measures.	Insert after Biodiversity bullet points.	<i><u>Mineral Consultation Area (MCA)</u> The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying</i>	Request from Minerals and Waste Planning Authority.

					<i>sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i> <u>Mitigation measures</u> <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>	
PM094	SA15: Land South West of Winnycroft Allocation	Environment Agency	Comment should be added for the site to contribute to ongoing SUD and Twyver flood mitigation scheme (City Council and EA).	Insert after Biodiversity bullet points.	<u>Flood mitigation</u> <i>The site should reasonably contribute to the ongoing Sud & Twyver flood mitigation scheme being led by the City Council in conjunction with the EA.</i>	On the advice of the Environment Agency.
PM095	SA16: Land off Lower Eastgate Street	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<u>Mineral Consultation Area (MCA)</u> <i>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM167	SA16: Land off Lower Eastgate Street	Examination	Consider appropriateness design requirements relating to biodiversity e.g. green roofs.	TBC	TBC	Examination
PM096	SA17: Land South of Triangle Park	GCC Minerals & Waste	Include reference to Mineral Consultation Area and need for mitigation measures.	Insert after Biodiversity bullet points.	<u>Mineral Consultation Area (MCA)</u> <i>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i> <u>Mitigation measures</u> <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>	Request from Minerals and Waste Planning Authority.
PM097	SA17: Land South of Triangle Park	Gloucestershire Wildlife Trust	GWT support biodiversity measures identified in policy. Create 15m buffer between development and railway line.	Insert additional biodiversity bullet point.	<ul style="list-style-type: none"> • Create appropriate 15m planting buffers to help mitigate any noise, vibration and air pollution from the railway line and integrate with the wider GI network. • <u>Creation of 15m buffer between development area and railway line.</u> 	
PM098 To be considered as part of the Submitted Plan.	SA18: Jordan's Brook House	Planning Policy Team	Remove reference to policy requirement 'Retention of naturalised watercourse' as it doesn't exist.	<u>Biodiversity</u> <ul style="list-style-type: none"> • Improve Green Infrastructure links via a corridor to Land at Barnwood Manor (Site Allocation SA02) and Barnwood Arboretum / Park and Local Wildlife Site. • Retention of naturalised watercourse. 	<u>Biodiversity</u> <ul style="list-style-type: none"> • Improve Green Infrastructure links via a corridor to Land at Barnwood Manor (Site Allocation SA02) and Barnwood Arboretum / Park and Local Wildlife Site. • Retention of naturalised watercourse. 	To remove a policy requirement to a naturalised watercourse, as it doesn't exist.
PM099	SA18: Jordan's Brook House	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<u>Mineral Consultation Area (MCA)</u> <i>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM168	SA18: Jordan's Brook House	Examination	Reduce capacity to approximately 10 dwellings to	TBC	TBC	Examination

			account for more recent proposal for a new medical facility.			
PM100	SA19: Land off Myers Road	GCC Minerals & Waste	Include reference to Mineral Consultation Area and need for mitigation measures.	Insert after Biodiversity bullet points.	<i>Mineral Consultation Area (MCA)</i> <i>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i> <i>Mitigation measures</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>	Request from Minerals and Waste Planning Authority.
PM101	SA20: White City Community Facility	GCC Minerals & Waste	Include reference to Mineral Consultation Area.	Insert after Biodiversity bullet points.	<i>Mineral Consultation Area (MCA)</i> <i>The site allocation lies within a Mineral Consultation Area (MCA) due to the recorded presence of underlying sand & gravel resources. Early engagement with the MWPA is strongly encouraged to establish whether a Mineral Resource Assessment (MRA) is necessary.</i>	Request from Minerals and Waste Planning Authority.
PM102	SA21: Part of West Quay, The Docks	Canal and River Trust	Support allocation but increase capacity to more than 20 which is too low.	Main town centre uses, including approximately 20 dwellings.	Main town centre uses, including approximately 20 dwellings <i>or more depending on specific proposals and layout.</i>	Request from CRT as landowner.
PM169	SA21: Part of West Quay, The Docks	Examination	Reword to make clear that Alexander Warehouse is a part of the allocation, but not available as part of the redevelopment scheme.	TBC	TBC	Examination
PM103	SA22: Land adjacent to Secunda Way Industrial Estate	Environment Agency	Flood risk may impact upon access to and from the site off Secunda Way at the northern end of the site and should be highlighted within the site requirements.	Insert after Biodiversity bullet points.	<i>Flood risk</i> <i>Flood risk may impact upon access and to and from the northern end of the site.</i>	On the advice of the Environment Agency.
PM170	SA22: Land adjacent to Secunda Way Industrial Estate	Examination	Amend policies map to remove area now consented.	TBC	TBC	Examination

MONITORING FRAMEWORK

REF	Plan Ref.	Respondents / Stage	Summary	Presubmission text	Modification	Reason						
PM104 To be considered as part of the Submitted Plan.	Monitoring framework	Gloucestershire Wildlife Trust	To meet policy and legislative commitments to biodiversity net gain this will require monitoring using the current Defra approved metric. The impact of development on the resilience of ecological networks should also be measured to demonstrate compliance with local and national policy commitments, which are likely to be enshrined in law by the Environment Act.	E: Natural Environment <table border="1"> <thead> <tr> <th>JCS INDICATOR</th> <th>SOURCE</th> <th>FREQUENCY</th> </tr> </thead> <tbody> <tr> <td>Net changes to Key Wildlife Sites, Special Areas of Conservation, SSSIs, Special Protection Areas, Ramsar</td> <td>Internal</td> <td>Annual</td> </tr> </tbody> </table>	JCS INDICATOR	SOURCE	FREQUENCY	Net changes to Key Wildlife Sites, Special Areas of Conservation, SSSIs, Special Protection Areas, Ramsar	Internal	Annual	To be confirmed.	To strengthen monitoring around public health as suggested by the Gloucestershire Local Nature Partnership.
JCS INDICATOR	SOURCE	FREQUENCY										
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Gloucestershire County Council - Public Health	Suggested health indicators to measure. Can provide data.	C: Healthy communities <table border="1"> <thead> <tr> <th>JCS INDICATOR</th> <th>SOURCE</th> <th>FREQUENCY</th> </tr> </thead> <tbody> <tr> <td>Number of essential community facilities lost or gained through the development process.</td> <td>Internal</td> <td>Annual</td> </tr> </tbody> </table>			JCS INDICATOR	SOURCE	FREQUENCY	Number of essential community facilities lost or gained through the development process.	Internal	Annual	C: Healthy communities <table border="1"> <thead> <tr> <th>JCS INDICATOR</th> <th>SOURCE</th> <th>FREQUENCY</th> </tr> </thead> <tbody> <tr> <td>Number of essential community facilities lost or gained through the development process.</td> <td>Internal</td> <td>Annual</td> </tr> <tr> <td>Number of air quality</td> <td>Internal</td> <td>Annual</td> </tr> </tbody> </table>			JCS INDICATOR	SOURCE	FREQUENCY	Number of essential community facilities lost or gained through the development process.	Internal	Annual	Number of air quality	Internal	Annual	To strengthen monitoring around public health as suggested by the Public Health Team at Gloucestershire County Council.	
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PM177	Monitoring framework	Examination	<p>Include indicators for the following (in some cases, subject to the policies being found sound):</p> <ul style="list-style-type: none"> • Housing delivery (link to JCS indicator) • Gypsy, Traveller and Travelling Showpeople delivery (link to JCS indicator) • Specialist housing • Employment and skills plans • Employment land • Hot food takeaways in 400m of an entrance to a secondary school or college. • Biodiversity net gain • Nationally Described Space Standards • Cycle parking provision for dwellings • Car charging infrastructure • Broadband connectivity 	TBC	TBC	Examination																																				

POLICIES MAP

REF.	Plan Ref.	Respondents / Stage	Summary	Presubmission Text	Acceptable change	Reason
PM105	Policies map	Pall Mall Developments	Amend red line boundary of SA03 Former Prospect House to reflect land ownership.	See map.	See Appendix 1 and submission policies map.	To reflect correct land ownership.
PM178	Policies map	Examination	Ensure policies map only relates to policies contained in the City Plan.	TBC	TBC	Examination
PM179	Policies map	Examination	Ensure all policies that have a geographical location are on the policies map.	TBC	TBC	Examination
PM180	Policies map	Examination	Update policies map to include:	TBC	TBC	Examination

			<ul style="list-style-type: none"> Green/blue infrastructure Key views of the Cathedral Amended extent of SA22 Land adjacent to Secunda Way Industrial Estate following planning permission. 			
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SECTION 6: STRATEGIC POLICIES AND PROPOSALS IN THE JOINT CORE STRATEGY AND GLOUCESTER CITY PLAN

REF.	Plan Ref.	Respondents / Stage	Summary	Presubmission Text	Acceptable change	Reason
PM171	Section 6	Examination	Delete Section 6 – GCP provides non-strategic policies only.	Delete Section 6.	Delete Section 6.	Examination.

SECTION 7: SUPERCEDED POLICIES

REF.	Plan Ref.	Respondents / Stage	Summary	Presubmission Text	Acceptable change	Reason
PM181	Superceded policies	Examination	Confirm that all remaining policies from the Local Plan 1983 would be replaced by the City Plan.	TBC	TBC	Examination

SECTION 8: GLOSSARY

REF.	Plan Ref.	Respondents / Stage	Summary	Presubmission Text	Acceptable change	Reason
PM106 To be considered as part of the Submitted Plan.	Glossary	Highways England		Highways Agency - An executive agency of the Department for Transport. The Highways Agency is responsible for operating, maintaining and improving the strategic road network of England.	Highways Agency <i>England</i> - An executive agency of the Department for Transport. The Highways <i>Agency England</i> is responsible for operating, maintaining and improving the strategic road network of England.	To reflect the correct name of the organisation.
PM107 To be considered as part of the Submitted Plan.	Glossary	Highways England	Transport assessment in glossary but not in document	Transport Assessment – A comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences.	Transport Assessment – A comprehensive review of all the potential transport impacts of a proposed development or re-development, with an agreed plan to mitigate any adverse consequences.	Transport Assessment is not mentioned in main text.