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Gloucester City Local Plan Examination

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Dear Mr Gooch

Gloucester City Plan 2011- 2031: post hearing letter

1. As discussed on the last day of the hearings, I am pleased to provide you with my initial findings. I have found that the production of the Gloucester City Plan (GCP) has met the Duty to Co-operate and is legally compliant.
2. The plan, as submitted, is unsound but could be made sound through main modifications (MMs). To do this, I would ask the Council to prepare a schedule of potential MMs for formal consultation based on the MMs referred to in this letter and the accompanying appendix. This appendix also sets out any consequential amendments which would be necessary to the policies map.
3. I have concluded that these MMs are necessary, having taken into account the evidence, and documents which were considered at the examination hearings, my visits to the City, together with the additional information which I had requested, and which was made available for comment. Following the hearings, I have also undertaken a site visit of the Netheridge Waste Water Treatment Plant and the surrounding area.
4. This letter highlights several matters. However, my reasoning for all my recommended MMs will be set out in my final report to the Council. This will be provided after a period of formal consultation has taken place. The timetable for which should be agreed with me via the Programme Officer.

Status of the Plan

5. The GCP is the daughter plan to the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011- 2031. The adopted JCS sets out the strategic policies for the three districts, including the quantum of development which is expected to be delivered over the plan period. The most recently adopted Local Development Scheme (LDS) (CD009) describes the role of the GCP as, 'Delivers the JCS locally. Identifies and allocates local sites for development. Contains criteria-based policies against which all development within the City will be determined.' This explanation, and the short length of the plan period, is consistent with the description of non -strategic policies within the Framework.

6. However, some of the policies in the GCP, as submitted, are referred to as being strategic. Consequently, MMs are required to ensure that references to any of the policies being strategic are removed, and to make clear how the GCP relates to the policies of the JCS. This is to ensure that there is no ambiguity within the plan, as to its limited role to implement the policies of the JCS, and, where appropriate, to refine them without overreaching the parameters set within the JCS.

Viability

7. In principle, the quantum of development proposed to be provided within the GCP should be viable as it has been tested as part of the JCS and as part of the CIL examination. Nonetheless, the additional costs resulting from the policies of the Plan, as submitted, have been tested, as have other scenarios, including the reduction in affordable housing requirement from 25% to 20%. Subject to a MM, requiring the reduction in the proportion of dwellings being required to meet Building Regulations requirement M4 (2), from 50% of all housing developments to 25%, I am content that the total cumulative costs of all relevant policies will not undermine deliverability of the plan.

Housing provision

8. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) sets out the amount of housing development and its distribution for the three planning authorities. Policy SP1 of the JCS sets out a minimum housing requirement of 14, 359 homes for Gloucester.

9. It was accepted, at the time of the JCS examination, that it would be difficult for Gloucester to make provision for all its housing needs within its administrative boundaries. As such, the JCS in Table 2 SP2b: Apportionment of Strategic Allocation sites and District Capacity for Gloucester, Cheltenham and Tewkesbury references Gloucester City's

supply of c 13, 287 dwellings. This is made up of completions, commitments, strategic allocations, both within and outside of Gloucester's administrative boundary, together with an urban capacity of 7,772 dwellings.

10. The most recent completion figure for dwellings within Gloucester's administrative boundary, set out in Exam 7a, is 5,070 dwellings since the beginning of the JCS plan period. The windfall allowance, of 64 dwellings per annum, has already been agreed as part of the examination of the adopted JCS of which the GCP forms the daughter document. The examination of the GCP is not the appropriate vehicle in which to reappraise this figure, which, over the remaining plan period, could bring forward a further 512 dwellings.

11. I have amended the total of the extant non-strategic commitments¹. Therefore, taking into account the extant non-strategic commitments of 1769 dwellings, and including the 92 dwellings at the former oil storage depot, which is identified as a deliverable Brownfield Register Site around 300 dwellings would be required to be allocated, and delivered, within the GCP to meet the figure of 7,772 dwellings.

12. With the MMs discussed at the hearings, the plan allocates sites which could provide capacity for around 920 dwellings. Consequently, I conclude, even if a substantial proportion of the sites did not come forward for whatever reason, or no additional windfall housing was realised, I am confident the minimum capacity would have been provided for, and thus the plan would be consistent with Policy SP2 of the JCS.

13. However, this planned quantum of housing, including windfalls, falls short of the 14,359 homes referred to within Policy SP1 of the JCS.

14. Consequently, even though, with the MMs proposed, the Council has provided for a potential of 920 new dwellings, this still leaves, at the most optimistic interpretation of the Council's housing figures, a substantial gap between Gloucester's housing needs and the availability of suitable sites.

15. The JCS is predicated on their being limited opportunities for housing developments within Gloucester's urban area. I am aware that the keenly awaited, and oft delayed, review of the JCS is considered to be the appropriate arena in which to progress the identification of additional

¹ I have amended the figure by removing the 9 dwellings whose permissions have expired or were in outline only. I have also removed the 36 units at land at Secunda Way where committee approval had been given. However, the S106 agreement had not been signed within the monitoring period, and therefore permission had not been granted.

strategic sites. Nonetheless, there is nothing within the JCS, subject to Policy SD10, which would preclude a more positive approach to the provision of additional housing within the City's administrative boundary, and which would go some way towards bridging the gap in housing provision which is set out within the JCS.

16. As it stands, whilst I am aware that the GCP together with the JCS will make up the development plan, and that with the MMs which I have requested there will be a clearer articulation of the relationship of the two plan documents, with specific reference to setting out how the policies of the GCP relate to specific policies within the JCS. Nonetheless, MMs are required to set out a positive approach to the bringing forward of sites for housing consistent with Policy SD10 of the JCS and Policy SP2 of the JCS. The urban capacity figure of 7,772 identified and planned for within the GCP, should be considered as a minimum figure, and reference made to the housing requirement of at least 14,359 dwellings in Policies SP1 and SP2 of the JCS.

17. This will require further references within the supporting text of the plan, and amendments to Policy A1 consistent with Paragraph 69 c) of the Framework and the section Making Effective Use of Land.

18. Gloucester's housing supply derives from sites inside and outside of its administrative boundary. The GCP's remit only applies to land located within the district. I have found that the Council has a marginal five-year supply of deliverable housing. However, in common with my colleagues, who have examined the Cheltenham Local Plan 2011- 2031, and the Tewkesbury Borough Plan 2011- 2031, both of which are subsidiary plans like the GCP, I consider that the ability to provide a five- year supply of deliverable housing on adoption is not essential to my examination of the plan.

Affordable Housing

19. Following on from my conclusion above regarding strategic policies, the affordable housing policy A2 should be deleted, and reliance placed on Policy SD12 of the JCS.

Gypsies and Travellers and Travelling Showpeople

20. Based on the Gypsy and Traveller Accommodation Assessment carried out in 2017, the supporting text to JCS Policy SD13 sets out the number of pitches and plots that are required in each district between 2016 and 2031, both for those that meet the definition in the Planning Policy for Traveller Sites, and for those that do not.

21. To satisfy the need identified in the 2017 study, a further two pitches are required for non-travelling Gypsies and Travellers, and 16 plots for Travelling Showpeople, 8 of which are travelling and the other 8 are unknown.

22. The plan as submitted does not include any allocations for either Gypsies and Travellers, or for Travelling Showpeople. A number of sites within Gloucester's administrative boundary have been considered for allocations for both Gypsy and Traveller sites and Travelling Showpeople. I am satisfied, from the detailed evidence contained within Ex19, that the Council has undertaken a rigorous search for appropriate sites, including those owned by public bodies. None of the sites put forward were appropriate, or available to be allocated, given flood risk and land instability matters, as well as odour issues associated with the Netheridge Waste Water Treatment Plant and ownership constraints.

23. However, I am also satisfied that the Council continues to actively work to bring forward sites, wherever possible. For example, it is exploring, with the Environment Agency and Homes England, whether land at Spinnaker Park could be made suitable and viable to provide land for Travelling Showpeople.

24. This situation is consistent with the Statement of Common Ground (SoCG8) between Gloucester and other authorities. This states that Gloucester is constrained, and that the other authorities will consider how to assist Gloucester in meeting its needs through Local Plan reviews.

25. A draft allocation, for 8 plots for Travelling Showpeople at Whaddon, has been made within the emerging Stroud Local Plan to help meet Gloucester's unmet needs. It is possible this allocation may not be included within the final adopted plan, given objections. Moreover, my understanding is that it is intended to be on land safeguarded for Gloucester's future needs. Nonetheless, it does demonstrate joint working to bring forward sites, albeit it does not immediately address the current requirement.

26. Ideally, the plan would have identified sufficient allocations to meet Gloucester's unmet needs, either through the GCP, as submitted or through sites in neighbouring districts. However, I am convinced the Council continues to actively work with its neighbours, as well as within its administrative boundary, to attempt to bring forward appropriate sites. Moreover, in the absence of suitable site allocations, Policies SD11 and SD13 of the JCS provide the appropriate policy mechanism to deliver additional sites for both travelling and non-travelling households.

Site allocations

27. As submitted, it is unclear whether the text within boxes SA01-SA22 should be given the status of policy. Therefore, in order for the policies to be effective, a means should be found to differentiate between any background information which may be useful, and akin to a supplementary planning document, and the actual allocation.

28. Where site allocations are currently being developed, such as at Kings Quarter and land at Rea Lane, these should be removed as allocations.

29. In addition, Lynton Fields and Secunda Way should be deleted as site allocations, given that the landowners have stated that they do not consider that the land is available for the uses proposed.

Next steps

30. Appendix 1 sets out a list of where I consider potential MMs should be made. This list includes MMs which have previously been discussed at the examination hearings, based on the Council's Schedule of Possible Modifications (CD010a), as well as those which are the result of further consideration.

31. In preparing the schedule of potential MMs for consultation, the Council should liaise with me, via the Programme Officer, to refine the detailed wording. Once I am happy with the wording, the potential MMs will then be the subject of formal public consultation.

32. The Policies Map is a geographic illustration of where the various policies in the GCP apply, and certain amendments are necessary to it for the geographic application of the policies to be justified and effective. Where the Policies Map needs to be amended from that submitted with the GCP, the changes should be published in a schedule alongside the MMs and also form part of the consultation. These changes include deleted or added sites and amended boundaries and are listed in the appendix.

33. To avoid any doubt, I am not inviting comments about the contents of this letter. There will be the opportunity, at the formal consultation stage, for those who wish to make representations on the potential main modifications.

34. I will take into account the responses to the consultation, before reaching my final conclusions, on the MMs required, in order that I can find the Plan sound. However, the general expectation is that issues

raised, following the consultation of the draft MMs, will be considered through the written representations process. Further hearing sessions will only be scheduled exceptionally.

35. My reasoning will be set out in my report to the Council which will accompany the schedule of main modifications.

36. Please consider whether any of the MMs will need to be subject to Sustainability Appraisal or whether the Habitats Regulations Assessment may need to be updated or an addendum produced to take them into account. If so, these documents should be published alongside the MMs, in due course, for the assistance of consultees.

37. A copy of this letter should be placed on the examination website.

Yours sincerely,

Louise Nurser

INSPECTOR

APPENDIX – OUTLINE OF MAIN MODIFICATIONS REQUIRED (IN PLAN ORDER)

To ensure the plan is sound, the following main modifications are required. Numbers in brackets refer to the PM numbers in CD010a, the Council's suggested schedule of changes to the plan. Some editing and amendments will be required to these prior to formal consultation.

For the avoidance of doubt, all references to paragraph numbers relate to the plan as submitted.

MM1: Relationship with the JCS

Make explicit that all the policies within the GCP are non- strategic (119). Requires consequential amendments throughout the plan eg para 1.5, and Appendix 6 of the GCP.

MM2: review of JCS

1.4 set out up to date position.

MM3: Resource efficiency and waste reduction

As per (004).

MM4: Vision/ Key Principles

As per (005).

MM5: Development needs and strategy

Insert paras 4.1 to 4.3, and 4.10- 4.16 after para 2.22.

Include reference to employment land and how it relates to the 192 ha identified within the JCS in SP1.

Amend the table at paragraph 4.10 as follows:

Strategic allocations (Tewkesbury Borough)	4331
Winnycroft Strategic allocation	620
Completed	5,070
Planning consents (commitments)	1769
Windfall allowance	512
Gloucester City Plan allocations	920
Other supply	92
TOTAL	13,314

Insert, 'at least' before 14,359 homes in first bullet point.

Set out how much employment land Gloucester City is required to provide over the JCS period.

Delete para. 4.13

Add new paragraph making explicit, notwithstanding the on-going review of the JCS, that the Council has a positive approach to bringing forward additional development consistent with the spatial strategy and policies of the JCS.

MM6: Housing

Delete last sentence of para 3.1.1

Add additional paragraph reiterating the positive approach to be taken by the Council in providing housing within the administrative boundary of Gloucester, in addition to the sites which are allocated to bring forward housing. (159)

Reference the housing requirement of at least 14,359 dwellings, as set out in Policy SP1 of the JCS and make explicit that the 7,772 urban capacity figure derived from the JCS is not a cap. (161)

Reference new appendices to update pages 109- 110 of the JCS to include an updated trajectory and five year housing land calculation. This should be based on Ex 11, other than the removal of the following allocated sites from the 5 year housing land supply: SA10 Former Fleece Hotel and Longsmith Street Car park (loss of 25 dwellings); SA16 Land off Lower Eastgate Street (loss of 15 dwellings) and SA18 Jordan's Brook House (loss of 10 dwellings). (76)

Table 2 should read as follows:

Small sites- 278 consisting of ((3 x 64) + 86))

Large sites- 1856

Large deliverable sites on the brownfield register- 92

City Plan allocations- 500

Strategic allocations in Tewkesbury Borough/ Gloucester City attributed to Gloucester 2,083

TOTAL 4809 units

Table 3 should read as follows:

Row k 4809

Row l 100%

Row m 5.00

Include table setting out 5 year housing supply for travelling showpeople.

Reference supportive approach to the provision of pitches and plots for gypsy and travellers and travelling showpeople. (160)

Include reference to the needs of gypsies and travellers, and travelling showpeople within paragraph 3.1.3.

MM7: Policy A1- Effective and efficient use of land and buildings

Insert housing into title.

Rephrase first line to be positively worded: 'Development for housing will be permitted where it makes effective and efficient use of land of buildings and: ...'.

Delete the word 'amenities' in the second bullet point and replace with 'living conditions', or similar.

Add a criterion to ensure that the development results in good living conditions for those occupying the development. (120)

Delete reference to 'saturation of intensified properties' within the policy and the supporting text.

MM8: New policy

Insert standalone Houses in Multiple Occupancy policy.

MM9: Policy A2- Affordable housing

Delete the policy and supporting text. (121)

Consequential amendment to Policy A5- delete text beginning, 'Where development falls...', underneath criterion 4).

MM10: Policy A4- Student accommodation

Amend criterion 1) to broaden policy to include students who attend block courses (121) and insert 'to the educational establishment' within criterion 4). (122)

MM11: Policy A5- Specialist housing

Delete 'Development proposals must be', and replace with 'Specialist housing will be permitted where...'.

Delete 'supported by a sustainable business model'.(126) Make consequential amendments to paragraphs 1.38 and 1.39.

Delete criterion 4) and provide criteria to determine whether a concentration of a particular form of specialist housing would lead to harm. (124)

MM12: Policy A6- Accessible and adaptable homes

Delete '50% of housing..' and replace with, '25% of housing...'.

Delete text after, 'wheelchair user dwellings'.

Include additional supporting text setting out the circumstances where category M4 (3) (2b) will be required. (129)

Set out within the supporting text the circumstances under which a specific site would be less suitable for M4(2) and M4(3) compliant dwellings. (10)

MM13: Policy A7- Self build and custom build homes

Remove reference to ,‘a minimum of 5% of the net developable area... as serviced plots’, and replace with, ‘5% of the serviced plots shall be offered.....’. (130)

Second paragraph insert, ‘or a shorter period if previously agreed with the Council’, after ‘a minimum of 12 months...’. Delete ‘a 12- month period’ and replace with ‘set marketing period’. (131)

MM14: Employment development, culture and tourism

Introduction- Insert text explaining that the JCS Update Note provided an indicative availability of land for offices, research & development, light and general industrial, storage and distribution of 7 ha.

Amend paragraph 3.3.3 to delete the allocations which have already been permitted and are being developed, or which are to be deleted.

MM15: Policy B1- Employment and skills plans

Split policy to reflect the difference between the construction and the operational stage of the development.

Remove second paragraph from policy text and include within supporting text. Include reference to the Construction Industry Training Board. (12)

MM16: Policy B2- Safeguarding employment sites and buildings

Remove reference to ‘B Class’ from the policy and supporting text. Replace with, ‘offices, research & development, light industrial, general industrial, storage and distribution’.

Replace ‘non- B class use’ with ‘other uses’.

Delete ‘and’ after criterion a) replace with ‘or’ and insert new criterion b) ‘Alternative local employment facilities of an equivalent standard can be provided without adversely impacting on the operation of the existing business and its accessibility to existing employees; and..’.

MM17: Policy B3- New employment development and intensification and improvements to existing employment land.

Remove reference to 'B Class' from the policy and supporting text.
Replace with, 'offices, research & development, light industrial, general industrial, storage and distribution'.

Add additional text to criterion 3) and additional criterion 6). (14)

Delete, 'for example...'. (173)

Last paragraph, delete reference for 'non- B class uses' and replace with 'limited development outside these uses will be supported where...' Delete 'for B class uses'. (110a)

MM18: Policy B4- Development within and adjacent to Gloucester Docks and Canal.

Delete criterion 2. Replace with text as per (16a).

Criterion 3) delete 'environmental'.

Add additional text as per (17 & 18).

MM19: Policy B6- Protection of Public Houses

As per (174).

MM20: Policy C1- Active design and accessibility.

Remove reference to Active Design and Sport England. (132)

MM21: Policy C3- Public open space, playing fields and sports facilities

Amend as per (23.)

Remove reference to various strategies. (133)

MM22: Policy C4- Hot food takeaways

Criterion 2 as per (135). Delete reference to 'neighbouring' replace with 'nearby'.

Criterion 3 as per (25).

Criterion 5 as per (112).

Criterion 6 as per (136) make consequential amendment to supporting text.

Amend supporting text as per (26).

MM23: Policy C6- Cordon Sanitaire

Reference policy WCS11 of the Gloucestershire Waste Core Strategy 2012.

Include additional policy text to set out the circumstances under which planning permission would be granted for sensitive uses that could potentially constrain the operation of the Netheridge Sewage Works.

Delete second sentence in para 3.31 of supporting text.

Include supporting text which explains that circumstances may alter over the plan period, through the intensification of waste facilities at the site, or a reduction in odour nuisance, through the introduction of new technologies. Consequently, the cordon sanitaire should be treated as a trigger, to ensure that any development which could be adversely affected by odour is able to take place, without impacting on the operation of the Sewage works, or without resulting in unacceptable living conditions.

MM24: Policy C8- Changing Places Toilets

Amend policy as per (113) (138) and (139).

MM25: Policy D1- Historic Environment

Amend policy as per (36A).

MM26: Policy D2- Non-designated heritage assets

Amend policy as per (37A).

MM27: Policy D4- Shopfronts, shutters and signs

Move to Design section.

Amend policy as per (140-142). Ensure policy is written in a positive manner and is not overly prescriptive in terms of design or materials.

Amend supporting text to be more flexible.

MM28: Natural Environment- Introduction and context

As per (41), (42a).

MM29: Policy E1- Landscape character and sensitivity

Delete the policy.

MM30: Policy E2- Biodiversity and geodiversity

Delete reference to the Gloucestershire Local Nature Partnership.

MM31: Policy E3- Nature Recovery Area

Delete reference to the Gloucestershire Local Nature Partnership.

MM32: Policy E4- Trees, woodlands and hedgerows

Move E4 to end of chapter.

Amend as per (44, 45a, &146).

Delete last sentence in paragraph 4.5.8 of the supporting text.

Insert text referencing the requirement for developments to provide tree lined streets, as per the Council's response to the 2021 version of the Framework.

Remove last sentence of penultimate paragraph and reference within supporting text.

MM33: Policy E5- Green Infrastructure: Building with Nature

Reword policy to ensure that the objective of the policy is that green infrastructure is designed to meet established recognisable standards including those within the National Design Guide.

Make consequential amendments to the supporting text.

As per (46 & 114).

MM34: Policy E6- Flooding, sustainable drainage and wastewater

As per (147, 49a, 50, 51, 52, 53, & 54).

MM35: Policy E7- Renewable energy potential of the River Severn and canal

As per (55).

MM36: Policy F1- Materials and finishes

Amend as per (149 and 150).

MM37: Policy F2- Landscape and Planting

Amend as per (149 and 150).

Amend paragraphs 3.6.7 and 3.6.8 to be less prescriptive.

MM38: Policy F3- Community Safety

Amend as per (60 and 61).

Amend as per 152 and insert 'cycle routes' after footpaths.

MM39: Policy F5- Open Plan Estates

Amend as per (62).

MM40: Policy F6- Nationally Described Space Standards

Insert (or any future successor) into policy.

Reference exceptions where development would be acceptable where it does not meet the standards.

Require reference to transitional arrangements within supporting text.

MM41: Introduction to Chapter G: Sustainable living, transport and infrastructure

Insert as per (116) except, delete text after 'Waste Minimisation Statement' in new para 3.7.7 and delete text in new para 3.7.8, 'A proposals demonstrations....(and future iterations).

Amend fourth bullet point to delete reference with 'Building with Nature'.

Delete all of para 3.7.9 after, 'Energy Strategy 2019'. Insert reference to 'The Gloucestershire Climate Change Strategy 2019 and The Gloucester Climate Change Strategy and future iterations'.

MM42: Policy G1- Sustainable transport

Remove references to other documents that elevates them to development plan status (153) and include within supporting text if necessary.

Remove references that suggest that GCP is not the decision maker.

Rewrite policy to set out sustainable transport criteria against which future development proposals will be determined.

Include text as per (78).

MM43: Policy G2- Charging infrastructure for electric vehicles

Amend as per (69).

Amend as per (70) remove references to socket from policy.

Define what is meant by a rapid charger.

In second paragraph replace 'properties' with 'developments'. Delete text after 'strongly encouraged'.

Delete paragraph 3.7.15 of the supporting text.

MM44: Policy G3- Cycling

Amend as per (71 & 72 & 155).

Delete first part of second paragraph up to and including, 'other partners'.

Include additional policy text reflecting the requirement for all development to provide safe and secure access by cycle.

Ensure reference to Local Transport Plan is removed from policy text.

MM45: Policy G4- Walking

Remove reference to the County Council and other partners from the policy text.

Make explicit that pedestrians are the top of the road hierarchy for all developments.

MM46: Policy G6- Telecommunications infrastructure

Amend as per (117 and 157).

Remove reference to the County Council and other partners from the policy text.

MM47: Policy G8- Review mechanism

Amend as per (75).

MM48: Site allocations

Provide new policy within a table setting out the land use allocations of each individual site.

Cross reference with allocation statements providing further detail to inform the determination of any application. (162)

Clarify that the indicative capacity for residential development should not be treated as a ceiling. (161)

MM49: Site allocations- Housing

SA03 Former Prospect House, increase residential capacity to 60 dwellings. (83)

SA04 Former Wessex House, ditto to 40 dwellings. (164)

SA05 Land at Great Western sidings, ditto to 300 dwellings. (165)

SA18 Jordan's House, reduce residential capacity to 10 dwellings. (168)

MM50: Site allocations- Commitments

Delete SA08: King's Quarter.

Delete SA12 Land at Rea Lane, Hempsted.

MM51: Site allocations- Employment

Delete SA07: Lynton Fields, Land east of Waterwells Business Park.

Delete SA22: land adjacent to Secunda Way.

MM52: Site allocations- Mineral consultation areas

Include reference to MCA within accompanying site allocation statements as per (79, 80, 81, 84, 89, 95, 99, & 101).

MM53: Site allocations- Mineral consultation areas and land contamination

As per (90).

MM54: Site allocations- Mineral consultation areas and mitigation measures

As per (85, 96, & 100).

MM55: Site allocations- SA03 – Former Prospect House, 67 – 69 London Road

As per (82 & 163)

MM56: Site allocations- SA09 – Former Quayside House, Blackfriars

As per (88).

MM57: Site allocation- SA10 – Former Fleece Hotel and Longsmith Street Car park

As per (166).

MM58: Site allocation- SA11 – Land rear of St Oswalds Retail Park

As per (91).

MM59: Site allocation- SA15 – Land South West of Winnycroft Allocation

As per (94).

MM60: Site allocation- SA16 – Land off Lower Eastgate Street

Delete requirement for green roofs (167).

MM61: Site allocation- SA21 – Part of West Quay, The Docks

As per (169).

PLAN WIDE

MM62: Relationship with other development plans

Reference and set out how each policy relates to the relevant policy in the JCS (172), or the Gloucestershire Waste Core Strategy 2012, or the Gloucestershire Minerals Local Plan 2018- 2032 (GMLP).

MM63: Other guidance

Remove reference to external studies, guidance or policy documents from the policy text.

MM64: National Planning Policy Framework 2021

Update any references to the previous version of the National Planning Policy Framework to the 2021 revision.

MM65: Monitoring framework

As per (177).

MM66: Superseded policies

Clarify that all policies from the 1983 Gloucester Local Plan have been superseded by the GCP with the exception of the retail policies, as the GCP does not have any retail policies, relying on the policies of the JCS.

POLICIES MAP

The following amendments are necessary to the submitted Policies Map for the geographic application of the policies in the GCP to be justified and effective.

As per (105, 178, 179 and 180, apart from SA22 which is to be deleted).