

GLOUCESTER CITY PLAN
SUMMARY OF REPRESENTATIONS WITH CITY COUNCIL OFFICER RESPONSE

The following tables provide a summary of all comments made to each section / policy area, as well as any omission sites that were submitted through the Regulation 19 consultation.

The respondents are identified, their response to the key questions regarding soundness, legal compliance and the duty to cooperate and a summary of comments received. A brief response is then provided by City Council officers.

Where the officer response identifies a Proposed Change, this is set out in the Schedule of Proposed Changes (CD010a), Appendix 1 Tracked change Pre-Submission Gloucester City Plan (CD010b) and Appendix 2 Amended Gloucester City Plan Policies Map (CD010c).

GENERAL COMMENTS

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Representation summary	City Council response
General comment	8	Haresfield Parish Council	Not stated	Not stated	Not stated	Not stated	No comments.	-
General comment		Homes England	Yes	Yes	Yes	No	Homes England support Gloucester City Council's housing proposals within the City Plan and their proactive approach to supporting delivery.	Noted.
General comment		National Grid	Not stated	Not stated	Not stated	Not stated	No comments.	-
General comment		Office of Rail and Road	Not stated	Not stated	Yes	No	No comments.	-
General comment		Quedgeley Parish Council	Not stated	Not stated	Not stated	Not stated	Responded to the previous version of the plan.	-
General comment		Sport England	Yes	Yes	Yes	Yes	Provides evidence regarding the economic impact of sport.	Noted.
General comment		CPRE Gloucestershire	Yes	Yes	Yes	No	It would be helpful if each chapter were to begin with a cross-reference to the relevant sections of the JCS, in the form of: "This chapter should be read in conjunction with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, specifically ..." This is the approach adopted in the Cheltenham Borough Plan under encouragement from the examining inspector.	Noted
General comment		Highways England	Not stated	Not stated	Not stated	No	Replace 'Highways Agency' with 'Highways England'.	Agreed.

CONTEXT / VISION / KEY PRINCIPLES

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP?	Summary of comments	City Council response
Context	9	GCC Minerals & Waste	No	Yes	Yes	Yes	Suggested small revision to paragraph 2.16 relating to resource efficiency and waste reduction.	Agree this would help to strengthen this paragraph. Proposed change.
		Historic England	No	Not stated	Not stated	Yes	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.	Agree this would help to strengthen this section. Proposed change.
		University of Gloucestershire	Not stated	Not stated	Not stated	Not stated		
		Mr Robert Kingston	Yes	Yes	Yes	No	Incorrect % of younger people. Don't think 24.8% of people being under the age of 19 is the highest in an area nationally.	ONS mid-year estimates confirm Gloucester City has a higher of 0 – 19-year olds than all other districts in Gloucestershire, the County and the South West. Figure for Gloucester update to reflect most recent information. Proposed change.
		Rob Curtis	No	Yes	Yes	Yes		
		Environment Agency	No	Yes	Yes	Yes		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated	Incorrect link to Regeneration and Economic Development Strategy.	No link is provided. The document is available to download from the City Council's website.
		Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes		
Gloucestershire Wildlife Trust	Yes	Yes	Yes	No				

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
							<p>Suggest reference is added to the Gloucestershire Health and Wellbeing Strategy 2019 – 2030 as the latest evidence base.</p> <p>Appropriate to reference the Climate and Ecological Emergencies that have been declared both by National Government and the City Council. This provides valuable context as to the importance of natural environment policies in the Local Plan.</p>	<p>Agree. Proposed change.</p> <p>Agree it is important to note these declarations. Proposed change.</p>
Vision	5	Historic England	Yes	Not stated	Not stated	Yes	Support for the Vision.	Agree climate change could be strengthened. Proposed change.
		Woodland Trust	Yes	Yes	Yes	No	Support reference to climate change Paragraph 2.21 – but not sufficiently translated into Vision statement or key principles. Suggested wording provided.	
		Environment Agency	No	Yes	Yes	Yes	Support principle related to environmental assets.	
		Stagecoach West	Yes	Yes	Yes	No		
		Tritax Symmetry	No	Not stated	No	Yes	Request to better reflect economic growth aspirations.	
Key Principles	10	CPRE Gloucestershire	Yes	Yes	Yes	No	Climate change references welcomed but not sufficiently translated into the vision statement or key principles. It should be at the fore of the key principles.	Agree this would help to strengthen this section. Proposed change.
		GCC Minerals & Waste	No	Yes	Yes	Yes		Agree this would help to strengthen this key principle. Proposed change.
		Robert Hitchins Limited	No	Yes	Yes	Yes	Gloucestershire County Council as Minerals and Waste Planning Authority strongly encourage that a revision is made to Key Principle 1 so that efficient use of resources and waste reduction are brought under the umbrella of city's 'transformation' agenda.	
		Historic England	No	Not stated	Not stated	Yes		The Council consider that flooding is addressed at Principle 11 and that Policy E6 is very comprehensive.
		Kingsholm & Wotton Neighbourhood Partnership	No	Yes	Yes	No	Support mention of flood risk at Key Principle 11 but due to the importance of this within the plan area, a distinct principle for flood risk management would be preferable.	
		Environment Agency	No	Yes	Yes	Yes		The GCP allocates all suitable and deliverable sites in the City.
		Tritax Symmetry	No	Not stated	No	Yes	Objection on the basis that that the GCP does not support Key Principle 1 re. making best use of brownfield sites as it doesn't allocate Mill Place and Land North of Rudloe Drive.	
		Woodland Trust	Yes	Yes	Yes	Yes		Cross-boundary growth has been addressed through the adopted JCS and is being further progressed through the JCS Review, working with Gloucestershire authorities under the duty to cooperate.
		Gloucestershire Lead Local Flood Authority	Yes	Yes	Yes	Yes		
		Highways England	Not stated	Not stated	Not stated	No	Suggest new key principle / key policy regarding the need for strategic growth to take place in neighbouring authorities in order that Gloucester can realise its economic growth aspirations.	
							The GCP lists 13 key principles. The GCP notes the importance of being consistent with the objectives and principles of the JCS. The GCP seeks to promote sustainable transport, laid out in Policy G1, and states that the policies in the JCS and the Gloucestershire Local Transport Plan will be used for development management matters and planning application decision making, which we support.	Noted.

A: HOUSING

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
A1: Effective and efficient use of land and buildings	7	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Overall, there is strong support for this policy, which seeks to ensure that the best possible use is made of developments sites, whilst respecting character, context and local amenity.	Policy SD8 'Historic Environment' of the Adopted JCS and policies D1 'Historic environment' and D2 'Non-designated heritage assets' provide the policy context for heritage assets and the plans should be read as a whole. Given the historic character of the city, it is not considered appropriate to include an arbitrary density requirement. Policy A1 seeks to deliver the most efficient use of sites consistent with context, character and protecting local amenity. The capacity of site allocations has been determined in accordance with this approach, identifying higher densities in appropriate locations. Criterion 1 requires developments to 'result in overall improvements to the built and natural environment'. Policy SD9 'Biodiversity and Geodiversity' of the Adopted JCS and several GCP policies under Section E 'Natural Environment' (particularly E2 'Biodiversity and geodiversity') sets out the policy framework for restoring/enhancing ecological networks and the plans should be read as whole. It is considered this issue is adequately addressed.
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		GCC Minerals & Waste	No	Yes	Yes	Yes	Request from Historic England to amend text to safeguard heritage assets.	
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Historic England	No	Yes	Yes	Yes		
		South Worcestershire Authorities	No	Yes	Yes	No	Request for the policy to set out minimum density standards.	
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		
						Request to strengthen paragraph 3.1.1 to commit to restoring and enhancing ecological networks through habitat creation.		
						Gloucestershire County Council as Minerals and Waste Planning Authority partly support policy and consider criterion 5 should be revised to ensure resource and infrastructure safeguarding is effectively considered.		
A2: Affordable housing	12	Pall Mall Estates Limited	No	Yes	Yes	No	General objection to what is perceived as an increase in the requirement for affordable housing from 20% to 25% from the development industry, albeit one representator supported the clarity the GCP policy provides and another supports the policy clause to prevent sub-division of sites to circumvent policy requirement.	Policy A2 builds on Policy SD11 of the JCS, which states that 'a minimum of 20% affordable housing should be delivered on development sites in
		The Trustees of Mrs C Ground	No	Not stated	Not stated	Yes		
		The South West HA Planning Consortium	No	Yes	Yes	No		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Objection to the inclusion of a 'strategic policy' matter in a district plan – this should be addressed through the JCS Review.	
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Home Builders Federation	No	Not stated	Not stated	Yes		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
		Robert Hitchins Limited	No	No	Not stated	Yes	<p>Concern regarding the impact the requirement will have on the viability of schemes and the way this is reflected in the Viability Appraisal. Request that the 'viability clause' in the supporting text is moved into the body of the policy.</p> <p>Policy should be amended to allow exceptions where dwellings are for people with specialist needs and allow off-site provision in exceptional circumstances.</p> <p>Occupation of affordable housing will be limited to people in need of affordable housing and shall be secured in perpetuity' is inconsistent with NPPF, only relevant to rural exception sites.</p> <p>Policy absent on preferred housing mix and densities for new residential schemes. Suggest setting a district-wide policy to provide certainty.</p>	<p>Gloucester City'. It provides clarity and certainty to developers regarding what is expected.</p> <p>The policy has been tested through the Viability Appraisal. The delivery of affordable housing remains a priority for the City Council and 25% is already under actual needs, which is 36%. It has been set at this level to strike a balance between the delivery of affordable housing and infrastructure, whilst maintaining viability. Where viability issues exist, these will be considered by the authority in light of the JCS 'viability clause', referenced in the supporting text to Policy A2.</p> <p>This is addressed through Policy A5 of the GCP and Adopted JCS Policy SD11. It is expected that affordable housing contributions are made where the development falls into Use Class C3 and Use Class C2.</p> <p>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. Proposed change.</p> <p>Housing mix is addressed at Policy SD10 of the JCS and the plans should be read as a whole. Policy SD10 of the Adopted JCS and Policy A1 of the GCP require developments to make the best possible use of land, consistent with local context and character.</p>
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated		
		Gloucester City Homes	No	Yes	Yes	Yes		
		Redcliffe Homes	No	No	No	Yes		
		Bowsall Developments Limited	No	Yes	Yes	Yes		
		Gladman Developments Limited	No	Not stated	Not stated	Yes		
A3: Estate regeneration	5	CPRE Gloucestershire	Yes	Yes	Yes	No	Overall support for policy.	<p>Achieving best possible densities is addressed by Adopted JCS Policy SD10 'Residential Development' and Policy A1 of the GCP. The plans should be read as whole.</p> <p>The policy sets out a positive framework for the delivery of estate regeneration. There are various mechanisms within the Adopted JCS and GCP to consider issues such as viability and other matters, which will need to be tested through planning applications and</p>
GCC Minerals & Waste	No	Yes	Yes	Yes	Yes	Suggest additional wording stating that opportunities should be taken to increase density where consistent with good design and enhancing neighbourhoods and communities.		
Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes	Yes			
Gloucester City Homes	No	Yes	Yes	Yes	Yes			
South Worcestershire Authorities	Yes	Yes	Yes	Yes		Gloucester City Homes feel that the complexities of regeneration schemes mean there needs to be a policy lever to relax some policy requirements where they would otherwise stand in the way of otherwise beneficial regeneration.		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
							Gloucestershire County Council as Minerals and Waste Planning Authority would support a revision to policy to ensure high quality household waste collection services are built in.	considered through the planning balance. It would not be right to water-down and introduce uncertainty to a policy that at its heart seeks to deliver a good quality living environment that meets the needs of current and future communities. The Adopted JCS, Waste Local Plan and Policy A1 of the GCP cover the matter. There are also concerns about the development of piecemeal estate regeneration and incompatible waste collection systems.
A4: Student accommodation	2	Hartpury University and College	Yes	Yes	Yes	Yes	Overall support for the policy approach from the further education establishments.	Agree that the changing nature of further education means that it should be possible for student accommodation to be used by those on part-time/short courses. It is important that during term time student accommodation is used for that purpose to not place additional pressure on other housing stock. The City Council is actively progressing conversations regarding the delivery of student accommodation with Further Education providers.
		University of Gloucestershire	Not stated	Not stated	Not stated	Not stated	Request for the policy to allow greater flexibility for the use of student accommodation for students in part-time/short courses, for the use of student accommodation for alternative uses during term time and for a wide range of uses. Concern future need will not be met, keen to discuss site opportunities within the ownership of the City Council.	
A5: Specialist housing	2	Pall Mall Estates Limited	No	Yes	Yes	No	The requirement for provision of a 'sustainable business model' should be removed from the policy as not justified or necessary. The information may be commercially sensitive, and the future occupier may not be known as the time of application. Object to requirement for contribution towards affordable housing where scheme falls into Use Class C3. Schemes are already providing a type of housing to meet a social need and should not be expected to provide affordable housing on top of this.	The City Council considers it is important that specialist accommodation meets the needs of local people, both in terms of design and delivering long-term secure homes. The latter being supported by the providers business model. The applicant can demonstrate the appropriateness of the provision both in the detail of their application and via the support of Commissioners. This element of the policy is consistent with Adopted JCS Policy SD12, criterion 2.
		Gladman Developments Limited	No	Not stated	Not stated	Yes		
A6: Accessible and adaptable housing	11	Pall Mall Estates Limited	No	Yes	Yes	No	The policy should be revised by adding the statement: 'unless robust evidence is submitted to justify a reduced level of provision.' The evidence does not support the need for the policy and the assumptions made within the	Agree it is appropriate to reflect circumstances where it isn't physically possible to meet the standard. Proposed change. The Council City has prepared evidence to support the policy position that is accurate, robust and proportionate –
		The Trustees of Mrs C Ground	No	Not stated	Not stated	Yes		
		The South West HA Planning Consortium	No	Yes	Yes	No		
		L&Q Estates	No	Yes	Yes	Yes		

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		Home Builders Federation	No	Not stated	Not stated	Yes	supporting Viability Assessment do not reflect the true cost of such optional standards.	see Housing Background Paper for further information. The City Council's consultant considers the assumptions made in the Viability Report to be sound.
		Robert Hitchins Limited	No	No	Not stated	Yes		
		Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes		
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated		
		Gloucester City Homes	No	Yes	Yes	Yes		
		Redcliffe Homes	No	No	No	Yes		
		Gladman Developments Limited	No	Not stated	Not stated	Yes		
A7: Self-build and custom build homes	8	The Trustees of Mrs C Ground	No	Not stated	Not stated	Yes	The evidence does not support the need for the policy. Concerns expressed regarding the deliverability of the policy which could lead to delays. Alternative approach suggested. Only changes one form of housing delivery to another without boosting housing supply. Policy should state not applicable for flatted development. Potential oversupply against minimal demand. Impact on viability - the Viability Appraisal assumes cost neutrality. Requirement for a % from all sites is not justified, instead the Council should seek to allocate specific sites solely for self/custom build. Dispute requirement for this policy; the requirement is for the Local Authority, not developers. Policy will impinge on the number and mix of housing delivered, including affordable homes, and will affect the viability of Matson and Podsmead. Could cause delays in return due to need to market plots.	National guidance recommends that local authorities develop policies in their Local Plan to deliver self-build and custom housebuilding. Gloucester City is taking this approach because many of the other options cited in guidance are not likely to be successful in terms of delivering sites against the numbers on the register. The policy does aim to boost an element of supply (self/custom build) and allow people the opportunities in accordance with the Self and Custom Build Housing Act 2015. Flatted /apartment developments are excluded. There is a finite supply of land available for development in Gloucester City. The only opportunity to allocate a site solely for self/custom build would be on City Council land, which are either regeneration sites or in locations that are City Centre regeneration sites, or in central locations where high-density development is appropriate. Neither lend themselves to self/custom build development. The approach set out is considered an equitable way of addressing the Government's requirements.
		L&Q Estates	No	Yes	Yes	Yes		
		Home Builders Federation	No	Not stated	Not stated	Yes		
		Robert Hitchins Limited	No	No	Not stated	Yes		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated		
		Gloucester City Homes	No	Yes	Yes	Yes		
		Gladman Developments Limited	No	Not stated	Not stated	Yes		
A8: Static caravan sites	0	No comments received.	-	-	-	-	No comments	No response.
A9: Extensions to existing dwellings	0	No comments received.	-	-	-	-	No comments	No response.
A10: Annexes to existing dwellings	0	No comments received.	-	-	-	-	No comments	No response.

B: EMPLOYMENT DEVELOPMENT, CULTURE AND TOURISM

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP?	Summary of comments	City Council response
B: Employment development, culture and tourism	1	Tritax Symmetry	No	Not stated	No	Yes	Suggest paragraph 3.2.2 is amended to demonstrate how Gloucester City and Stroud District are working together to address the strategic employment need of Gloucester and the wider Gloucester region. Suggested wording provided.	This is a matter that is being progressed through the JCS Review.
B1: Employment and skills plans	3	Home Builders Federation	No	Not stated	Not stated	Yes	Support from Gloucestershire County Council Public Health and the Home Builders Federation (HBF).	Agree this would help strengthen the supporting text. Proposed change. The policy is clear that an ESP will be proportionate to the scale of the proposal. Costs will be minimal to the developer but create a substantial added value to the local workforce and economy. The policy is supported by the Home Builders Federation, subject to some amendments and these are identified as proposed changes.
		Robert Hitchins Limited	No	Yes	Yes	Yes	The HBF request some changes to support the policy's effectiveness – for example 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.	
		Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes	Policy creates a further cost to developers, which may affect viability and place an additional burden on small and medium sized housebuilders. The applicant may also not be the developer, and there may be a disconnect.	
B2: Safeguarding employment sites and buildings	7	CPRE Gloucestershire	Yes	Yes	Yes	No	Waste management infrastructure / facilities should be afforded at least the same safeguarding provisions as B-class employment.	Agree it would be helpful to clarify this point. Proposed change. This needs to be considered in light of the new Use Classes Order, which came into force in September 2020. The Council needs to balance housing needs and land/sites to meet employment needs. The policy has caveats and built in flexibility. The length of time for marketing, and the evidence required to justify the loss of employment land will depend on the nature of the site in question. This needs to be considered in light of the new Use Classes Order, which came into force on 1 September 2020.
		GCC Minerals & Waste	No	Yes	Yes	Yes	Amend the policy to allow non Class B employment generating uses on unallocated sites currently in Class B use as per the Core Strategy approach outlined in paragraph 4.1.3 and to also enable residential development on small employment sites where adequate residential amenity could be provided and this would assist in the regeneration of the local area.	
		Stuart Packford	No	Yes	Yes	Yes		
		Robert Hitchens Limited	No	Yes	Yes	Yes	Policy is inflexible and should not frustrate the long-term redevelopment / regeneration aspirations of the City. Promoting Mill Place, Land North of Rudloe Drive and Madleaze Industrial Estate. State length of time for marketing appraisal.	
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated		
		Sport England	Yes	Yes	Yes	Yes		
		Peel Group	No	Not stated	Not stated	Yes	Acknowledge that commercial sports (not retail) are a bona fide use of industrial and business parks.	
B3: New employment development and intensification and improvements to	5	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Strong support for the policy.	Agree this would help to strengthen the policy. Proposed change.
		CPRE Gloucestershire	Yes	Yes	Yes	No	Criterion 5 should make clear that unacceptable environmental impacts include those on ecological networks and biodiversity, where they cannot be appropriately mitigated or offset.	
		GCC Minerals & Waste	No	Yes	Yes	Yes		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
existing employment land		Stroud District Council	Not stated	Not stated	Not stated	Not stated	<p>Policy should encourage additional employment within or close to the city centre to support an increase in footfall.</p> <p>Policy could be strengthened by adding reference to active travel and prioritising these before vehicular access.</p> <p>Policy fails to incorporate matters of implementing waste minimalization and safeguarding the network of sustainable waste management infrastructure / facilities.</p>	<p>The policy is generic and supports new employment uses in any location in the city where the various criteria are met.</p> <p>Policies SD4 'Design requirements' and INF1 'Transport network' of the Adopted JCS, and policies C1 'Active design and accessibility', G1 'Sustainable Transport', G3 'Cycling' and G4 'Walking' provide the policy framework in relation to this matter. The plans should be read as a whole.</p> <p>To some extent these matters are covered in Waste Core Strategy policies, but the City Council some changes would strengthen the policy and supporting text. Proposed change.</p>
		Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes		
B4: Development within and adjacent to Gloucester Docks and Canal	8	Natural England	Yes	Yes	Yes	No	<p>Strong support for policy.</p> <p>Reference to public realm in policy is welcome – needs to go beyond maintenance to include securing improvements to public realm wherever possible.</p> <p>Suggested tweak to Habitats Regulations Appropriate Assessment. Also, a comment that the reference is unnecessary because of Policy E2 'Biodiversity and Geodiversity'.</p> <p>Wording of Part 5 is unclear regarding infrastructure and biodiversity net gain – suggest amendment to strengthen.</p> <p>Historic England suggest inclusion of a reference for proposals to take account of desirability of sustaining/enhancing historic significance.</p> <p>Canal and River Trust suggest inclusion of wording to safeguard existing waterside and to not impede the use of waterspaces by boats, craft and vessels.</p>	<p>This is addressed vis Policy F2 'Landscape and Planting' and Policy SD4 of the Adopted JCS. The plans should be read as a whole.</p> <p>This has been fact checked with Natural England and it is considered the term Habitats Regulations Assessment is acceptable.</p> <p>Agreed this is unclear. Proposed change.</p> <p>Agree this sentence would be improved with wording that better reflects the NPPF. Other historic environment matters are covered by policies D1 and D2 of the GCP, and SD8 of the Adopted JCS. Proposed change.</p> <p>Agree this suggestion would help to strengthen and provide clarity in the policy. Proposed change.</p>
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		
		Severn Trent	Yes	Yes	Yes	No		
		Historic England	No	Not stated	Not stated	Yes		
		Canal and River Trust	No	Yes	Yes	Yes		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
B5: Tourism and culture	2	Historic England	No	Not stated	Not stated	Yes	<p>The Theatres Trust supports the policy.</p> <p>Historic England encourages a similar policy that supports proposals that deliver the City Council's Heritage Strategy.</p>	Not relevant to this policy.
		Theatres Trust	Yes	Yes	Yes	Yes		
B6: Protection of public houses	1	Stroud District Council	Not stated	Not stated	Not stated	Not stated	Under criteria 3, it may be useful to clarify what physical distance is meant by 'within walking distance of the site'.	Noted.

C: HEALTHY COMMUNITIES

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
General comment	2	Historic England	No	Not stated	Not stated	Yes	Reflect the role heritage can have in promoting good health and wellbeing.	Agree this change would help strengthen to introductory text to this section. Proposed change.
		Cotswold District Council	Yes	Yes	Yes		Support all 'healthy communities' policies.	
C1: Active design and accessibility	5	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Some strong support for this policy.	<p>Agree this change would help strengthen the supporting text to this policy. Proposed change.</p> <p>The City Council places great weight on the delivery of good design, that supports communities in choosing active travel, which can be used safely, easily and with dignity by all members of the community.</p> <p>Agree point (1) should be updated. Proposed change.</p> <p>Points (2) and (3) relate to development matters and are not points that need clarifying within the GCP.</p>
		Robert Hitchins Limited	No	Yes	Yes	Yes	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.	
		Gloucestershire County Council - Public Health	Not stated	Not stated	Not stated			
		Gloucestershire County Council – Highways Development Management	Yes	Yes	Yes	Yes	Policy goes beyond requirements of national planning policy regarding design and is not justified. The standard to be met is the National Design Guide as referred to in the PPG and should be amended accordingly.	
		Sport England	Yes	Yes	Yes	No	Request for minor changes to address factual inaccuracies/language: <ol style="list-style-type: none"> Ensure correct reference to Gloucestershire County Council's Manual for Streets; Ensure paragraphs 3.37 – 3.3.11 respond to paragraphs 108 – 111 of the NPPF; Paragraph 3.3.11 covers items that would be considered/addressed under the Equalities Act 2010 therefore question whether inclusion is necessary. 	
C2: Allotments	1	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Allotments can contribute to ecological networks and help deliver net gain - recommended that a principle of no-pesticide use is established to help tackle the ecological emergency.	This is not something that can be required through planning policy. Comment forwarded to the City Council's Environment Team.
C3: Public open space, playing fields and sports facilities	7	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Support for policy, including from Sport England. Loss of existing facilities should be opposed if it would have a significant determinantal impact on ecological networks. Provision of new facilities should seek to incorporate opportunities for ecological enhancement and biodiversity net gain.	<p>This is addressed by other policies in the GCP and Adopted JCS. The plans should be read as a whole. Furthermore, the City Council's updated Open Space Strategy has a focus on biodiversity net gain and environmental improvements.</p> <p>This would need to be considered as part of the planning balance.</p> <p>Agree the approach towards open spaces and playing fields/sports</p>
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Gloucester City Homes	No	Yes	Yes	Yes		
		Sport England	Yes	Yes	Yes	No	Policy should be extended to include environmental benefits where possible through appropriate landscape treatment, provision of green infrastructure and enhance biodiversity.	
		Gloucestershire Football Association	Yes	Yes	Yes	No		
		Gloucestershire Playing Fields Association	No	Yes	Yes	Yes	Policy could be improved with mention of the amenity benefits of well-designed SuDS.	
		Gloucestershire Lead Local Flood Authority	Yes	Yes	Yes	Yes	Policy has the potential to affect the viability of regenerating estates such as Matson and Podsmead, where the principle of development of public open space is fundamental to delivery. Greater flexibility required.	
					Criterion 1 does not accord with the NPPF re. open spaces and 'excess provision' and policy should be amended accordingly.			

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
								facilities would benefit from clarification. Proposed change.
C4: Hot food takeaways	4	GCC Minerals & Waste	No	Yes	Yes	Yes	Overall support, including from Gloucestershire County Council as Minerals and Waste Planning Authority and Severn Trent. 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 (safety is acceptable/unacceptable – capacity is severe). Welcome requirement for adequate provision for waste and disposal facilities but would benefit from being more prescriptive and better aligned with local policy ambitions for the future management of waste. Some suggestions have been made to strengthen the policy, for example updated obesity figures for children and to amended wording to better reflect NPPF terminology regarding highways impact.	Agree this change would help to better reflect NPPF Terminology. Proposed change. Agree changes will be made in the supporting text. Proposed change. Agree it would be helpful to include up-to-date obesity figures for children. Also, to amend text to better reflect NPPF terminology for highways impact. Proposed change.
		Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes		
		Gloucestershire County Council – Highways Development Management	Yes	Yes	Yes	Yes		
		Severn Trent	Yes	Yes	Yes	No		
C5: Air quality	6	The Woodland Trust	Yes	Yes	Yes	No	Strong support for this policy, including Gloucestershire County Council as Public Health lead in that it supports the delivery of the Gloucestershire Air Quality Strategy. Some suggestions have been made to strengthen the policy, for example mitigation of impact on trees in creating a physical buffer and referencing the impact of poor air quality on the natural environment. To be consistent with Policy B4, policy should reference the need for a Habitats Regulations Assessment in certain circumstances.	Agree it would be helpful to include reference to the important mitigating impact through trees. Proposed change. Agree this would be helpful in the interests of consistency and to reflect recent case law regarding the impact of air pollutions on internationally protected assets. Proposed change.
		Natural England	Yes	Yes	Yes	No		
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		
C6: Cordon sanitaire	18	GCC Minerals & Waste	No	Yes	Yes	Yes	Overall, there is strong support from the local community to retaining a Cordon Sanitaire and its aims and objectives but concerns regarding a perceived reduction in the extent of the boundary. In contrast, others support the perceived expansion. Gloucestershire County Council as Minerals and Waste Local Authority request the inclusion of text which safeguards the impact of new development adjacent to the Netheridge Sewage Treatment Works or the opportunity for future expansion. Objection from Gladman Developments Limited as to the evidence prepared to support the extent of the Cordon Sanitaire and the way in which the supporting text is framed, which is too restrictive.	Agreed this suggestion would help to strengthen the supporting text to this policy. Proposed change. The evidence to support the extent of the Cordon Sanitaire has been prepared by external specialists and is considered robust and fit for purpose.
		Severn Trent	Yes	Yes	Yes	No		
		Cllr Dawn Melvin	Yes	Yes	Yes	Yes		
		Gladman Developments Limited	No	Not stated	Not stated	Yes		
		Hempsted Residents Association	Not stated	Not stated	Not stated	Yes		
		Dennis Collins	Not stated	Not stated	Not stated	Not stated		
		M Flight	Yes	Yes	Yes	No		
		Robert Mills	No	Yes	Yes	Yes		
		Liz Thurlow	No	No	Yes	No		
		Mrs Christine Pullen	Yes	No	Yes	No		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
		Amelie and Stephanie McRae	Yes	Yes	Yes	Yes	Please note: Eight non duly made representations were also received to this policy, provided at the end of this representations summary document.	
		John Roderick	No	Yes	Yes	Yes		
		Steve Dyke and Anne Fisher	No	Not stated	Not stated	Yes		
		Westgate Ward Members	Not stated	Not stated	Not stated	Not stated		
		Alan & Brigid Lomax	Not stated	Not stated	Not stated	Not stated		
		Robert Wakefield	Not stated	Not stated	Not stated	Not stated		
		Stephanie Butler	Not stated	Not stated	Not stated	Not stated		
		Tina Dean	Not stated	Not stated	Not stated	Not stated		
C7: Fall prevention from taller buildings	1	Gloucestershire County Council – Public Health	Yes	Yes	Yes	Yes	Strong support from Gloucestershire County Council as Public Health as an evidence-based intervention that can help 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.	Agree suggestion would help strengthen supporting text. Proposed change.
C8: Changing places toilets	1	Sport England	Yes	Yes	Yes	No	Support for policy - recommend reference to Sport England guidance for sports buildings.	This is not considered necessary.

D: HISTORIC ENVIRONMENT

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
General	3	Gloucestershire County Council – Archaeology	Yes	Yes	Yes	Yes	Support for historic environment policies from Gloucestershire County Council Archaeology and Gloucester Civic Trust.	<p>The Heritage Strategy is described in the introductory section to Section D and delivery elements relevant to spatial planning have been included within the GCP. However, additional text can be added to explain better how the Heritage Strategy will be implemented. Proposed change.</p> <p>Agree the existence of Article 4 Directions, and commitment to review these as part of the Heritage Strategy would helpfully be referenced in introductory text. Proposed change.</p> <p>Agree it would be helpful to reference the HSHAZ in the supporting text. Proposed change.</p> <p>This has been replaced with the Heritage Strategy and accompanying background paper (effectively a detailed topic paper) and Townscape Character Appraisal.</p> <p>Whilst the documents have informed the preparation of the GCP, agree they could be better referenced. Proposed change.</p>
		Historic England	No	Yes	Yes	Yes	May be helpful for the GCP to set out and/or illustrate, succinctly, the projects and opportunities in the Heritage Strategy to deliver, enable, engage and support heritage conservation.	
		Gloucester Civic Trust	Not stated	Not stated	Not stated	Not stated	<p>Policies and supporting text could be improved with better referencing of Article 4 Directions and impact on the city's Heritage Strategy.</p> <p>The City Council has now been successful in achieving a High Street Heritage Action Zone (HSHAZ) for Westgate Street / Cathedral Quarter. As an important component of the GCP's positive strategy for the conservation of Gloucester's historic environment it should be included in accordance with NPPF paragraph 185.</p> <p>Under previous iterations of the GCP a background paper was prepared as evidence but is no longer present.</p> <p>The Council has produced an impressive Townscape Character Assessment and adopted a Public Realm Strategy. They could be better referenced.</p>	
D1: Historic environment	4	Pall Mall Estates Limited	No	Yes	Yes	No	Historic England welcomes this carefully considered and succinct policy.	<p>All comments in support welcomed.</p> <p>It is considered this issue is adequately addressed in the wording of the policies and supporting text.</p> <p>Agree this would better reflect the NPPF. Proposed change.</p> <p>The approach is considered consistent with the NPPF.</p>
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated	After bullet 6, to reflect the emphasis on the NPPF it may be helpful to include the following reference; 'Great weights will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance. Any harm will require clear and convincing justification.	
		Historic England	No	Yes	Yes	Yes	Point 3 refers to 'preservation' – 'sustain may be more appropriate and be in accordance with the NPPF terminology.	
		Gladman Developments Limited	No	Not stated	Not stated	Yes	Concerns that the policy is too restrictive and that it should reflect circumstances where proposals resulting in 'less than substantial harm' to the	

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
							significance of a designated heritage asset should be weighed against the public benefits.	
D2: Non-designated heritage assets	3	Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated	Support the use of the wording 'balanced assessment'.	The current wording has been carefully considered. The suggested wording is too succinct and potentially open to interpretation. Agreed. Since publication of the Pre-Submission GCP the City Council has made a formal commitment to progress a Local List. Proposed change. The approach is considered consistent with the NPPF
		Historic England	No	Yes	Yes	Yes	Historic England suggest minor wording changes to rationalise text and provide greater consistency with the NPPF.	
		Gladman Developments Limited	No	Not stated	Not stated	Yes	Historic England also encourage the City Council to include a commitment to preparing a Local List. Concern the policy is too restrictive and should allow for flexibility in accordance with the NPPF.	
D3: Recording and advancing understanding of heritage assets	0	No comments received.	-	-	-	-	No comments received.	No response.
D4: Shops, shutters and signs	1	British Sign & Graphic Association	No	No	Yes	Not stated	Object to the policy as currently wording, which appears to be unsupportive of certain types of signage. Policy is too subjective and unrealistic. The Shopfronts, Shutters and Signs SPD is probably unlawful in that it seeks to give development plan status to a document that hasn't been subject to public examination.	The policy reflects what is considered appropriate signage by the City Council. Signage that is sympathetic to its surrounding is considered acceptable. All comments to the SPD were duly considered and the correct process followed.
D5: Views of the Cathedral and historic places of worship	2	Persimmon Homes Severn Valley	No	Not stated	Not stated	No stated	Two opposing views have been submitted.	The identified view corridors are considered appropriate and proportionate.
		Historic England	No	Yes	Yes	Yes	Not all historic places of worship are going to have the same sensitivity as the cathedral. The specific locations should be stipulated, or this element removed. Consideration on other significant heritage concerns should not be overlooked.	

E: NATURAL ENVIRONMENT

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
General	5	Marine Management Organisation	Yes	No	No	No	Strong support for the natural environment policies.	Agreed. Proposed change. Agree this should be included – since the publication of the GCP the City Council has declared a climate change emergency. Proposed change. Agree this would be helpful in clarifying the importance of both green and blue infrastructure. Proposed change.
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes	This section needs to reference South West Marine Plan.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Suggest reference is made to the climate and ecological emergencies that have been declared by the national Government and City Council.	
		Environment Agency	No	Yes	Yes	Yes		
		The Woodland Trust	Yes	Yes	Yes	No	Paragraph 3.5.2 should refer to both green and blue infrastructure.	
E1: Landscape character and sensitivity	3	CPRE Gloucestershire	Yes	Yes	Yes	No	Support balanced approach set out in policy.	The Adopted JCS and GCP need to be read as a whole, which addresses this point. Hedgerows are an important part of the character of landscapes and to ecological network and should be retained if possible. The policy states ‘...hedgerows...which contribute to local landscape character should, where at all possible, be retained...’. It will be for the applicant to demonstrate whether retention is possible. The suggested approach would also conflict with Policy E4 ‘Trees, woodlands and hedgerows’ of the GCP.
		L&Q Estates	No	Yes	Yes	No	Policy should address new landscape features or cross-reference to Policy E4.	
		Gladman Developments Limited	No	Not stated	Not stated	Yes	Hedgerows are almost impossible to retain when masterplanning a site – suggest policy amended to give greater flexibility.	
E2: Biodiversity and geodiversity	10	The Woodland Trust	Yes	Yes	Yes	No	Overall, there is strong support for this policy, including from Natural England as statutory consultee. Strong support for linking net gain with strategic green infrastructure, the Nature Recovery Network and the opportunity to offset mitigation offsite. Policy clearly follows national planning policy but also the advice of Gloucestershire Local Nature Partnership. Change suggested: ‘Any adverse effect – <i>direct or indirect</i> – on the site’s integrity can be mitigated’. The supporting text should reference a mitigation hierarchy to sequentially address the effects of new development. Explanatory text missing at Asterix 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. Use of the word ‘must’ removes the exercise of planning judgement and is not sound. Replace with	The policy is clear in referring to ‘any effect’. It is not considered necessary to repeat the mitigation hierarchy in the GCP. Agreed - this is an omission. Proposed change. The use of the word ‘must’ give clarity to applicants as to what is expected of them.
		Natural England	Yes	Yes	Yes	No		
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Gloucestershire Lead Local Flood Authority	Yes	Yes	Yes	Yes		
Gladman Developments Limited	No	Not stated	Not stated	Yes				

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
							<p>'should'. Policy should be flexible enough to long term impact of biodiversity net gain.</p> <p>Policy could be improved with mention of associated benefits of biodiversity from SuDS.</p> <p>Important that long term impacts are considered when reviewing proposals for biodiversity net gain considering that many measures will need to mature beyond the build period. If off-site mitigation provides the best opportunity for biodiversity net gain, policy should be flexible enough to allow for this.</p>	<p>The benefits of SuDS are addressed through Policy INF2 'Flood Risk Management' of the Adopted JCS and Policy E6 'Flooding, sustainable drainage and wastewater'. The Plan should be read as whole.</p> <p>This is considered through the development management process. Offsite mitigation is accepted, where justified, through Policy E3 'Nature Recovery Area'.</p>
E3: Nature Recovery Area	6	The Woodland Trust	Yes	Yes	Yes	No	Strong support for policy as an opportunity to capture off-site mitigation.	<p>The policy currently states 'Development proposals within the NRA, or in an area ecologically related to it...' This is considered robust.</p> <p>The extent Nature Recovery Area in Gloucester City is identified on the GCP Policies Map.</p> <p>The target species list was supplied by the ecologist at Gloucestershire County Council. Furthermore, paragraph 3.5.15 of the supporting text states 'The priorities may be subject to change due to ongoing renewal of evidence and will be determined by the LNP'.</p>
		Natural England	Yes	Yes	Yes	No	CPRE suggest change to strengthen policy: 'Development proposals within the NRA, or in any area ecologically related to it...'	
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		
		Rob Curtis	No	Yes	Yes	No	Could not find Nature Recovery Area map.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Amend target species list.	
E4: Trees, woodlands and hedgerows	6	The Woodland Trust	Yes	Yes	Yes	No	Strong support for this policy.	<p>Agreed. Proposed change.</p> <p>The focus of this policy is on the protection and delivery of new trees, woodlands and hedgerows, but this will be clarified in the text. Proposed change.</p> <p>Agreed. Proposed change.</p> <p>Hedgerows are an important part of the character of landscapes and to ecological network and should be retained if possible. The policy states '...hedgerows...which contribute to local landscape character should, where at all possible, be retained...'. It will be for</p>
		Gloucestershire Orchard Trust	Yes	Yes	Yes	No	For ancient / veteran trees root protection buffers should be greater than standard buffers.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	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.	
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		L&Q Estates	No	Yes	Yes	No		
		Severn Trent	Yes	Yes	Yes	No	<p>Policy could be strengthened with 'All new planting should include measures for appropriate long-term maintenance.'</p> <p>See comment to E1. Suggest removal of word 'hedgerows' from first sentence of first paragraph of policy.</p>	

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
								the applicant to demonstrate whether retention is possible.
E5: Green infrastructure: Building with Nature	11	The Woodland Trust	Yes	Yes	Yes	No	Strong support for policy. GWT welcomes the policy commitment to delivering high quality GI through the Building with Nature benchmark. It is vital that this and reference to ecological networks is retained in the plan.	Agreed this minor change would be sensible. Proposed change. Agreed this minor change would Strengthen the policy. Proposed change. The standard is important in creating high quality places to live and supporting active lifestyles and connectivity with nature. Agreed. Proposed change. Agreed. Proposed change.
		Environment Agency	No	Yes	Yes	Yes		
		Natural England	Yes	Yes	Yes	No		
		CPRE Gloucestershire	Yes	Yes	Yes	No	Environment Agency recommended the policy be renamed 'Green/blue infrastructure' as the two are inextricably linked.	
		Robert Hitchins Limited	No	Yes	Yes	Yes	Lead Local Flood Authority recommend policy could be strengthened with reference to the JCS Green Infrastructure Strategy, or successor, and including reference to SuDS and working with natural processes.	
		Cotswold District Council	Yes	Yes	Yes	No		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated	No justification for adopting standards – policy should be amended to encourage rather than require.	
		Gloucestershire County Council - Public Health	Yes	Yes	Yes	Yes		
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
Gloucestershire Lead Local Flood Authority	Yes	Yes	Yes	Yes	Natural England are developing their own standard so could refer instead to 'equivalent standards'.			
						Incorrect reference included at paragraph 3.5.21 - should refer to 'JCS Green Infrastructure Strategy'. Proposed correctional change.		
E6: Flooding, sustainable drainage and wastewater	5	The Woodland Trust	Yes	Yes	Yes	No	Strong support for the policy, including the Environment Agency as statutory consultee, Lead Local Flood Authority as local authority and Severn Trent Water as local drainage provider.	All comments in support welcomed. Agree this would strengthen the policy and important to consider given the local flood risk environment in Gloucester. Proposed change. Agree this would strengthen this policy and important to consider given the local flood risk environment in Gloucester. Proposed change. Agreed this would strengthen the policy and important to consider given the local flood risk environment in Gloucester. Proposed change. The GCP signposts to the SuDS discharge hierarchy and it isn't considered necessary to repeat it here. The policy and supporting text are already very lengthy. The policy is comprehensive on SuDS, stating that 'All development proposals will be
		Environment Agency	No	Yes	Yes	Yes		
		Gloucestershire Lead Local Flood Authority	Yes	Yes	Yes	Yes	Environment Agency - strongly recommend final sentence is removed and replaced with wording to expand upon opportunities that may present themselves during plan lifetime.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Environment Agency - recommend additional sentence inserted after paragraph 3.5.27 regarding flood risk and the design and layout of sites	
		Severn Trent	Yes	Yes	Yes	No	Environment Agency - suggest strengthening wording of paragraph 3.5.37 – draft wording provided.	
						Lead Local Flood Authority - Outline SuDS discharge hierarchy and cross reference SuDS in a number of other policies.		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EIP?	Summary of comments	City Council response
							<p>Lead Local Flood Authority – Reference should be made in the supporting text to the benefits of upstream Natural Flood Management (NFM) and to the potential for contributions for the same at 3.5.45.</p> <p>Lead Local Flood Authority - Final sentence at 3.5.39 should add ‘...and because Land Drainage Consent may be required.</p>	<p><i>required to manage surface water through SuDS...</i>’ the Council consider that it is not necessary to specifically reference SuDS in several other policies. The Plans should be read as a whole.</p> <p>Agree this suggestion would strengthen the policy. Proposed change.</p> <p>Agree this suggestion would strengthen the policy. Proposed change.</p>
E7: Renewable energy potential of the River Severn and the canal	7	Marine Management Organisation	Yes	No	No	No	<p>Strong support for policy, including Natural England as statutory consultee.</p> <p>Any works to the River Severn or ship canal will have to take into account the Southwest Marine Plan – suggested wording provided.</p> <p>Policy should be amended to require consideration landscape and visual impacts from proposals</p> <p>Canal and River Trust name needs to be corrected.</p>	<p>Agreed. Proposed change.</p> <p>The policy framework for this is provided through the Adopted JCS and other policies in the GCP, which should be read as a whole.</p> <p>Agreed. Proposed change.</p>
		Natural England	Yes	Yes	Yes	No		
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Canal and River Trust	Yes	Yes	Yes	No		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		
E8: Development affecting Cotswold Beechwoods Special Area of Conservation	6	The Woodland Trust	Yes	Yes	Yes	No	<p>Strong support for policy, from including Natural England as statutory consultee.</p> <p>Objection on the basis that the impact of the quantum of development already has already been tested through JCS examination and any change should be addressed through JCS Review.</p> <p>Policy should stress protection must include ancient woods and ancient and veteran trees. Support strategic approach.</p> <p>Gloucestershire Wildlife Trust state that appropriate mitigation should refer to provision of ‘Suitable Alternative Natural Greenspace’ in partnership with other local authorities/stakeholders, which is key to reducing pressure on SAC.</p>	<p>The City Council as local planning authority is required to address the impact of new development on internationally protected sites. The approach set out builds on that already included in the adopted JCS. The City Council has worked in preparing this policy with Natural England as statutory consultee.</p> <p>This is addressed through Policy E4 ‘Trees, woodlands and hedgerows’ of the GCP. The plans should be read as whole.</p> <p>Agreed this suggestion would be sensible and strengthen the policy. Proposed change.</p>
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Natural England	Yes	Yes	Yes	Yes		
		CPRE Gloucestershire	Yes	Yes	Yes	No		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes		

F: DESIGN

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response																																																																												
F1: Materials and finishes	2	The Woodland Trust	Yes	Yes	Yes	No	Suggest policy amended to help steer decarbonisation of construction e.g. through use of local timber for frames. Encourage amendment to promote strategically important land-use matters such as resource efficiency and management of waste (linked with comment to key principles).	It would not be appropriate for the GCP to require use of local materials – there is no evidence that there are sufficient materials to support the delivery of the quantum of development in Gloucester City. Adopted JCS policy SD3 provides the current approach to sustainable design and construction. Agree this would help to strengthen the policy. Proposed change.																																																																												
		GCC Minerals and Waste	No	Yes	Yes	Yes			F2: Landscape and planting	7	The Woodland Trust	Yes	Yes	Yes	No	Policy could be expanded to require developers to procure trees with strong biosecurity measures or nurseries that quarantine to minimise the risk of disease spread	It is not considered reasonable to require developers to do this. However, additional supporting text could be added to encourage.	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Natural England	Yes	Yes	Yes	No	Policy should include greater consideration of ecological suitability of planting schemes – must create habitat that aligns with local ecological networks and natural regeneration should be used to create woodland habitat wherever feasible.	The policy states that ‘Where appropriate, the use of native species in planting schemes will be required.’ This is further expanded at paragraph 3.6.10 of the supporting text.	CPRE Gloucestershire	Yes	Yes	Yes	No	Robert Hitchins Limited	No	Yes	Yes	Yes	Outline planning permission allows for principle of development to be established with some matters being reserved for future consideration, including landscape. Policy should be amended to allow for this and replace ‘must’ with ‘should’. Suggest policy could include a requirement to seek an overall net gain for biodiversity where possible.	Noted. The use of this language makes clear to applicants what is expected of them. Policies E2 ‘Biodiversity and geodiversity’ and E3 ‘Nature Recovery Area’ and E4 ‘Trees, woodlands and hedgerows’ deal with net biodiversity gain. The plans should be read as whole.	Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes	Environment Agency	No	Yes	Yes	Yes	F3: Community safety	2	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Policy must acknowledge the potential detrimental impacts on wildlife from safety lighting. 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.	Agree this change would help to strengthen supporting text. Proposed change. Agree it would be helpful to clarify this point in supporting text. Proposed change.	Gloucestershire County Council – Highways Development Management	Yes	Yes	Yes	Yes	F4: Gulls	2	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Consideration should be given to providing allocated gull nesting sites to encourage breeding in areas where nuisance behaviours can be contained, and request for policy to be broadened to include feral pigeons, which can cause problems when buildings are designed poorly.	It would not be appropriate to include measures regarding pigeons, where the extent of nuisance is much smaller.	Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes	F5: Open plan estates	1	Gloucestershire Wildlife Trust	Yes	Yes
F2: Landscape and planting	7	The Woodland Trust	Yes	Yes	Yes	No	Policy could be expanded to require developers to procure trees with strong biosecurity measures or nurseries that quarantine to minimise the risk of disease spread	It is not considered reasonable to require developers to do this. However, additional supporting text could be added to encourage.																																																																												
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No					Natural England	Yes	Yes	Yes	No	Policy should include greater consideration of ecological suitability of planting schemes – must create habitat that aligns with local ecological networks and natural regeneration should be used to create woodland habitat wherever feasible.	The policy states that ‘Where appropriate, the use of native species in planting schemes will be required.’ This is further expanded at paragraph 3.6.10 of the supporting text.	CPRE Gloucestershire	Yes	Yes	Yes	No	Robert Hitchins Limited	No	Yes	Yes	Yes			Outline planning permission allows for principle of development to be established with some matters being reserved for future consideration, including landscape. Policy should be amended to allow for this and replace ‘must’ with ‘should’. Suggest policy could include a requirement to seek an overall net gain for biodiversity where possible.	Noted. The use of this language makes clear to applicants what is expected of them. Policies E2 ‘Biodiversity and geodiversity’ and E3 ‘Nature Recovery Area’ and E4 ‘Trees, woodlands and hedgerows’ deal with net biodiversity gain. The plans should be read as whole.	Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes	Environment Agency	No	Yes	Yes	Yes	F3: Community safety	2	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Policy must acknowledge the potential detrimental impacts on wildlife from safety lighting. 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.	Agree this change would help to strengthen supporting text. Proposed change. Agree it would be helpful to clarify this point in supporting text. Proposed change.	Gloucestershire County Council – Highways Development Management	Yes	Yes	Yes	Yes	F4: Gulls	2	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Consideration should be given to providing allocated gull nesting sites to encourage breeding in areas where nuisance behaviours can be contained, and request for policy to be broadened to include feral pigeons, which can cause problems when buildings are designed poorly.	It would not be appropriate to include measures regarding pigeons, where the extent of nuisance is much smaller.	Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes	F5: Open plan estates	1	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Enclosure of land must not degrade ecological networks. Whenever possible, enclosure should be	Agree this would strengthen the policy and supporting text. Proposed change.						
		Natural England	Yes	Yes	Yes	No	Policy should include greater consideration of ecological suitability of planting schemes – must create habitat that aligns with local ecological networks and natural regeneration should be used to create woodland habitat wherever feasible.	The policy states that ‘Where appropriate, the use of native species in planting schemes will be required.’ This is further expanded at paragraph 3.6.10 of the supporting text.																																																																												
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		Robert Hitchins Limited	No	Yes	Yes	Yes					Outline planning permission allows for principle of development to be established with some matters being reserved for future consideration, including landscape. Policy should be amended to allow for this and replace ‘must’ with ‘should’. Suggest policy could include a requirement to seek an overall net gain for biodiversity where possible.	Noted. The use of this language makes clear to applicants what is expected of them. Policies E2 ‘Biodiversity and geodiversity’ and E3 ‘Nature Recovery Area’ and E4 ‘Trees, woodlands and hedgerows’ deal with net biodiversity gain. The plans should be read as whole.																																																																								
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		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes	F5: Open plan estates	1			Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Enclosure of land must not degrade ecological networks. Whenever possible, enclosure should be	Agree this would strengthen the policy and supporting text. Proposed change.																																																																			
F5: Open plan estates	1	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Enclosure of land must not degrade ecological networks. Whenever possible, enclosure should be	Agree this would strengthen the policy and supporting text. Proposed change.																																																																												

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response	
							through hedgerows rather than non-permeable fencing and walling.		
F6: Nationally described space standards	10	Pall Mall Estates Limited	No	Yes	Yes	No	Policy supports the Gloucester City Integrated Locality Partnership priority to support improvements in the mental health and wellbeing of children and young people living within the City	<p>The Housing Background Paper (September 2019) sets out evidence demonstrating that 30% of homes sampled did not meet the national space standards (with a further 19% almost meeting the standard, but not quite). The reasons why adequate space within dwellings is important is set out at paragraph 3.6.25 of the supporting text to the policy.</p> <p>The CPVA (Sep'19) assumes no costs for the NDSS based on the presumption that the majority of dwellings are being built, on the whole, to the sizes that would be more than the minimum NDSS floorspace sizes.</p> <p>The City Council considers the delivery of homes to a minimum space standard to be important in providing good quality accommodation, that meets the needs to people/families and that supports good health and wellbeing.</p> <p>The GCP is a Development Plan Document and can include policies that address strategic issues in Gloucester City.</p>	
		The Trustees of Mrs C Ground	No	Not stated	Not stated	Yes			
		The South West HA Planning Consortium	No	Yes	Yes	No	No need to adopt standards. Housebuilders and specialist providers adopt relevant and appropriate standards in their developments. Innovative design solutions have been applied effectively. Market led innovation and flexibility is important.		
		Home Builders Federation	No	Not stated	Not stated	Yes			
		Robert Hitchins Limited	No	No	Not stated	Yes			
		Gloucestershire County Council - Public Health	Yes	Yes	Yes	Yes			
		Persimmon Homes Severn Valley	No	Not stated	Not stated				
		Gloucester City Homes	No	Yes	Yes	Yes			
		Kingsholm and Wotton Neighbourhood Partnership	No (but not on this point)	Yes	Yes	No			Evidence prepared to support policy does not demonstrably identify the need for space standards, or their impact on viability and housing supply. Minimum space standards will worsen affordability and undermine affordable housing delivery and housing supply.
		Gladman Developments Limited	No	Not stated	Not stated	Yes			
						Delete policy or include transitional arrangements.			
						Space standards is a strategic policy issue and should not be addressed through non-strategic policies in the GCP.			

G: SUSTAINABLE LIVING, TRANSPORT AND INFRASTRUCTURE

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
General	1	Gloucestershire County Council – Transport Planning	Yes	Yes	Yes	Yes	<p>Supports the draft Pre-submission Gloucester City Local Plan's (The City Plan)) robust and highly integrated treatment of transport matters at the strategic level. The City Plan displays a consummate understanding of the connections between transport, accessibility, land use planning, health and sustainable living. An important role of land use planning is to create transport mode shift opportunities, not just through site allocations but through ensuring fine grain layouts to new development which exploit opportunities to open up and connect new sites with adjacent land uses within the City. This sentiment is clearly expressed through this pre-submission draft. It is also reflected in the proposed (new) LTP Policy PD1.</p> <p>The emerging City Plan may wish to note that the Local Transport Plan (2nd Review) will be issued for consultation in January 2020 and there may be proposed policy amendments which will be of relevance to it.</p> <p>In terms of local transport links it may also wish to show the LCWIP identified strategic cycle route through the city which will invite funding opportunities for its delivery.</p>	Support welcomed.
G1: Sustainable transport	4	CPRE Gloucestershire	Yes	Yes	Yes	No	Support for policy and its commitments to the sustainable transport network. Policy is sufficiently clear to support transport related interventions.	<p>Agreed. Proposed change to clarify the purpose of the GCP Highways Assessment.</p> <p>Agreed. Proposed change.</p>
		Stagecoach West	Yes	Yes	Yes	Yes		
		Gloucestershire County Council – Highways Development Management	Yes	Yes	Yes	Yes	Paragraph 3.7.10 in inaccurate and should be updated to make clear what the GCP Highways Assessment is.	
		Highways England	Not stated	Not stated	Not stated	No	Support commitment to sustainable transport network – should be the first statement in the policy, not the last.	
G2: Charging infrastructure for electric vehicles	9	The Trustees of Mrs C Ground	No	Not stated	Not stated	Yes	Support for the policy from Sport England and CPRE.	<p>Agree it would be helpful to clarify this in the supporting text. Proposed change.</p> <p>The charging infrastructure requirement for commercial development should be for at least 10%, or more. Charging points for E-bikes in town centres should be required.</p> <p>Objection raised regarding how the policy cost has been considered in the Viability Appraisal in that it only includes 50% of dwellings but the</p> <p>The cost has been applied on the basis of the form of development that will be delivered at</p>
		CPRE Gloucestershire	Yes	Yes	Yes	No	Policy isn't clear whether the exception relates to all developments, or non-residential developments only.	
		L&Q Estates	No	Yes	Yes	No		
		Home Builders Federation	No	Not stated	Not stated	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated		
		Gloucestershire County Council – Highways Development Management	Yes	Yes	Yes	Yes		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
		Sport England	Yes	Yes	Yes	No	<p>policy applies to all. Viability appraisal only considers cost per dwelling of a charging point, not those associated within any upgrades to the electricity network necessary to ensure capacity. Some additional costs may be incurred where capacity improvements are required. It was also commented that there should be an exemption based on grid connection cost to ensure viability.</p> <p>Policy should be deleted as moving ahead of Government proposals.</p> <p>Policy cannot demand requirement as may not be technically feasible in every circumstance.</p> <p>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.</p>	<p>the different site allocations i.e. where there will be 'a garage or dedicated residential parking space within its curtilage'.</p> <p>The City Council is committed to addressing climate change. There are also air quality issues in the city and, again, the City Council is committed to addressing these as far as possible. One element of this is through new development.</p> <p>These circumstances are reflected in the supporting text.</p> <p>Agree it would be helpful to clarify the form of socket sought. See Statement of Common Ground with Gloucestershire County Council as Highways Authority. Proposed change.</p>
		Gladman Developments Limited	No	Not stated	Not stated	Yes		
G3: Cycling	3	CPRE Gloucestershire	Yes	Yes	Yes	No	<p>Policy needs to be supported by provision of facilities for the safe storage of cycles at the bus and rail stations.</p> <p>Policy/supporting text needs to reflect that the towpath isn't a dedicated cycle path and the needs of other users.</p> <p>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.</p>	<p>Gloucestershire County Council's Manual for Streets provides details on parking requirements for different uses.</p> <p>Agree it would be helpful to clarify this in the supporting text. Proposed change.</p> <p>Agree it would be helpful to clarify this in the supporting text. Proposed change.</p>
		Canal and River Trust	Yes	Yes	Yes	No		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
G4: Walking	1	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	<p>There is evidence that green walking routes are more likely to be used, plus contribute to enhancement of ecological networks – this should be considered as part of improvements.</p>	<p>Agree it would be helpful to clarify this in the supporting text. Proposed change.</p>
G5: Broadband connectivity	1	Home Builders Federation	No	Not stated	Not stated	Yes	<p>The delivery of broadband service connections are reliant on a third-party contractors over which a developer is unlikely to have any control.</p> <p>Policy should not impose onto developers connectivity requirements that go beyond the</p>	<p>The City Council is committed to delivering high quality broadband connectivity.</p>

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
							provision of infrastructure as set out in Building Regulations.	
G6: Telecommunications infrastructure	0	No comments received.	-	-	-	-	No comments received.	No response.
G7: Water efficiency	8	The Trustees of Mrs C Ground	No	Not stated	Not stated	Yes	The evidence does not support the need for the policy. It is therefore unjustified and does not accord with national planning policy.	The Council considers that the policy is justified, reasonable and in line with Defra and Severn Trent Water guidelines and recommendations. Requiring new homes in England to be built to 110 litres per person per day is possible under Part G of [Building] regulations and would result in no additional cost. Agree this would be a helpful addition. Proposed change.
		Gloucestershire Lead Local Flood Authority	Yes	Yes	Yes	Yes		
		L&Q Estates	No	Yes	Yes	No		
		SF Planning	No	Yes	Yes	Yes		
		Home Builders Federation	No	Not stated	Not stated	Yes	Provide a description of how efficiency will be achieved. Focus on rainwater usage as opposed to mains water. Reference the benefits of upstream Natural Flood Management (NFM). Mention the water quality benefits of SuDS.	
		Persimmon Homes Severn Valley	No	Not stated	Not stated	Not stated	The policy is new and has not been previously consulted upon prior to this round of consultation.	
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Severn Trent	Yes	Yes	Yes	No		
G8: Review mechanism	3	L&Q Estates	No	Yes	Yes	Yes	Concern regarding the identification of affordable housing delivery as a priority. In contrast, concern that the policy is too open ended and should be restricted to affordable housing only, if not deleted.	Agreed it is inappropriate for the supporting text to state that affordable housing will be priorities over other forms of infrastructure where a review mechanism is justified. Proposed change.
		Stagecoach West	Yes	Yes	Yes	Yes		
		Rob Curtis	No	No	Yes	No		

SITE ALLOCATIONS

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
General comments	8	Historic England	No	Yes	Yes	Yes	Overall support expressed for the allocation of the urban capacity.	<p>The GCP makes site allocations that represent the urban capacity of the city. The amount of extant and allocated employment land is greater than that identified as part of the JCS examination.</p> <p>See comments under omission sites.</p> <p>Retail matters are being progressed through the JCS Review.</p> <p>This issue was not raised by the education authority in discussions to inform the Infrastructure Delivery Plan.</p> <p>Opportunities for higher density developments have been made through allocations. These are sites within or in close proximity to the city centre boundary, which benefit from excellent 'walkability' and public transport connectivity. The capacity of other site allocations has been made in accordance with an urban 'density multiplier'. Policy A1 requires applicants to make the best of sites in terms of density and capacity.</p>
		South Worcestershire Authorities	No	Yes	Yes	Yes	Support for inclusion of site-specific requirement regarding biodiversity.	
		GFirst LEP	Not stated	Not stated	Not stated	No	Concern expressed by the G-First LEP that across the JCS there is a shortfall of employment sites to provide for the needs set out in the JCS.	
		Gloucestershire County Council (Education)	Not stated	Not stated	Not stated	Yes	Objection on the basis of a shortfall of sites to provide for housing need, linked with the submission of omission sites.	
		Gloucestershire County Council - Ecology	Yes	Yes	Yes	Yes	Objection on the basis of a shortfall of allocations to provide for retail floorspace needs in accordance with the adopted JCS.	
		Gloucestershire Lead Local Flood Authority	Yes	Yes	Yes	Yes	LLFA suggest that all proposed site allocation should have a section on flood risk and SuDs, not just those in flood zones.	
		Stroud District Council	Not stated	Not stated	Not stated	Not stated	Gloucestershire County Council as Local Education Authority suggest that all sites in Hempsted need to provide a new school. A new interim position statement regarding securing S106 contributions towards education needs was also submitted.	
		Peel Group	No	Not stated	Not stated	Yes	Apply minimum density standards to site allocations.	
SA01: Land at the Wheatridge	8	GCC Minerals & Waste	No	Yes	Yes	Yes	Support from Gloucestershire County Council as education authority for primary school allocation that should be safeguarded until clear plans are in place to address needs for additional school places arising from Matson regeneration. Further support from some respondents to the additional/alternative allocation for residential development.	<p>Concern regarding the suitability of the site and need for a primary school in this location.</p> <p>The site represents the only opportunity to provide a primary school in the catchment and closest to where the need may arise, as supported by Gloucestershire County Council as Local Education Authority.</p> <p>Agreed. Proposed change.</p>
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Gloucestershire County Council - Education	Yes	Yes	Yes	Yes		
		Mr & Mrs C Mapp	Not stated	Not stated	Not stated	Not stated		
		Mr Ian Warren	No	No	No	Yes		
		Peter Crawford	No	No	Yes	Yes		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Robert Hitchins Limited	No	Yes	Yes	Yes		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
							GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements. Question the deliverability of the site.	
SA02: Land at Barnwood Manor	6	GCC Minerals & Waste	No	Yes	Yes	Yes	Support for the allocation and mitigation measures identified in the policy. The Environment Agency noted that floodplain is identified but the GCP policies will allow the development to take place through appropriate layout. One objection based on the flood risk sequential test from the promoter of an omission site. GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements. Question the suitability and deliverability of the site.	All comments in support welcomed. As part of the evidence base, the City Council prepared a flood risk sequential test. Agreed. Proposed change. Please note: this site now has full planning permission – decision issued 20/03/2020.
		Custom Land Ltd	No	Yes	Yes	Yes		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Environment Agency	No	Yes	Yes	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes	Support for the allocation, including from the landowner and Kingsholm and Wotton Neighbourhood Partnership.	
SA03: Former Prospect House, 67 – 69 London Road	7	Pall Mall Estates Limited	No	Yes	Yes	No	Red line area on the policies map needs amendment. The allocation should be for 60 dwellings and not for 30. No justification for identified capacity – could accommodate more? Replace with a figure that reflects a more thorough and detailed assessment of the site. Requirement to improve public realm along London Road' should be revised from a requirement to an aspiration, 'where feasible' to reflect they may be outside applicants control and not hinder the redevelopment of the site. Historic environment – requirement to refer to HEA for site should be amended to allow consideration of more up-to-date evidence produced to support a planning application, which demonstrates asks of HEA are not justified. Requirement for green roofs/walls supported in principle, however flexibility is required where site constraints are demonstrated that mean they are not feasible or appropriate.	Agreed. Proposed change. Agree the stated approximate capacity is too low. Proposed change. It is not considered that improvements would hinder the redevelopment of the site. Disagree. More up to date evidence in support of a planning application can be considered alongside the HEA. The HEA is a material consideration. Disagree. There is likely to be some potential on the site to utilise green roofs and walls, with minimal cost and good environmental benefit.
		GCC Minerals & Waste	No	Yes	Yes	Yes		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Kingsholm and Wotton Neighbourhood Partnership	No	Yes	Yes	No		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Stagecoach West	Yes	Yes	Yes	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
							<p>To be effective in delivering housing that meets the needs of the city, the policy should be revised to refer to the potential for development to provide for specialist housing needs.</p> <p>GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements.</p> <p>Support allocation. However, object to policy requiring conversion (no justification) – should be demolition and better reflect the Conservation Area. Amend wording as such.</p> <p>Request for the Council to provide a development brief for the site – would support Key Principle 10. KWNP willing and able to help the Council produce.</p> <p>Object to provisions for biodiversity as likely to be ineffective in comparison to more appropriate measures. The policy should not contain anything that would discourage the development of the site. Delete.</p> <p>Question the deliverability of the site.</p>	<p>Disagree, but there is nothing to stop an application for specialist housing on the site. Agreed. This matter is covered in the SoCG with GCC Minerals & Waste.</p> <p>Agreed. Proposed change.</p> <p>Disagree. Conversion is a far better option environmentally. Note the policy states 'There is an expectation...' but it is not totally prescriptive.</p> <p>Noted.</p> <p>Not agreed. The provisions are small but appropriate. In the Council's view they would not discourage the development of the site.</p>
SA04: Former Wessex House, Great London Road	6	GCC Minerals & Waste	No	Yes	Yes	Yes	<p>Strong support for the allocation of the site for residential development and identified biodiversity measures.</p> <p>Development would need to consider impact on road network surrounding Gloucestershire Royal Hospital.</p> <p>GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements.</p> <p>Table 4.7 of GCP states provision of 20 dwellings but no dwellings shown at Appendix 2 of Housing Background Paper.</p>	<p>The GCP is supported by a Highways Assessment, which considers the impact of traffic generated from development and makes recommendations on interventions. In addition, a planning application would need to be supported with evidence addressing this matter in more detail.</p> <p>Agreed. Proposed change.</p> <p>Noted.</p>
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Gloucestershire Hospitals NHS Foundation Trust	Yes	Yes	Yes	Not stated		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Stagecoach West	Yes	Yes	Yes	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
SA05: Land at Great Western Road Sidings	8	GCC Minerals & Waste	No	Yes	Yes	Yes	<p>Strong support for the allocation of the site for residential development (including landowner) and identified biodiversity measures.</p> <p>Development would need to consider impact on road network surrounding Gloucestershire Royal Hospital.</p>	<p>The GCP is supported by a Highways Assessment, which considers the impact of traffic generated from development and makes recommendations on interventions. In addition, a planning application would need</p>
		Stroud District Council	Not stated	Not stated	Not stated	Not stated		
		Gloucestershire Hospitals NHS Foundation Trust	Yes	Yes	Yes	Not stated		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Network Rail	No stated	Not stated	Not stated	Not stated		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
		Stagecoach West	Yes	Yes	Yes	Yes	GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements. Question the suitability and deliverability of this site.	to be supported with evidence addressing this matter in more detail. Agreed. Proposed change.
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Custom Land Limited	No	Yes	Yes	Yes		
SA06: Blackbridge Sports and Community Hub	5	GCC Asset Management	Yes	Yes	Yes	Yes	Strong support for the allocation of the site as a sports and community hub.	All comments in support welcomed.
		Active Gloucestershire	Yes	Yes	Yes	No		
		Gloucestershire Football Association	Yes	Yes	Yes	No		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Stagecoach West	Yes	Yes	Yes	Yes		
SA07: Lynton Fields, Land East of Waterwells Business Park	6	Bowsall Developments Limited	No	Yes	Yes	Yes	Strong support for allocation from Stagecoach, support from GWT of identified biodiversity measures.	All comments in support welcomed.
		Mr Andrew Foster	No	Yes	Yes	Yes		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Object to employment allocation, should be residential. Haven't considered reasonable alternatives.	The Council consider that the best use of the site is for employment uses, when considering surrounding uses and the need for employment land in the city. This remains the last available site adjacent to the strategic employment site at Waterwells Business Park. Agreed. Propose change.
		Stagecoach West	Yes	Yes	Yes	Yes		
		GCC Minerals & Waste	No	Yes	Yes	Yes		
		Custom Land Limited	No	Yes	Yes	Yes		
							GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements. Question the suitability and deliverability of this site.	
SA08: King's Quarter	8	Rob Curtis	Yes	Yes	Yes	Yes	Strong support the mixed-use allocation and including high-density residential development.	Agreed. Proposed change. Please note: this site now has full planning permission – decision issued 04/03/2020.
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	GCC Waste and Minerals request additional wording regarding location within Minerals Consultation Area and subsequent requirements.	
		Stagecoach West	Yes	Yes	Yes	Yes		
		Environment Agency	No	Yes	Yes	Yes	EA express support and no outstanding issues.	
		GCC Minerals & Waste	No	Yes	Yes	Yes		
		Stroud District Council	Not stated	Not stated	Not stated	Not stated	Question the deliverability of the site.	
		Robert Hitchins Limited	No	Yes	Yes	Yes	The policy does not specific how much retail floorspace the allocation should deliver. Peel Centre promoted as an opportunity.	
		Peel Group	No	Not stated	Not stated	Yes		
	9	GCC Asset Management	Yes	Yes	Yes	Yes		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
SA09: Former Quayside House, Blackfriars		Stroud District Council	Not stated	Not stated	Not stated	Not stated	Strong support for the allocation, including the landowner Gloucestershire County Council and Stagecoach as the main local bus provider.	Agree an amendment would strengthen the policy. Proposed change. This isn't considered necessary. Note: Part of the allocation now has planning consent for employment uses and health care facilities.
		Gloucestershire Clinical Commissioning Group	Yes	Yes	Yes	Not stated	EA express concern regarding the viability of the site over its lifetime from a flood risk perspective and policy may require amendment to address concerns.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Stagecoach West	Yes	Yes	Yes	Yes	Part of the site now has planning permission and that boundary should be amended to reflect this.	
		Environment Agency	No	Yes	Yes	Yes		
		GCC Minerals & Waste	No	Yes	Yes	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes	Question the suitability and deliverability of the site.	
		Custom Land Limited	No	Yes	Yes	Yes		
		SA10: Former Fleece Hotel & Longsmith Street Car Park	7	Dowdeswell Estates	Yes	Yes	Yes	
Gloucestershire Wildlife Trust	Yes			Yes	Yes	No	GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements.	
Stagecoach West	Yes			Yes	Yes	Yes		
GCC Minerals & Waste	No			Yes	Yes	Yes	Question the deliverability of the site.	
Stroud District Council	Not stated			Not stated	Not stated	Not stated		
Robert Hitchins Limited	No			Yes	Yes	Yes		
Peel Group	No			Not stated	Not stated	Yes	The policy does not specific how much retail floorspace the allocation should deliver. Peel Centre promoted as an opportunity.	
SA11: Land rear of St Oswalds Retail Park	9	Stroud District Council	Not stated	Not stated	Not stated	Not stated	The Environment Agency noted minor impact from flooding and expressed concerns over the historic contamination / previous use as a landfill at this site. Development in this location will need to adopt specific drainage techniques to address the problems of previous contamination and land movement in the interests of protecting ground and surface water quality. Request policy changes.	Agree amendments would help strengthen the policy. Proposed change. Agreed. Proposed change.
		Environment Agency	No	Yes	Yes	Yes		
		Tesco PLC	No	No	Yes	Yes		
		Rob Curtis	Yes	Yes	Yes	Yes	GCC Minerals & Waste request additional wording regarding Minerals Consultation Area and land contamination/landfill.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Stagecoach West	Yes	Yes	Yes	Yes	One of the landowners objects on the basis that the site is not available and therefore not deliverable.	
		GCC Minerals & Waste	No	Yes	Yes	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Custom Land Limited	No	Yes	Yes	Yes	Question the deliverability of the site. Part of site may be required for place-making given large amount of housing already at St Oswalds.	
						Question the suitability and deliverability of this site.		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
SA12: Land at Rea Lane, Hempsted	7	Hempsted Residents Association	No	No	Not stated	Yes	Support from the developer for the allocation for residential development - request capacity identified as a 'minimum'. Objection from Hempsted Residents association – suitability of allocation not justified, doesn't address constraints or infrastructure needs. Objection also regarding extent of Cordon Sanitaire (site outside – see policy C6). GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements. An objection relating to the extent of the Netheridge Cordon Sanitaire Question the suitability and deliverability of this site. Planning application on site yet to be determined.	Identified capacity as an 'approximate' figure – it is not a limit. Policy A1 of the GCP seeks to ensure the best possible use of sites is made in terms of density and capacity. The site allocation informed by various site-specific evidence bases, including Highways Assessment, Strategic Flood Risk Assessment (Level 2) and Flood Risk Sequential Test. More widely, the City Council has prepared other evidence such as an Infrastructure Delivery Plan and Cordon Sanitaire assessment. The site is considered suitable and deliverable for the stated allocation. Agreed. Proposed change. The site is outside the proposed boundary of the Cordon Sanitaire. New evidence has been prepared to justify the extent of the boundary. Please note: this planning committee has resolved to grant planning permission, subject to S106.
		Redcliffe Homes	No	No	No	Yes		
		Mr Richard Davenport	No	Yes	Yes	No		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		GCC Minerals & Waste	No	Yes	Yes	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Custom Land Limited	No	Yes	Yes	Yes		
SA13: Former Colwell Youth and Community Centre	4	GCC Minerals & Waste	No	Yes	Yes	Yes	Support for the allocation for residential development and biodiversity measures identified in policy. Development would need to consider impact on road network surrounding Gloucestershire Royal Hospital. GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements, and presence of nearby safeguarded minerals and waste infrastructure. Question the deliverability of the site.	The GCP is supported by a Highways Assessment, which considers the impact of traffic generated from development and makes recommendations on interventions. In addition, a planning application would need to be supported with evidence addressing this matter in more detail. Agreed. Proposed change.
		Gloucestershire Hospitals NHS Foundation Trust	Yes	Yes	Yes	Not stated		
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
SA14: Land off New Dawn View	4	GCC Asset Management	Yes	Yes	Yes	Yes	Support for the allocation for residential development from the landowner. Support from GWT for the identified biodiversity measures in policy. Question the suitability and deliverability of this site.	All comments in support welcomed.
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
		Custom Land Limited	No	Yes	Yes	Yes		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
SA15: Land South West of Winnycroft Allocation	4	Environment Agency	No	Yes	Yes	Yes	Support for the allocation for residential development from the landowner.	Agree this would help strengthen the policy. Proposed change.
		Ash & Co (on behalf of landowner)	Yes	Yes	Yes	No	Support from GWT for the identified biodiversity measures in policy.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	EA note that an additional comment could be added to policy for site to contribute to ongoing SUD and Twyver flood mitigation scheme (City Council and EA).	
		Robert Hitchins Limited	No	Yes	Yes	Yes	Question the deliverability of the site.	
SA16: Land off Lower Eastgate Street	6	Charles Perkins	Yes	Yes	Yes	No	Support for the allocation of the site for residential development, including from the landowner and for biodiversity measures identified in policy.	Agreed. Proposed change.
		GCC Minerals & Waste	No	Yes	Yes	Yes	GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements.	
		Stroud District Council	Not stated	Not stated	Not stated	Not stated	EA comment regarding flood risk and access.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Question the deliverability of the site.	
		Environment Agency	No	Yes	Yes	Yes		
		Robert Hitchins Limited	No	Yes	Yes	Yes		
SA17: Land South of Triangle Park	3	Network Rail	Not stated	Not stated	Not stated	Not stated	Network Rail state the site is currently required for operational purposes but may become available later for employment development.	Timescales noted. Agreed. Proposed change. Agreed this change would help to strengthen this policy and supports the Council's aims regarding biodiversity. Proposed change.
		GCC Minerals & Waste	No	Yes	Yes	Yes	GCC Minerals & Waste request additional wording regarding location within Minerals Consultation Area and subsequent requirements, and presence of nearby safeguarded minerals and waste infrastructure.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	GWT support biodiversity measures identified in policy. Create 15m buffer between development and railway line.	
SA18: Jordan's Brook House	4	GCC Minerals & Waste	No	Yes	Yes	Yes	Allocation fully supported. Site expected to become available within the next two years following relocation of GCC services to new accommodation at Quayside House (Policy SA09).	Agreed. Proposed change.
		GCC Asset Management	Yes	Yes	Yes	Yes	Agree with key biodiversity features identified and recommendations for surveys and enhancements to ecological networks.	
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	Add additional text regarding Mineral Consultation Area and requirement to establish whether a Mineral Resource Assessment is necessary. Suggested working provided.	
		Robert Hitchins Limited	No	Yes	Yes	Yes	Question the deliverability of the site.	
SA19: Land off Myers Road	6	Gloucestershire Hospitals NHS Foundation Trust	Yes	Yes	Yes	Not stated		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
		Gloucestershire Wildlife Trust	Yes	Yes	Yes	No	<p>Support for allocation for residential development and identified biodiversity measures in policy.</p> <p>Development would need to consider impact on road network surrounding Gloucestershire Royal Hospital.</p> <p>GCC Waste and Minerals request additional wording regarding location within Minerals Consultation Area and subsequent requirements, and presence of nearby safeguarded minerals and waste infrastructure.</p> <p>Question the suitability and deliverability of this site.</p>	<p>The GCP is supported by a Highways Assessment, which considers the impact of traffic generated from development and makes recommendations on interventions. In addition, a planning application would need to be supported with evidence addressing this matter in more detail.</p> <p>Agreed. Proposed change.</p>
	GCC Minerals & Waste	No	Yes	Yes	Yes			
	Stroud District Council	Not stated	Not stated	Not stated	Not stated			
	Robert Hitchins Limited	No	Yes	Yes	Yes			
	Custom Land Limited	No	Yes	Yes	Yes			
SA20: White City Community Facility	3	White City CIC	Yes	Yes	Yes	Yes	<p>White City CIC support allocation for community facility, being the only available site for such a facility in the White City community.</p> <p>GWT support biodiversity measures identified in policy.</p> <p>GCC Waste and Minerals request additional wording regarding location within Minerals Consultation Area and subsequent requirements.</p>	<p>Agreed. Proposed change.</p>
	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No			
	GCC Minerals & Waste	No	Yes	Yes	Yes			
SA21: Part of West Quay, The Docks	6	Canal & River Trust	No	Yes	Yes	Yes	<p>Support for mixed-use allocation from landowner, but request to increase residential capacity from stated 20 units.</p> <p>GWT support biodiversity measures identified in policy.</p> <p>EA state site lies with The Docks regeneration area therefore flood risk addressed.</p> <p>Question the suitability and deliverability of this site.</p> <p>The policy does not specify how much retail floorspace the allocation should deliver. Peel centre promoted as an opportunity.</p>	<p>20 units is indicative and is not a limit. Policy A1 of the GCP seeks to ensure the best possible use of sites is made in terms of density and capacity. Proposed change.</p> <p>Noted.</p>
	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No			
	Environment Agency	No	Yes	Yes	Yes			
	Robert Hitchins Limited	No	Yes	Yes	Yes			
	Peel Group	No	Not stated	Not stated	Yes			
	Custom Land Limited	No	Yes	Yes	Yes			
SA22: Land adjacent to Secunda Way Industrial Estate	3	Secunda Way Developments Limited	No	Yes	Yes	Yes	<p>Objection from the landowner, with a request to reconsider for residential development.</p> <p>GWR support biodiversity measures identified in policy.</p> <p>EA state that 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.</p>	<p>Agree highlighting this issue would help to strengthen the policy. Proposed change.</p>
	Environment Agency	No	Yes	Yes	Yes			
	Gloucestershire Wildlife Trust	Yes	Yes	Yes	No			

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
Omission sites	14	Landowner – Land east of St Oswalds Retail Park	No	Yes	Yes	Yes	Omission site: 'Land east of St Oswald's Retail Park'. Promoted as either a residential or commercial opportunity.	First submission - not included with SALA.
		L&Q Estates	No	Yes	Yes	Yes	Omission site: 'Land south of former Tuffley Farm'. Promoted by landowner as part of a wider residential/mixed use opportunity to the south east of Gloucester City, in both Gloucester City and Stroud District Council.	Will be considered as part of the JCS Review, working with Stroud District Council.
		Willsgrove Developments Ltd	No	No	Yes	Yes	Omission site: 'Former Oil Storage Depot'. Recently expired planning consent, now being promoted as an omission site through the GCP.	City Council officers currently supporting landowner to bring forward a viable residential development.
		Custom Land Limited	No	Yes	Yes	Yes	Site currently subject to planning application for residential development, now submitted as an omission site to the GCP.	Site granted outline planning permission for residential development.
		Newland Homes Ltd (T Sheppard)	No	Not stated	Not stated	Yes	Omission site: 'Land south of Grange Road'. Promoted by landowner as part of a wider residential/mixed use opportunity to the south east of Gloucester City, in Stroud District Council.	Located in the Stroud District Council administrative area. Will be considered as part of the JCS Review, working with Stroud District Council.
		Newland Homes Ltd (M Kurton)	No	Not stated	Not stated	Yes	Omission site: Land west of Newark Farm, Hempsted. Promoted as a residential opportunity.	Site located in Hempsted, not included within SALA. Site capacity is less than 5 units and would not therefore be allocated in the GCP.
		Tritax Symmetry	Not stated	Not stated	Not stated	Not stated	Omission site: 'Land off M5 Junction 12'. Promoted as a strategic employment opportunity to the south east of Gloucester City, in Stroud District.	Located in the Stroud District Council administrative area. Will be considered as part of the JCS Review, working with Stroud District Council.
		Robert Hitchens	No	Yes	Yes	Yes	Omission site: 'Mill Place'. Existing employment area promoted as a mixed-use redevelopment opportunity.	Site within the 'Canal Corridor' area, identified in the Council's 'Regeneration and Economic Growth Strategy' as a potential regeneration opportunity. City Council currently working to explore the opportunity.
		Robert Hitchens	No	Yes	Yes	Yes	Omission site: 'Land to North of Rudlow Drive'. Brownfield site with extant employment consent, now being promoted as a residential opportunity.	Current planning application.
		Peel Group	No	Not stated	Not stated	Yes	Omission site: 'Peel Centre'. Existing employment area promoted as an intensified retail opportunity, linked with Madleaze Industrial Estate to the south.	Site within the 'Canal Corridor' area, identified in the Council's 'Regeneration and Economic Growth Strategy' as a potential regeneration opportunity. City Council currently working to explore the opportunity.
		Peel Group	No	Not stated	Not stated	Yes	Omission site: 'Madleaze Industrial Estate'. Existing employment area promoted as a mixed-use redevelopment opportunity.	Site within the 'Canal Corridor' area, identified in the Council's 'Regeneration and Economic Growth Strategy' as a potential regeneration opportunity. City Council currently working to explore the opportunity.
		Sterling House Estates	Not stated	Not stated	Not stated	Yes	Omission site: 'Westgate Retail Park'. Existing and well occupied retail park with ancillary office and commercial uses. Promoted as a redevelopment opportunity for similar uses.	Site included within the SALA. Retail matters will be considered through the JCS Retail and city/town centre review.
Bromford	No	No	Yes	Yes	Omission site: 'Land East of Winnycroft Lane and North of Green Farm'. Promoted as a residential opportunity.	Site included within SALA and found unsuitable on the basis of impact on heritage, given presence of scheduled moat and impact on setting.		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
		Gladman Developments Limited	No	Not stated	Not stated	Yes	Omission site: 'Land off Hempsted Lane'. Promoted as a residential opportunity in Gloucester City.	Not in current SALA – re-submission. Site located within the extent of the Cordon Sanitaire around the Netheridge Sewage Treatment Works and consideration therefore needs to be given to likely odour nuisance. Current planning application.

MONITORING FRAMEWORK

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Representation summary	
Monitoring framework	3	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. Suggested health indicators to measure. Can provide data. Monitoring framework relates to housing delivery and the Council doesn't have enough housing sites to address housing needs. Promoting omission sites.	Agree this would be helpful to include. Proposed change. Agree this would be helpful to include. Proposed change.
		Gloucestershire County Council - Public Health	-	-	-	-		
		Robert Hitchens Limited	-	-	-	-		

STRATEGIC POLICIES & PROPOSALS IN THE JOINT CORE STRATEGY AND GLOUCESTER CITY PLAN

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Representation summary	
Various, including A2 and A7.	1	Robert Hitchens Limited	No	Yes	Yes	Yes	Question whether certain policies should be in the GCP as they are strategic in nature; should not come ahead of the JCS Review.	Strategic level policies can be contained within a Development Plan Document.

SUPERSEDED POLICIES

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Representation summary	City Council response
No comments	0	-						

POLICIES MAP

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Representation summary	City Council response
Policies map	2	Gloucestershire Highways	-	-	-	-	Include LCWIP strategic cycle routes	Currently in draft form and not considered appropriate to include.
Policies map		Pall Mall Estates	-	-	-	-	Amend boundary of allocation SA03: Former Prospect House, 67 – 69 London Road to reflect accurate landownerships.	Agreed. Amended on submission Policies Map.

NOT DULY MADE

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
C6: Cordon Sanitaire	8	Mike & Ruth Webb	Not stated	Not stated	Not stated	Not stated	Various comments regarding the extent of the Cordon Sanitaire and the impact of the Netheridge Sewage Treatment Works.	The evidence to support the extent of the Cordon Sanitaire has been prepared by external specialists and is considered robust and fit for purpose.
C6: Cordon Sanitaire		Mike Wigglesworth	Not stated	Not stated	Not stated	Not stated		
C6: Cordon Sanitaire		John & Florence Reigler	Not stated	Not stated	Not stated	Not stated		
C6: Cordon Sanitaire		Geraint Jones	Not stated	Not stated	Not stated	Not stated		
C6: Cordon Sanitaire		Jeremy Lane	Not stated	Not stated	Not stated	Not stated		

Policy / supporting text	No.	Respondents	Sound	Legally compliant	Duty to Cooperate	Attend EiP	Summary of comments	City Council response
C6: Cordon Sanitaire		Diana Canning	Not stated	Not stated	Not stated	Not stated		
C6: Cordon Sanitaire		M Flight (additional response)	Not stated	Not stated	Not stated	Not stated		
C6: Cordon Sanitaire		Amelia & Stephanie McRae (additional response)	Not stated	Not stated	Not stated	Not stated		