

Appendix 1 Response Report

This response report is prepared in accordance with Town and Country Planning (Local Plan) (England) Regulations 2012 Part 6, section 18. This table provides a summary of all of the responses received and an indication of how these comments will be taken forward into the next iteration of the emerging City Plan Pre-Submission Draft. The full versions of the comments are available to view at any time at www.gloucester.gov.uk/cityplan.

Abbreviations:

AA - Appropriate Assessment

AQMA – Air Quality Management Area

CP - City Plan

CPO – Compulsory Purchase Order

DTC – Duty to Cooperate

HMO – House in Multiple Occupation

HRA – Habitats Regulations Assessment

JCS – Joint Core Strategy

LPA – Local Planning Authority

NPPF – National Planning Policy Framework

SA – Sustainability Appraisal

SHMA – Strategic Housing Market

SPD – Supplementary Planning Document

THI – Townscape Heritage Initiative

WFD - Water Framework Directive

1.0 Introduction and overview – Comments received	Officer Response
Make more of the docks, canal and river by talking about the important role they play in the city. Recommend reference to the policy advice “Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System” published by the TCPA and Canal and River Trust.	CP will refer to the policy note suggested and will further incorporate the importance of waterways in the next draft of the plan.
Unsure about the inclusion of a Key Diagram and question what it adds to the document.	A key diagram is a requirement of the planning regulations and paragraph 157 of the NPPF.
Include cycle paths on the policy map.	Noted. Consideration to be given to this point. The map should reflect the policies of the CP.

2.0 Planning positively for the future of Gloucester – Comments received	Officer Response
The plan seeks to create a Gloucester in which I would be happy to live.	Noted.
Carry out early ecological investigations regarding the nature conservation value of brownfield sites.	Phase 1 Habitat Surveys will be undertaken across all proposed allocations at the appropriate time of year for surveying.
Support Key Principle 9 but want it to refer to connecting green assets to improve green infrastructure.	Noted. Change to be incorporated where appropriate.
Principle 12 should include reference to the provision of multi-functional green infrastructure.	Noted. Change to be incorporated where appropriate.
Generally support the Key Vision and Key Principles they dovetail comfortably with the JCS and will help to deliver the wider social, economic and environmental aims of the National Planning Policy Framework.	Noted.
Concerned that the Vision is a list of assumptions and not connected to the overarching vision chosen by residents.	Noted. The CP vision includes the wording of the vision chosen by our residents through the ‘City Vision’ process to create a ‘flourishing, modern and ambitious City.’
Support the vision especially the reference to ensuring health and wellbeing is a key consideration in all planning decisions.	Noted.
Suggested rewording of vision to include reference to green infrastructure. "New development will be built to the highest possible standard of design and multi-functional green infrastructure provision and will be focussed on protecting the quality and local distinctiveness of the City”	Noted. Change to be incorporated where appropriate.
Suggest include ‘woods and trees’, rather than just trees, in the CP vision and in Key Principle 9 and 14.	Noted. Change to be incorporated and widened to include woods, orchards and hedgerows where appropriate.
Welcome the recognition of the role of the city’s past in the economic well-being of its future.	Noted.
Key Principle 11 should be the highest priority for the City (tackling poverty and deprivation).	Noted.

3.0 Development management policies – Summary of Comments		Response
General comments	There are general concerns over the large number of policies and that some of the policies unnecessarily repeat content of the JCS.	Noted. It is not the intention of the CP to duplicate the policies included in the JCS. Further editing will be undertaken to ensure that CP is as concise as possible whilst remaining effective in providing for the City's local needs through sustainable development.
	More explanation of the relationship between the JCS policies and the CP policies and the order in which they should be applied needed.	Noted. We will look again at how we have described the relationship between the JCS and City Plan and make improvements where necessary.
	There is concern that the policies vary considerably both in the level of detail, and in their articulation; too many platitudes and vague statements. Policies should provide the framework against which developments are assessed. They need to be helpful, give clear guidance or specify requirements so that everyone using them is clear about how they should be applied. They do not provide land owners, developer or communities with a clear indication of what will or will not be permitted as required by NPPF para 154. It was also suggested that all of the policies should be checked and worded to be positive "yes unless" rather than "thou shall not" type policies and articulated more consistently.	Noted. We will look again at the structure of the policies and amend where appropriate to provide consistency and meet the requirements of NPPF paragraph 154.
	Suggested that if the policies have been deliberately written as they have it might be more helpful to categorise them as for information (you may like to know ...), guidance (it would be good if you did ...) or mandatory requirements (you must do this ...)	Noted. We will look again at the structure of the policies and amend where appropriate.
	Clear and consistent application and definitions of terms such as major development, large scale residential schemes, large scale developments, major applications, and new major development schemes required.	Noted. Further work will be undertaken to provide clear and consistent definitions throughout the CP.
	Amend the title "Key City Plan principles met" to read "Key City Plan principles addressed" as the principles will not be met until the end of the plan period.	Noted. Change to be incorporated.
A: Housing	It has been suggested that there needs to be a positive policy with regard to the site allocations, supply, deliver and trajectory to provide certainty for the allocations.	Noted. Further consideration to be given to anchoring the site allocations into an actionable policy.
	More information requested on how the residual housing requirement from the JCS will be planned for and distributed through the allocations.	Noted. More information will be provided.
	The anticipated windfall allowance is too high and that we should allocate more sites rather than relying on windfalls.	Noted. The anticipated windfall allowance is in line with the agreed JCS methodology. The LPA are doing all it can do identify and allocate as many suitable, available and achievable sites as it can to meet the housing need.

3.0 Development management policies – Summary of Comments	Response
<p>The draft plan identifies approx. 1000 dwelling shortage of the minimum target expressed in the JCS. You would like further clarification as to why Gloucester is not providing for the minimum 14,359 as you believe this shortfall makes the plan unsound.</p>	<p>The shortage is identified in the JCS Housing Implementation Strategy (HIS). The latest version with appendices and associated documents is available via the link below. http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx</p> <p>Through the JCS Examination Hearing Sessions on the responses to the Proposed Modifications (which commenced on 11th July) the Inspector will come to a view as to the acceptability of Gloucester’s shortage and the actions (over the full plan period) to meet the targets set on the basis of need.</p>
<p>The CP identifies some 23 site allocations at this stage, which it reports cumulatively will contribute to a total of 1,937 dwellings (Table 1). The site allocations set out in Table 2 of the Draft City Plan identifies only 1,010 dwellings. This is a significant shortfall upon that declared in Table 1. It is noted that Table 2 identifies site SA16 would deliver in the order of 50 dwellings. This would appear to be an error and should have referred to 400 dwellings. Assuming the figure of 400 dwellings for SA16 is correct then this results in current site allocations rising to 1,360.</p>	<p>There is a typographical error in Table 2 (City Plan Pages 81 & 82) as the respondent has correctly pointed out. SA16 Greater Blackfriars should be 400 dwellings. This brings the total in this table to 1,360. The 1,937 figure in Table 1 (City Plan Page 79) has an asterisk against it and a full explanation is given as to the reduction from 1,937 to 1,360; the main reason being that a number of large sites that were potential allocations recently got planning permission and so are now recorded as commitments in the trajectory. This process and all the figures are fully explained on pages 13 to 16 of the City Plan Topic Paper 3: Development Needs & Site Allocations.</p>
<p>The supporting refers to a number of ‘allocations’ which currently contribute to the total of 1,937 dwellings, but that are likely in the near future to be ‘reclassified’ as commitments due to planning permissions being granted.</p>	<p>Any potential allocations that are granted planning permission before the pre-submission draft of the CP will be amended to ‘allocations’. Regardless of the sites official status it will still be counted as providing towards need and supply.</p>
<p>As the council can not demonstrate a Sedgefield 5 year Housing Land Supply on adoption of the new local plan then the policies of the JCS and the CP would be considered out of date as per para 49 of the NPPF which undermines positive and effective plan making.</p>	<p>The City Plan will not proceed to adoption until the adoption of the JCS. Strategic allocations / urban extensions in the JCS in Tewkesbury Borough, but providing for Gloucester’s need will ensure that the Council will be able to demonstrate a 5 Year Housing</p>

3.0 Development management policies – Summary of Comments	Response
	Land Supply.
You feel that the City Plan should supply more sites and more flexibility in order to meet the delivery test of the emerging Housing White Paper.	<p>Noted. The CP is providing as many sites as possible. All suitable, available and achievable sites have been included.</p> <p>A ‘call for sites’ was held as part of the latest round of public consultation. Sites that have been submitted will be test through the SALA process and incorporated where appropriate. We invite land owners to submit sites to the CP process at any time.</p> <p>Given the physical constraints to the city’s boundary Gloucester has a fairly limited number of sites available. The council continues to work collaboratively with its neighbours to ensure Gloucester’s housing need can be achieved in surrounding areas.</p>
Policies A4 and A5 follow different approaches to policy writing and should be made consistent.	Noted. Change to be incorporated.
The relevant National Planning Policy Framework paragraphs should also include: Paragraphs 38 and 39, Chapter 6: Delivering a wide choice of high quality homes, and Chapter 7: Requiring good design.	Noted. Change to be incorporated.
The Council should clearly set out the approach to affordable housing in the next version of the Draft Plan, which should be consistent with the significant evidence base and the approach taken in the JCS which specifies a requirement for 20% affordable housing in Gloucester.	Noted. The approach to affordable housing will be consistent with the JCS and SHMA and will reflect locally evidenced need.
Given that the Council’s policies towards the delivery of affordable housing will be established in the emerging JCS, it is inappropriate for this to be repeated in the CP.	Noted. The CP housing policies will not repeat those stated in the JCS but rather demonstrate how the JCS policies will be applied locally.
Consider policy for houses in multiple occupation – it needs properly managing.	<p>Noted. HMOs are licenced by the Council. More information can be found at http://www.gloucester.gov.uk/resident/housing/housing-standards-and-conditions/Pages/Multiple-Occupancy-Homes.aspx HMOs are difficult to manage in planning terms as it is possible under Permitted Development to create a HMO for up to 6 residents without the requiring the benefit of housing.</p>

3.0 Development management policies – Summary of Comments		Response
	Concern regarding the need to address affordable housing needs – everyone should be able to have a decent home that they can afford to live in.	Noted.
A1: Use of upper floors for residential	This policy uses the phrase “Critical Mass” this term has a specific meaning. It seems to only appear once in the whole document so it is assumed to be out of context.	Noted. Edit required.
A2: Regeneration of neighbourhoods	It was stated that neighbourhood regeneration may involve the development of greenfield sites but the policy is worded to suggest only brownfield redevelopment will be accepted. You would like us to further promote the use of the Active Design principles in this policy. The text under Policy A2 contains the following “Therefore it is important that the positive aspects of past housing developments are not lost and that any regeneration initiatives genuinely enhance the neighbourhoods involved” However this ‘important’ point is does not appear to form part of the policy points 1 - 7. We assume this policy only applies to Gloucester City Homes Estates and this needs to be clarified. Paragraph 4 is unclear with no explanation of how any schemes would ‘improve’ existing housing.	All comments are noted. More consideration will be given to the aims and deliverability of this policy. Whilst the council wishes to support the redevelopment of sub standard housing and increase housing supply, consideration also needs to be given to the loss of greenfield and open spaces and the wider implications of this policy. Piecemeal infilling is not considered a suitable alternative to a comprehensive masterplanned approach.
A5: Housing mix	Consideration needs to be given to the criteria of the NPPG in considering the optional standard for accessible and adaptable homes. The Council are required to provide a local assessment which justifies the inclusion of higher optional accessible/adaptable home standard, and confirm the relevant viability tests have been undertaken. You noted that the policy does not make any reference to viability as required by paragraph 173 of the NPPF. You were concerned that the policy is ambiguous as it does not set out the level of affordable housing provision or preferred housing mix the Council would like to see come forward on sites. The justification for the policy indicates a recommended tenure split for affordable housing should be 75% in favour of rented accommodation around 25% in favour of intermediate. However, this is based on outdated evidence. A more realistic and reasonable approach would be 50:50 between rented and intermediate. The policy should also clarify that ‘affordable rented’ tenure is appropriate as set out in the NPPF. This policy should be amended following further work being undertaken by the Council in order to confirm what level of affordable homes can viably be delivered within the district and also the most appropriate mix of homes to be provided. Our client’s view is that 10% affordable housing is deliverable on sites within the City. Any amended policy should, however, ensure that these requirements are subject to site viability in order that it can be considered to be in accordance with the NPPF. This policy should be deleted. It only repeats provision already contained in JCS Policy SD12, which is	Noted. Further evidence base will be collated as per the NPPF to justify the inclusion of any policy requiring a locally specific standard. Noted. Further work is being undertaken to assess the best way to implement the JCS policy while addressing specific housing needs in individual areas of the city. Noted. The policy explanation does explain that this was the findings of the 2010 SHMA. Obviously the latest SHMA will be used in the next iteration of the policy. A robust evidence base has been prepared for JCS which indicates a minimum 20% affordable housing provision for Gloucester city is possible with the potential for more depending upon individual site viability. Noted. Whilst we will look at the redrafting of this

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	in any event more detailed	policy, it is felt that there will be some requirement for a policy on this matter in order to demonstrate how policy SD12 will be applied locally.
	Ensure that the policies and definitions of affordable housing and products reflect the recent Government’s White Paper: Fixing our Broken Housing Market (Feb 2017).	Noted. Full consideration of the White Paper will be given in the next iteration of the plan. This will include mention of affordable housing products such as Starter Homes, and Rent to Buy.
	4,406 social rented homes were sold in the 2015/16 financial year and a projected nearly 250,000 social rented homes will be lost between 2012 and 2020. This is due to a combination of factors which directly correlate to the Government’s recent measures making the disposal of social housing easier. Of these social rented homes lost... 28% of such homes will be lost via the preserved and voluntary Right to Buy schemes.	Noted. The LPA recognises the national challenges however the LPA must act in accordance with the national agenda on these matters set out by central government.
A5: Housing mix	The Council should recognise the ever-increasing need for true affordable housing to meet the needs of the many, by taking a flexible approach to encouraging delivery of all tenures so that Housing Association Registered Providers can deliver even more housing of an affordable tenure. A fundamental requirement of the NPPF is the responsibility placed upon Local Planning Authorities to “boost significantly” the supply of market and affordable housing.	<p>Noted. The council recognises the challenges facing Registered Providers surrounding the delivery of truly affordable housing.</p> <p>The NPPF places a responsibility on LPAs to boost the supply of affordable housing yet also requires LPAs to ensure that sites are viable and provide a “competitive returns to a willing landowner and willing developer” paragraph 173. This is a national policy issue.</p> <p>The LPA will continue to do all that it can through plan making and application processing to negotiate and secure as much affordable housing as possible to meet the needs of the city.</p>
	Ambitiously plan to meet affordable housing need across both the City and the JCS area. Failure to do so will inevitably cause further deterioration in the delivery of affordable housing, placing many more families on ever-increasing housing waiting lists.	Further work will need to be undertaken to explore the affordable housing issues facing the City and the impacts this may have on housing waiting lists. The CP will need to provide a policy solution to any identified impacts on need that emerge from this work.
	There are many reasons why the delivery of affordable housing is likely to be affected due to continued changes to national housing policy, which include: Welfare Reforms, Rent Reductions, Right to Buy: As part of the Housing and Planning Act 2016, Planning Policy: As a result of the May 2016 Court of Appeal decision, the changes to the Planning Practice Guidance mean that affordable	The Local Planning Authority will continue to do all that it can to secure affordable homes that reflect the evidenced need of the area. However the LPA must act in accordance with the national housing

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	housing contributions on smaller sites are no longer required.	policies set out by central government.
	With regard to viability, many key regeneration sites in the City have extenuating site constraints, for instance flood remediation, archaeology, or contamination, and a site may not be viable or economically attractive for a developer to take forward to delivery if affordable housing is always required as part of the tenure mix of a scheme.	Noted. Viability will be considered in accordance with the NPPF and the guidance provided in the NPPG.
	Attention is drawn to the fact that the White Paper also urges Local authorities to deliver new homes by establishing local housing companies or entering into joint venture models that yield housing for sale or private rent as well as affordable housing.	Noted. Comment to be passed on to the Senior Management Team.
	Attention is drawn to the White Paper immediate requirement for local planning authorities to seek to ensure that a minimum of 10% of all homes on sites of 10 units or more (or 0.5ha) are affordable home ownership products.	Noted.
	Concern that the CP would be unsound if it took forward a policy that required the delivery of affordable housing 'in all new housing development' without being subject to viability considerations.	Noted. Wording to be amended to clarify viability will of course be considered on a site by site basis.
A7: Housing choices for older people and supported and special needs housing	The NPPG states that "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling" (ID 56-009-20150327).	Noted. Further evidence base to be produced on this matter.
	The Council's evidence should not be a generic commentary about an ageing population it should be specific to Gloucester city and fully evidenced.	Noted. Further evidence on the housing needs of older persons is being produced and will form part of the next iteration of the CP.
	The Council needs to confirm that any requirement for accessible and adaptable homes has been subject to appropriate viability testing.	Noted. Further evidence base will be collated as per the NPPF to justify the inclusion of any policy requiring a locally specific standard. This includes appropriate viability testing.
A8: Self build	To be comprehensive, the policy should also refer to custom build houses. We recognise Government Policy is to assess the need for self and custom build houses through an area based register, but we consider that registers need to be more than a simple list of names. They should: <ul style="list-style-type: none"> - Differentiate between self build and custom build; - Avoid people being able to register for more than one area which inflates demand; - Those on the register should be required to demonstrate they are genuinely able to progress and have the expertise to build a dwelling and/or to manage a build project and/or if a custom build scheme have a builder lined up and in addition have the necessary finance in place to proceed. All of this needs to be set out in the justification to the policy to ensure that any policy for self and custom build is implementable. 	Noted. Policy will be amended to include 'custom build'. The Council is maintaining a self build register inline with current government policy. There is no intention or resource to go beyond these requirements and maintain a register in the manner suggested.
B: Economic Development	Recognise that waterways can provide a catalyst for urban renaissance, regeneration and diversification. Suggested that policy should introduce enough flexibility to allow the development and improvement of waterway infrastructure to support of small and medium-sized enterprises and jobs in the craft manufacturing and service sectors and recognise that the canal is a non-footloose	Noted – Further work is being undertaken on the Economic Strategy.

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	asset which limits locational choice of related business.	
	Highlighted the contribution sport makes to the economy with a total direct economic value of £40.4m to the city with employment of 1,054 people. Plan should acknowledge D2 uses on a par with B class uses as employment - highlighting that there is usually more employment generated by a D2 use than a B8 use. You promote the use of employment sites for indoor sport.	Noted – Further work is being undertaken on the Economic Strategy.
	Exam 183 the JCS Employment Land Statement of Common Ground Summary (February 2016) provides details of those sites agreed to provide employment land supply at that point in time across the JCS area as agreed between the JCS Council's and the development industry. This document identified 13.43ha of land available at Kingsway Framework 5 for employment purposes, however no commentary is made in the document of the commercial attractiveness of the sites to the market and therefore no assessment is made of their deliverability for employment purposes within the JCS plan period.	Kingsway Framework 5 has extant planning permission for employment uses and thus there is a reasonable prospect of sites in this framework being used for that purpose.
	Opportunity requested to comment on the emerging employment evidence base when it is published.	Noted. Further employment evidence base will be made available as part of future consultations.
	The CP should also provide the opportunity for the review of historic employment commitments to ascertain their current suitability for employment development, especially in areas where new employment development would abut an existing or new residential development.	Noted. A review of historic employment commitments will be undertaken as part of the emerging evidence base through the employment monitoring.
	Relevant National Planning Policy Framework paragraphs should also include: Chapter 1, 2, 4, and 5.	Noted. Change to be incorporated.
	Relevant policies from the JCS should also include: SP1, SP2, SD3, SD4 and SD5.	Noted. Change to be incorporated.
B1: Employment and Skills Plan	The requirement for an Employment and Skills Plan for developments of more than 20 dwellings is considered to be excessive and unnecessary. Development of under 100 units are likely to have a relatively limited impact on local employment and skills and is unlikely to add anything to the process. There is also no explanation as to what such a document should include. Clearer guidance should be provided on the requirements for planning applications.	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	It is considered unreasonable that schemes of 20 or more dwellings should have to submit an Employment and Skills Plan as this places an undue burden and cost on potential small and medium sized builders as well as regional and national housebuilders who maybe seeking to deliver smaller sites.	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	While the tenor of the policy is welcome as it will improve skills and training it is considered that there is insufficient evidence published as part of the public consultation exercise to demonstrate that sites of 20 or more dwellings should have to provide an ESP	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	Rather than require yet another report we consider this requirement to be capable of being cooperated in to a Construction Employment Management Plan as an environmental benefit in reducing the need to travel. Also the justification for the policy needs to provide clear evidence for the definition of major development, which we note is different here compared to Policy F1 (20 or more units here, compared with more than 10 dwellings in Policy F1). It is unreasonable to require the	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.

3.0 Development management policies – Summary of Comments		Response
	employment and skills plan to include targets when the policy only specifies the need to identify ‘opportunities’ for local employment and it is not clear what action will be taken to implement the targets.	
B2: Existing key employment sites	The City has not published sufficient evidence with this consultation to demonstrate that the whole of Kingsway Framework 5 should be safeguarded for B Class employment purposes as required by this policy. The site has been marketed for a substantial period of time but there has been little market interest in delivering new B Class development at this site.	Noted. Further evidence will be provided as the evidence base and employment monitoring is complete. The CP will deliver the identified quantum of employment land as set out in the JCS in the most suitable, available and achievable locations.
	The final sentence of Policy B2 is also covered by Policy B4: Existing Employment Space – it is submitted therefore that the final sentence of the policy is not required as Policy B2 is titled ‘Existing key employment sites’ and not all employment sites in the City will be ‘Key’.	Noted. Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	The extent of Kingsway Framework 5 is not included on the Proposals Map.	Noted. The extent of the Framework 5 boundary will be included on the next iteration of the Proposals Map.
	The policy requires the addition of an exception which is included within NPPF paragraph 22 ‘where there is no reasonable prospect of a site being used for that purpose.’	Noted. Exception to be added in accordance with paragraph 22 of the NPPF.
B4: Existing employment space	This policy needs to better reflect paragraph 22 of the NPPF which states that; ‘Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.’ The retention of land for employment purposes needs to be held in balance with the fact that the City cannot meet its housing need requirements over the plan period.	Noted. Exception to be added in accordance with paragraph 22 of the NPPF. The CP will reflect the need of both housing and employment provision. Whilst we accept the need to increase housing supply, there is an identified employment need to provide for in order to create sustainable communities. Providing homes without providing for sufficient employment opportunities is not considered a sustainable solution. It is a balance made through an assessment of the appropriate evidence base.
	In order for the City to continue to regenerate and encourage inward investment it will be necessary for sites that once provided traditional manufacturing employment in the City, especially in relation to its role as an inland port, will need to be redeveloped to provide the employment accommodation that newly emerging sectors locating to or emerging within the City.	Noted. Comprehensive work has been undertaken as part of the JCS to assess and identify the changing employment sectors. This work forms part of the CP evidence base. Employment sites will be protected where they contribute to meeting the employment need.
	This policy should also acknowledge that in order to redevelop traditional old employment sites to provide new smaller scale units or alternative employment accommodation to meet current demand	Noted.

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	that mixed use development may be required in order to ensure that redevelopment and regeneration is viable	
	The policy contains a negative obligation ‘will not normally be permitted’. It should be redrafted to provide a positive obligation	Noted. Policy style to be amended.
	Some policies contain terminology that would benefit from clearer definition. For example, Policy B4 on existing employment space refers to clear evidence that the site is no longer viable and suitable for B class use.	Noted. Clarity to be provided.
C: Retail and City/Town Centres	Provide flexibility for new chandleries and marinas to support the canal function to be able to be located outside of the city centre.	Noted.
	Invest in the indoor market and other markets. The majority of residents in the City rely on markets not multinationals.	Noted. The Council is committed to retaining an indoor market within the city. Markets are important part of the vitality and viability of the city centre.
	Need for more better quality retailers and restaurants in the City Centre proper (not Gloucester Quays).	Noted. Regeneration of the city centre is a priority for the Council. The policy in the CP reflect this aim.
	More tree planting in city centre	Noted. Trees play an important role not only for green infrastructure and biodiversity, but also to health and wellbeing. Tree policies are dealt with in the Natural Environment section on the CP.
C1: Maintaining the vitality and viability of City, District and Local Centres	The JCS Inspector agreed that retail frontages and city centre boundaries, strategic retail allocations and Gloucester’s comparison goods market share, are all a matter for immediate review in the JCS and should not form part of the CP. The site allocations containing retail are over inflated and that the overall approach fundamentally fails to accord with the requirements of Paragraphs 23 and 156 of the NPPF.	Noted. The JCS Main Modifications set out what the immediate retail review is likely to cover. The floorspace figures identified at part of site allocations in the regeneration are indicative and will be considered further through the immediate review.
	Strongly agree with and share the concerns raised over the increasing competition facing the city centre from out-of-centre shopping and the poor linkages between some parts of the city centre. Several expressions of concern regarding the amount of development taking place at Gloucester Quays and the Peel Centre and the impact this is having on the City Centre. Strong view that the focus now needs to shift to the City Centre proper.	Noted. The regeneration of the city centre is a Key Principle of the CP. This includes improving key linkages and protecting the centre from inappropriate out-of-centre and out-of-town development.
	There is a need for a locally defined threshold for impact assessments.	Noted.
	Concerns was raised over the time it may take to complete the immediate review as part of the JCS process, and therefore the pressing need to ensure that any interim policies set at the district level are sufficiently robust to defend against harmful, speculative out of centre development which purports to be addressing the needs of the City ahead of JCS Policy SD3 being revisited.	Noted.
	Most of the issue listed are not presented as issues, see Economic Development key issues list on	Noted. The issues list will be edited where

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	page 28 which reads as proper issues list should.	appropriate and be consistent throughout the CP.
	The CP refers to the emerging Public Realm Strategy as a key relevant strategy. However it isn't clear from this section the role it will play in ensuring an attractive, vital and vibrant town centre characterised by its rich and delightful heritage cityscape.	Noted. Further information to be added to the CP on the Public Realm Strategy where appropriate.
	What role can the historic environment play in increasing the vitality and attractiveness of the city and town centres?	Noted. The historic environment has an important and significant role to play. Further work will be undertaken to ensure this role is reflected in the text for this chapter.
	Relevant National Planning Policy Framework paragraphs should also include: Chapters 1, 2, 5, 7, 8	Noted. Change to be incorporated.
	Relevant policies from the JCS should also include: SP1, SD2, SD4, SD5, INF1 and INF2	Noted. Change to be incorporated.
	The criteria for locally set thresholds for impact assessments need to accord with the test set out in paragraph 26 of the NPPF. 200sq.m is particularly low and the evidence to which the threshold is based is out of date. New evidence should be presented given the figure is significantly lower than the 2,500 sq.m set out in the NPPF.	Local impact thresholds are to be considered as part of the JCS immediate retail review.
C1: Maintainin g the vitality and viability of City, District and Local Centres	The low threshold of 200 sp.m may cause financial burden for small stores making them unviable contrary to paragraph 173 of the NPPF. Further evidence is required to justify this level.	Local impact thresholds are to be considered as part of the JCS immediate retail review.
	It was raised that there is no justification for the proposed threshold for requiring retail impact which is currently set at 2,500 sqm where proposals affect the City Centre. The NPPF threshold of 2,500 sqm is too high, particularly where city centres such as Gloucester are vulnerable and even a small out of centre scheme could have a disproportionate effect on vitality and viability of the centre. You would like us to assess where the current balance of unit sizes lies in each of the defined centres. A suitable threshold or thresholds can then be set which supports the spatial strategy for the Plan.	Local impact thresholds are to be considered as part of the JCS immediate retail review.
	Policy to also clarify that retail impact assessments will be applicable to change of use, Section 73 applications and variations to s106 agreements which may seek amendments to existing permissions which necessarily restrict the level and type of goods that can be sold.	Noted. This to be considered the JCS immediate retail review.
	You feel that the policy fails to reflect the key criteria within the NPPF for assessing proposals for main town centre uses in edge and out of centre locations. Specifically paragraphs 24 – 27.	Noted. The requirements of the NPPF will be addressed through a combination of the JCS immediate retail review and the Gloucester City Plan.
	No guidance is given as to what this impact assessment should address and indeed what the implications will be should an Applicant fail to demonstrate that there will be no impact on the relevant centre. There is also currently no requirement for Applicants to undertake a sequential assessment for main town centre uses as per the guidance set out at Para 24 of the NPPF (this only appears to apply to visitor attractions as part of Draft Policy C2).	This policy provision is set out through the Joint Core Strategy and will be considered further through the JCS immediate retail review.
	The policies in the plan do not match the policies drafted in the background topic paper.	Noted. The background topic paper was produced in advance of the draft CP and has evolved since the time the paper was written; therefore the policies

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		do not match. Further changes are expected as further evidence base is produced.
	We recommend this additional clause to promote culture and the use of vacant spaces. The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise key centre locations and the public realm.	Noted. The idea to use buildings in a temporary manner is generally supported. However this would not warrant a policy as in many cases a temporary use may not require planning permission. During the next edit we will look at how we can bring culture into the supporting text in a relevant way.
	Gloucester BID task groups alongside Gloucestershire County Council are presently running a feasibility study on improvements to lower Eastgate Street, similar to those at Kimbrose Triangle. This should be reflected in City Plan.	Noted. Any evidence generated or advancements made by the BID task group will be included where appropriate.
	There should be an ambition for the redevelopment/improvement of the Eastgate Centre within the plan lifetime. Whilst this may not be deliverable I think the council should be encouraging appropriate changes. In particular there should be schemes to improve the facades on Eastgate Street and Southgate Street - perhaps with a modern re-interpretation of the former Bell Hotel facade.	Noted. Unless the development of a site is deliverable it can not be included in the CP. Appropriate redevelopment which improves facades whilst positively responding to the local context will generally be supported by other policies.
	You feel that the policy appears to have been positively prepared and seeks to encourage new tourist related development in the city centre.	Noted.
C2: Visitor attractions	You wish to see tourists attractions clustered or co-located with existing facilities such as Gloucester Quays to capitalise on existing attractions and businesses.	Noted. Many of the city's tourist attractions are based on historic elements that would not be practical or desirable to relocate. Clustering attractions at the Quays would only profit businesses at the Quays and would not help in the overall aim of the CP to strengthen and regenerate the City Centre.
	Promote tourism by having a permanent sculpture trail around the city centre (the scrumpties were a huge success). Make the sculptures about famous Gloucester connections – Harry Potter, Beatrice Potter, Dick Whittington, Daleks etc. It will really help draw people around and tourists will want to photograph them all.	Noted. Idea passed to relevant Member, Tourist Information Centre and Culture Board.
C3: Overnight accommodation	The adopted City Council Strategy “Growing Gloucester’s Visitor Economy” updated the Hotels study done by the JCS and identified that there is a pressing need to build extra Hotels in the city centre Gloucester – especially in the full service sector. This has now been included in JCS reference documents. http://www.gloucester.gov.uk/council/Documents/Strategies,Plans%20and%20Policies/Growing_Gloucesters_Visitor_Economy.pdf Recommend – include reference to this strategy in City Plan and explicitly focus on opportunities to	Noted. The CP will be amended to reference this document. Specific allocation of hotel sites is considered restrictive to the market and may sterilise sites while hotels develop on other sites.

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	make land available CITY CENTRE for hotels to locate. Without development their will be barriers to growth in the visitor economy.	
	More 4 star hotels needed.	Noted.
C4: Major cultural venue	The Theatres Trust supports this policy. Culture and the creative industries play a key role in developing vibrant city centres, which are the economic and social heart of sustainable communities. Culture and cultural activity helps develop a sense of place and is what makes a centre unique and special. We support cultural led development and encourage Council to use this as a catalyst for wider regeneration. Cultural venues are important by supporting the local and visitor economy and by attracting people to these centres where other businesses then benefit from the flow on effects. We believe local plans should therefore support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities.	Noted.
	The Guildhall is a major cultural venue.	Noted. The Guildhall is an extremely important part of the cultural offer of the city. The CP is seeking to support a proposal for a much larger venue.
	The plan doesn't mention Blackfriars which is also a cultural venue for the city.	Noted. Amend CP to include reference to Blackfriars.
	The plan doesn't mention GL1 which holds most of the large scale cultural events for the city yet isn't funded properly to be able to do these events justice.	Noted. Amend CP to include reference to the programme of events held at GL1.
	The council says it wants another venue but it can't properly fund or look after the 2 other theatres in the city.	The Picturedome is privately owned and is not the responsibility of the council. The council own the freehold to Kingsbarton Theatre and are responsible for the fabric of the building. The theatre itself is run by a charity.
	The city really needs a flexible space for participatory arts, dance, theatre, music. No other local city has anything like this. A place to learn to perform and be a large space for viewing performances like dance, gymnastics and circus plus orchestral. With the flexibility to put on small music and theatre shows. Local producers like Checkers gym should be consulted, as well as dance schools, music and performance schools.	Noted. Comments will be passed onto the Cultural Board.
	But not another large venue for music as the city couldn't afford the upkeep of facility or technology that a building that size would need for the amount of use it would have.	Noted. Comment will be passed onto the Cultural Board.
	Development of a venue/arena/exhibition centre/ banqueting space needed.	Noted. Comment will be passed onto the Cultural Board.
D: Health and Wellbeing	You fully support policies to improve health and wellbeing and you encourage the use of waterways and towing paths for leisure, recreation and sporting activities as part of the 'natural health service', acting as 'blue gyms' and supporting physical and healthy outdoor activity;	Noted. More emphasis on this point to be added.
	You would like to see more commitment to the protection and provision of woods and trees in the health and wellbeing section given that they make a valuable contribution to social inclusion, health,	Noted. More emphasis around this point to be included in this chapter.

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and the environment.	
You welcome the bringing together of these policies under the Health and Wellbeing heading. However, you feel that by separating out green infrastructure features (Policy D2: Outdoor Space; Policy D4: Allotments; Policy D5: Open Space), and conversely to include a discrete green infrastructure section F: Natural Environment (F5: Green infrastructure), represents a missed opportunity to emphasise the role green infrastructure can play as a strategic framework for recognising and promoting the multi-functionality of each of these features and how they link together as a network.	Noted. Consideration will be given to the structure of these policies and perhaps the merging of the two chapters.
You welcome that pollution and contamination are included within this section of the Plan. However you consider the wording of policy D12 pollution could be improved to incorporate more of an enhancement stance, rather than being just about prevention. Furthermore it should state that development proposals should be accompanied by appropriate reports (i.e. assessments of potentially polluting aspects).	Noted. These reports are required as part of the validation checklist for planning applications. However reference to them could be made.
You welcome that policy D13 contamination includes protection of groundwater as well as human health.	Noted.
Please note that the Health & Wellbeing Strategy referred to in paragraph 1.7 is owned by the Gloucestershire Health & Wellbeing Board – made up of a range of health, social care and other partners – not the County Council.	Noted. Amendment required.
It may be helpful to include a definition of health inequalities in the Glossary to assist readers' understanding of this term. NICE defines this as: "Health inequalities are differences between people or groups due to social, geographical, biological or other factors. These differences have a huge impact, because they result in people who are worst off experiencing poorer health and shorter lives." (https://www.nice.org.uk/advice/lgb4/chapter/introduction)	Notes. Amendment required.
The County Council's Public Health team welcomes the strong focus on the health and wellbeing of Gloucester residents in the City Plan Vision and throughout draft City Plan and the identification of the role that planning can play in improving health and wellbeing and tackling health inequalities through development management policies.	Noted.
The focus on the key issues for Gloucester, including obesity, diabetes, suicide and substance misuse, is particularly welcomed. Paragraph 2.23 refers to the specific health and wellbeing issues for Gloucester City and the latest Public Health England health profile (2016) suggests the draft City Plan has identified issues which are supported by evidence - http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000081.pdf .	Noted.
References to both physical and mental health and wellbeing throughout the draft City Plan are also welcomed as they help to underpin the principle of parity of esteem, enshrined in law by the Health & Social Care Act 2012 (https://www.centreformentalhealth.org.uk/parity-of-esteem).	Noted. Reference to Health and Social Care Act to be referenced where appropriate.
The Public Health team welcomes the requirement for major applications to be supported by a health impact assessment (p42). However, it would be helpful to understand how the quality of these	Noted. Further work with our partners will be undertaken to establish a best practice methodology

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	assessments will be assured.	for the production and assessment of Health Impact Assessments.
	The role of the City Plan in tackling health inequalities could possibly be strengthened by identifying common areas, e.g. of lack of access to sport facilities and play areas (referenced in Paragraphs 2.25 and 2.27) and higher deprivation.	Noted. Further consideration to this point required.
	As well as the strong focus on specific health and wellbeing development management policies, the draft City Plan makes helpful connections to wider determinants of health in other policy sections, such as housing. For example, Policy A7 (Housing choice for older people and supported and special needs housing) should support independence for older people and those with additional needs, helping to improve quality of life and wellbeing and reduce pressure on statutory health and social care services. Policy H1 (Sustainable transport) presents opportunities to improve health and wellbeing through active modes of transport, as well as reducing congestion and improve the environment. However, the connections with health improvement could possibly be strengthened in other policy areas, such as F. Natural Environment (specifically F5. Green Infrastructure).	Noted. Further consideration will be given to the bringing together the various threads of health and wellbeing and presenting them in the clearest way possible.
	Healthcare facilities are essential infrastructure . When planning for new settlements, the Council should ensure that they work with NHS commissioners (Gloucestershire CCG & NHS England) and providers to ensure that adequate healthcare infrastructure is provided to support new residential development and to mitigate the impact of population growth on existing infrastructure.	Noted. The LPA have consulted with the GCCG and NHS at every stage of the plan making process and will continue to do so.
	Where new, improved, or extended health facilities are required to mitigate the impact of new development, health commissioners would require Section 106 / CIL funding towards the capital cost of delivering this infrastructure. An assessment of the appropriate mechanisms for delivering the required funding will need to be undertaken at an early stage in collaboration with the Council.	Noted. The LPA have met with representatives of the GCCG in order to establish the need for health facilities given the quantum of proposed development. The GCCG have not been able to supply the LPA with an evidence requirement or inform us of sites they require to be protected for future health care facilities.
	Relevant National Planning Policy Framework paragraphs should also include: Chapter 4: Promoting sustainable transport, Chapter 7: Requiring good design, Chapter 8: Promoting healthy communities, Chapter 9: Protecting Green Belt land, Chapter 11: Conserving and enhancing the natural environment.	Noted. Change to be included.
	The relevant policies from the JCS should also include: Policy SD4: Sustainable Design and Construction, Policy SD5: Design Requirements, Policy SD6: Green Belt, Policy SD7: Landscape, Policy INF5: Social and Community Infrastructure.	Noted. Change to be included.
D1: Active design	We would like to see reference in this policy to the role greening route for active travel can play in delivering multiple benefits, for example active lifestyles in green areas can multiply the benefits for mental wellbeing.	Noted. Change to be included.
	I think providing safe bike lanes to schools, preferably separated from road, should be looked at. We should be aiming to reduce car use in Gloucester to reduce congestion and pollution, improve the	Noted. This issue will be looked at under the context of Sustainable Transport. Cycle lanes are the

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	health of the inhabitants and make the streets and Gloucester more pleasant. It would make sense to me to take the most of the budget needed to improve cycle paths could be taken off the road budget as the less traffic using the roads the less maintenance they need. I think subsidies should be given	responsibility of the County Council and the CP will continue to encourage and support the inclusion of them in new development.
	It needs to be stressed that to "encourage walking to local amenities and services", streets and paths/pavements should be maintained in good order, and be safe and free from puddles and dirt/litter. The city plan ought to be more assertive about improving public walking routes, particularly those that lead into the city centre (e.g. Kingsholm Road and Worcester Street).	Noted. Public footpaths are maintained by County Council Highways. Any issues with the safety or quality of footpaths should be reported to Highways by telephoning 08000 514 514
D2: Outdoor space	We would like to see reference in this policy to the important played by long term management and maintenance of outdoor amenity space and garden space to more effectively ensure its function/s and benefit/s over time.	Noted. Change to be considered.
D3: Accessibility	<p>You would like us to further develop the changing places policy and include it within infrastructure.</p> <p>You would like us to expand the Changing Places toilet statement to a policy:</p> <p>Any sports and play areas should be accessible for disabled children and young people and include play equipment suitable for disabled children and include a Changing Places toilet and changing space in sport/ leisure development (see below). Thousands of people with profound and multiple learning disabilities, as well other disabilities that severely limit mobility, cannot use standard accessible toilets. People may be limited in their own mobility so need equipment to help them or may need support from one or two carers to either get on the toilet or to have their continence pad changed. Standard accessible toilets (or "disabled toilets") do not provide changing benches or hoists and most are too small to accommodate more than one person. Without Changing Places toilets, the person with disabilities is put at risk, and families are forced to risk their own health and safety by changing their loved one on a toilet floor. This is dangerous, unhygienic and undignified. It is now accepted and expected that everyone has a right to live in the community, to move around within it and access all its facilities. Government policy promotes the idea of "community participation" and "active citizenship," but for some people with disabilities the lack of a fully accessible toilet is denying them this right. Although the numbers are increasing, there are still not enough Changing Places toilets across the country, and Gloucestershire has very few at all. Providing these toilets in public places would make a dramatic difference to the lives of thousands of people who desperately need these facilities. Information on Changing Places can be found here: http://changing-places.org/</p>	Noted. Consideration will be given to the creation of a Changing Places policy and to the expansion of the accessibility policy to cover public buildings, open spaces and sports facilities.
	The policy is very vague and imprecise. In particular what does 'taking account of what different people say they want so people can use them in different ways' mean and how can it be assessed and implemented in policy terms? Also phrases like 'use with dignity' and 'convenient and welcoming' in clauses 1 and 2 are equally vague, and offering more than one solution it is imprecise. Whilst having sympathy for the good intentions of this policy it does not work as a formal Local Plan policy.	Noted. "Use with dignity" is an obvious right for all. Consideration will be given to tightening the policy wording.
	We would like to see a reference in this policy to the role community engagement can play in delivering accessible and inclusive design. Development proposals that effectively engage all members of society, and consider how to integrate the needs of all user groups into a design, are	Noted. Comments to be included where appropriate in the next iteration of the plan.

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	<p>more likely to deliver development schemes which can be enjoyed by all community members into the long term. The work published by the Barnwood Trust on sustainable communities and inclusive design, in particular ‘Welcome to The Future’ (2016) is particularly useful in this regard. They recommend methodologies for encouraging developers to consider the accessibility and inclusivity of developments at each stage; and suggest ways to move beyond compliance by encouraging development proposals to create communities where everyone can flourish, enjoy healthy and active lifestyles and actively contribute to their community.</p>	
D4: Allotments	<p>It was noted that the need for this level of allotment provision is not evidenced by the policy and it is considered likely that this would result in excess provision. Additionally, this policy does not take any account of the areas of the city which may have adequate provision. This could lead to an oversupply in certain areas of the city resulting in allotments being unused or users having to travel in order to reach their allotment which would not represent a sustainable form of development.</p>	Noted. Further evidence will be undertaken to assess need and spread of provision.
	<p>It was also noted that the policy does not make any reference to viability considerations as required by paragraph 173 of the NPPF and therefore, should the Council be able to present evidence which supports the continued inclusion of this policy within the Plan, wording should be added to make clear that this requirement is subject to viability.</p>	Noted. Viability testing will be added to the policy.
	<p>You suggested that the policy should be reworded as: “In housing developments of 30 or more dwellings, the Council will require the provision of a fully serviced allotment site to a standard of 0.2 hectares (1/2 acre) per 1,000 population where it can be demonstrated that such provision is necessary. Off-site financial contribution will be acceptable where on-site provision is not feasible. This requirement is subject to viability...”</p>	Noted. Policy to be amended.
D5: Open space	<p>We would like to see reference in this policy to the important played by long term management and maintenance of Open space to more effectively ensure its function/s and benefit/s over time.</p>	Noted. The council has no authority to manage or maintain private spaces but will continue to encourage developers to consider the long term management and maintenance of their land. Public open spaces owned or adopted by the council will continue to be maintained and managed by the council.
	<p>Policy D5 – needs an ‘or’ to allow off site when not appropriate on site.</p>	Noted.
D7: Protection of open space and playing fields	<p>Part 5 does not work because it is not always necessary to provide a greater quantity, if the replacement is through 3G or 4G pitches which will require less area in quantity terms but would considerably increase capacity</p>	Noted. The adopted Playing Pitch Strategy shows that for most grass sports, the City has a shortage of pitches now and in the future. It is important therefore to ensure that new developers make adequate provision for the needs arising the new communities that will live in their developments.

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	The policy is contrary to national policy because it includes a presumption against. This should be redrafted to provide a positive obligation because Paragraphs 14 and 15 of the NPPF require plans to reflect the presumption in favour of sustainable development. Negative policies reinforce the reactive development control mind-set rather than the positive development management approach suitable for a genuinely plan-led planning system.	Noted. There is a presumption against the loss of playing fields where there is evidence to justify this position. This is NPPF compliant.
D8: Community facilities	You feel that the overarching objective of the policy reads as a guide to facilitate the redevelopment or change of use of community facilities.	Noted. The policy is structured to allow the disposal of community facilities that are genuinely surplus to requirements and unsuitable, whilst protecting against the unnecessary loss of viable community facilities. It is of no value to a sustainable community to have abandoned building sitting unutilised due to overly restrictive policy making that does not allow for their reuse.
	Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.	Noted. The policy is structured to allow the disposal of community facilities that are genuinely surplus to requirements and unsuitable, whilst protecting against the unnecessary loss of viable community facilities.
	Restrictive policies that prevent the loss or change of use of 'community facilities' and include healthcare facilities within this definition can prevent or delay required investment in alternative facilities and work against the Council's aim of providing essential services for the community. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.	Noted. This information collated by the NHS could be submitted as evidence to satisfy the policy as part of the planning application process.
	Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).	Noted. Properties that can demonstrate that they are surplus and meet the tests of the policy can be redeveloped for other uses. However, it would be presumptuous to assume that housing is appropriate on all sites that are currently utilised for healthcare. Each site would need to be considered on a site by site basis.
	Many community facilities are run by community volunteers, charities, etc and are therefore not considered 'viable' in a developer sense. Given these facilities are essential to support local communities, we would encourage council to put a greater emphasis on community need (or demonstrate a lack of need) rather than financial viability.	Noted. It would be deemed unreasonable of the council to force a building owner to continue running a building at a personal loss regardless of whether or not there is a community need for the facilitate. However the caveats of the policy have

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		been designed to ensure that any lost facility is replaced to accommodate the evidenced community need, and that the claims made by the owner are robustly tested through the implementation of the policy.
D10: Air quality	It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted.	Noted. Further consideration will be given to the air quality evidence base and the wording of the policy.
	We would expect to see a cross-reference here to Policy F5: Green infrastructure, to recognise the role green infrastructure can play in mitigating the worst effects of air pollution in urban environments, for example planting street trees alongside highways.	Noted. Change to be included.
	I notice that Barton Street and Painswick Road are both areas where the Air Quality is unacceptably low. As I use these routes regularly I wondered what measures were actually being taken to improve this situation. In general the main source of air pollution seems to be from cars and buses. Are active steps being taken to encourage electric cars and buses?	<p>Noted. There are currently two charging points in the city for electric cars. Funding is available from central government to install charging points, both for local authorities, residents, businesses and charities. Further information about this and the council's advice for reducing air pollution can be found at http://www.gloucester.gov.uk/resident/pests-pollution-and-food-hygiene/pollution/Pages/Air-Quality-in-Gloucester.aspx</p> <p>Further information will be added to the supporting text to sign post developers to this funding.</p> <p>The council reports annual on its progress towards delivering the government's air quality objectives. The air quality work links with the Local Strategic Transport Project which is key to reducing car usage and promoting sustainable transport. The council has also been working with bus operators to upgrade existing bus fleet to Euro-4 compliant vehicles that are less polluting. More details of this and other work that the council are doing can be found in the annual report.</p> <p>The next version of the CP will be looking at intensifying tree planting in the city through the identification of areas to be woodlands and orchards.</p>
We would like to see a reference here to the important role that tree planting and retention can play	Noted. Text to be expanded to incorporate the role	

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	in improving air quality in Gloucester. Trees further improve air quality through the adsorption of particulates from vehicle emissions and other sources – such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University). The Woodland Trust has published a report entitled Urban Air Quality which explains how trees can specifically help improve air quality.	of tree planting. Further work to be undertaken to look at tree planting patterns and the Air Quality Management Areas.
D12: Pollution	There was support for this policy as it was felt that it will help to protect the waterways from pollution.	Noted.
	You suggested the following wording: Development that may be liable to cause pollution of water, air or soil, or pollution through noise, dust, vibration, light, heat or radiation will only be permitted if appropriate and sufficient mitigation is included in the development proposal to evidence that the quality and enjoyment of the environment would not be unduly damaged or put at risk in the short, medium or long term.	Noted. Change to be incorporated.
	We welcome that pollution and contamination are included within this section of the Plan. We consider the wording of policy D12 pollution could be improved to incorporate more of an enhancement stance, rather than being just about prevention. Furthermore it should state that development proposals should be accompanied by appropriate reports (i.e. assessments of potentially polluting aspects).	Noted. Consideration will be given to the suggestion of enhancement but we must ensure that all policies are reasonable. The appropriate documents are required through the planning application validation process. Where appropriate these could be referred in the supporting text.
D13: Contamination	There was support for this policy as it was felt that it will help to protect the waterways, groundwater and human health from pollution and contamination.	Noted.
D14: Cordon sanitaire	You would like to see the evidence that the cordon sanitaire boundary is evidenced and up to date. You consider the policy unsound without this. It was also suggested that the second paragraph explaining the ‘blight’ of the designation should be removed if it is not scientifically proven and justified.	Noted. We have requested this information from Severn Trent. At the time of writing we are still awaiting a response. When a response is received this information will be fed into the next version of the CP.
	The onus is on the developer to prove (via odour surveys etc) that any new development will not be adversely affected by the proximity of our works and / or that they will fund appropriate Odour mitigation works to address any odour issues.	Noted. However the CP has a responsibility to deliver sustainable and healthy communities. It is unacceptable to the would be exceptionally bad planning to allow development in an area
D15: Suicide prevention	It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted.	Noted. Further guidance will be produced either through the CP or an accompanying guidance note.
	You welcome our recognition that spatial planning can play a role in helping to prevent deaths by	Noted. Local examples can help inform the evidence

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	suicide through its policies and the inclusion of a suicide prevention policy (Policy D15) in the draft City Plan. In particular, the wording of the policy to include all buildings with four storeys or more is based on evidence of where the policy can have greatest impact – for example, we know from local evidence from the Police that the inclusion of barriers on the Gloucester Royal Hospital car park has prevented deaths – and avoids differences in interpretation about what constitutes public access to a building. Since around 2009, the rate of deaths by suicide in Gloucestershire has been higher than the England rate.	base.
	You would welcome us expanding the policy to other forms of development where there may be a risk of suicide attempts, e.g. waterside development, where there is sufficient evidence that it may have an impact on preventing deaths.	Noted.
	You recommend the document “Preventing suicides in public places – A practice resource” published by Public Health England, and acknowledge that responsibility for suicide prevention lies with local authorities.	Noted. Reference to the document to be included in the CP or supporting background evidence base.
	Gloucestershire Suicide Prevention Partnership Forum have offered to provide support and advice to Gloucester City Council planners in their application of this policy.	Noted. We welcome the offer of assistance on this matter.
	Again, whilst we have sympathy with the sentiments of the policy, we do not think it works or is appropriate as a formal Local Plan policy. Also the wording of the policy does not make sense. What does the sentence ‘mitigation measures are well designed and incorporated into the design of the building’ mean and how is to be applied in policy terms?	Noted. Further details will be provided but the council will not negate on its responsibility for suicide prevention.
	I am writing on behalf of the Gloucester Samaritan Branch to offer support for the plan in respect particularly of the consideration and planning around keeping the city safe, particularly tall buildings and waterways.	Noted.
E: Historic Environment	You suggested that the River Severn should be identified as a heritage asset.	Noted.
	Heritage – Drop in centre/opportunity for advice on Listed properties – how to maintain, or materials needed for repair etc	General advice can be sought from the council’s conservation officer. There is also information available on the council’s website. The THI scheme also runs workshops for building owners.
	Mindful of the important role that heritage related tourism plays in the City’s local economy and the City’s evident ambition to grow this sector, it is surprising there is no reference to it as a key issue. I refer to GCP paragraph 2.17. How does the Plan, and its positive strategy for the historic environment, support the City as a heritage visitor destination? How can it harness the benefits of heritage to the economy of Gloucester?	Noted. Strengthen tourism and heritage link through the supporting text. Work is currently underway through the ‘Great Places’ bid. Section to be expanded.
	At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment...”. (NPPF paragraph 9). Hence one would expect to see the consideration of the role of the historic environment across the Plan.	Noted and agreed. Work to be undertaken to carry heritage through other policy areas as in the JCS.

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<p>Historic England would encourage reference to how the City’s heritage strategy including for example Project Pilgrim at the Cathedral, public realm and other improvements that can help to improve the visitor experience.</p> <p>As a result how might the GCP conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment? What opportunities are there for heritage-led regeneration?</p>	<p>Noted. Reference to be included to the History Festival, THI, Living over shop initiative, Project Pilgrim, Great Places bid money etc. The council are currently working on the production of a Heritage Strategy.</p>
<p>Section E of the Draft Gloucester City Plan includes historic environment information and policies which are appropriate to the archaeological significance of the city and its hinterland. Policies E1 and E2 and their accompanying text are supported. The plan is supported by an extremely detailed evidence base including a historic environment topic paper and 17 site specific historic environment assessments undertaken for the SALA. Potential archaeological constraints are also identified where required in the information regarding individual allocations in the draft plan and the site allocations topic paper.</p>	<p>Noted.</p>
<p>Both the draft plan and historic environment topic paper make clear the City Council’s commitment to continue supporting the joint Gloucestershire Historic Environment Record.</p>	<p>Noted. The Historic Environment Record forms a crucial part of the evidence base.</p>
<p>This section on the GCP provides the means to set out the proposed heritage strategy to meet national policy expectations. However and notwithstanding the many commendable positive measures referred to, to fully accord with NPPF paragraphs 126 and 157 HE would suggest that this section of the GCP needs further development, setting out in greater detail a “positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment”.</p> <p>A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness. HE believes that it is clear from the NPPF requirements that the Government is expecting local planning authorities, through their Local Plans, to actively deliver the conservation and enhancement of the historic environment. The Government’s use of the words and phrases “seeking positive improvements”, “positive strategy”, “deliver the conservation and enhancement” and “a clear strategy for enhancing” all demonstrate that it is not sufficient for local planning authorities to be merely reactive in the conservation and enhancement of their historic environment.</p>	<p>The council are currently working on the production of a Heritage Strategy which will expand on these points. In the meantime we will add a list of positive works at the beginning of the chapter. Including History Festival, THI, Living over shop initiative, Project Pilgrim, Great Places bid money, culture board work, regeneration sites, etc</p> <p>Add reference to “seeking positive improvements” and “positive strategy” to the text of the CP.</p>
<p>We assume the priority regeneration sites will help to restore, reconnect, rejuvenate important locations within the historic core and provide an opportunity to celebrate and enjoy Gloucester’s rich and varied heritage. Might these be referenced?</p>	<p>Noted and agreed.</p>
<p>Can this section of the GCP refer to, for example, the plans for the Cathedral (the finest example of</p>	<p>SPDs are available of the Heights of Buildings and</p>

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<p>Perpendicular Gothic architecture in the world), the role of Policy G17: Views of the Cathedral, public realm improvements; the benefits of the large regeneration sites within the city centre; the prison’s refurbishment, and; the role of heritage in the tourist economy? Might it also refer to initiatives such as at St Aldates (Policy SA11), Blackfriars (SA16), Southgate Street THI etc? A single heritage map highlighting the assets, and the spatial initiatives would be very informative.</p>	<p>the Public Realm Strategy which have visual maps. Further consideration will be given to the idea of a single heritage map, although it may be the case that this is best placed in the emerging Heritage Strategy.</p>
<p>The GCP should indicate what SPDs have been prepared, when they should be applied and where they are available e.g. Heights of Buildings SPD. Likewise regarding Conservation Area Appraisals and Management Plans and Article 4 directions.</p>	<p>Noted. Relevant SPDs to be listed in the text.</p>
<p>What is the role of the Townscape Character Assessment and Public Realm Strategy?</p>	<p>TCA will provide an evidence base of how the city evolved and the characteristics of each distinct area. The PRS will provide guidance on improvements to the public realm.</p>
<p>The Council may find it useful to specify the types of evidence it would expect to see submitted as part of planning proposals. Any list of evidence need not be exhaustive but would help all parties understand the Council’s requirements in this regard and may help speed up the determination process for these types of planning application.</p>	<p>Noted. This information is contained within the validation checklist. A review of the checklist is ongoing. Pre-application advice is also available from the council.</p>
<p>What is the role for CIL and/or s106 in the delivery of heritage related regeneration initiatives?</p>	<p>Noted. There are no specific projects identified through the CIL work for heritage initiatives.</p>
<p>What indicators should be used to monitor the heritage strategy’s effectiveness?</p>	<p>To be confirmed through the emerging Heritage Strategy.</p>
<p>How might the defining characteristics of each part of the City be reinforced in the approach to design?</p>	<p>Through the TCA , the Design Policies listed in section G and effective Development Management.</p>
<p>The GCP needs to consider whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157).</p>	<p>Noted. The Heights of Buildings SPD provides guidance. The requirement for any Article 4 designation will be determined through future Conservation Area reviews.</p>
<p>Can the GCP refer to the relevance of Gloucester’s Cultural Vision and Strategy (2016-26) and, Growing Gloucester’s Visitor Economy (2014) and how the GCP can help deliver their aspirations as part of a positive heritage strategy?</p>	<p>Noted. The emerging Heritage Strategy will bring together all relevant documents.</p>
<p>You welcomed the preparation of the Historic Environment Topic Paper and ward profiles.</p>	<p>Noted.</p>
<p>Preserving and enhancing a heritage asset (the H&G Canal and associated buildings) as a tourist attraction, as well as engaging local community and volunteer groups.</p>	<p>Noted. The policies benefit and protect all assets including waterways.</p>
<p>The text does not identify the Key Issues as is done in other sections of the GCP. Instead the narrative provided presents a discussion without actually pointing to what the key issues are.</p>	<p>Noted. The key issues have been identified.</p>
<p>In order to help clarify the significance of the historic environment in Gloucester, it would be useful to specify the number and type of historic environment designations, for example, how many listed buildings there are, or how many conservation areas there are and whether these designations are</p>	<p>Noted. This information is included in the background topic paper. Consideration will be given to pulling across more of that information across</p>

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	supported by up to date appraisals (if not, whether there are any proposals to undertake new appraisals in future).	into the CP.
	Does this section in the GCP fully reflect the Historic Environment Topic Paper?	Noted. Consideration will be given to pulling across more of the information held in the topic paper across into the CP.
	The City Council could increase the emphasis they place on the importance of heritage and refer to the fact that the Heritage Lottery Fund is already investing significant funds into the city over the first five years covered by the consultation plan.	Noted. Expand more on this point.
	I would welcome the inclusion of archives in the definition of culture/heritage as we play just as significant role in the city as the libraries and museums, even though our remit is county-wide.	Noted. The council acknowledges the significant role and contribution archives play in the heritage of the city.
	An Article 4 designation for Alexandra Road, Denmark Road and Heathville Road to protect traditional timber joinery on these streets. (See the replacement windows at 23 Alexandra Road and compare to 21 Alexandra Road for an example of the negative impact window replacement can make.) Similarly look to invest in a THI scheme for London Road/Northgate and the eastern portion of Eastgate Street once the work on Southgate has been completed.	Noted. There are no resources to undertake this at this time. Article 4 designations will be reviewed as part of future Conservation Area reviews. In terms of THI schemes the most pressing area at this time is the Barton St Conservation Area. Grants have previously been offered in Eastgate Street.
E1: Historic environment development management	Support the protection, conservation and enhancement of waterways' heritage and their built environment.	Noted.
	Policy E1 refers to further guidance being found in Energy Conservation in Traditional Buildings, English Heritage, 2008. This document was superseded in April 2016 by new guidance from Historic England	Noted. Policy to be amended.
	Could we also suggest the following addition: Applications affecting the significance of a heritage asset will be required to provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation.	Noted. This is already included within the chapter.
	Could we also suggest the following addition: Gloucester's Historic Environment Record including Conservation Area Character Appraisal, Management Plans, Local List and Townscape Character Assessment will be used to inform the consideration of future development including potential conservation and enhancement measures.	Noted. The conservation team already utilise these documents in the formation of their responses to planning applications.
	Could we also suggest the following addition: You may wish to include reference to the matter that proposals should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.	Noted. Wording to this effect is already contained within the NPPF which we do not wish to repeat.
	Could we also suggest the following addition: Clarification in the policy or accompanying text that the historic environment includes all heritage assets such as historic buildings, conservation areas, historic parks and gardens, landscape, town and cityscapes of importance and archaeology.	Noted. A description is provided in the glossary.
Historic England notes this welcome core policy as an important part of a clear and positive strategy	Noted. Change to be incorporated.	

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	<p>for the historic environment (NPPF Paragraphs 9 and 126). This will in turn help support the delivery of development that will afford appropriate protection of the City’s heritage assets and make a positive contribution to local character and distinctiveness. However modest adjustments are required to ensure clarity and conformity with national policy expectations.</p> <p>The second bullet point of Policy E1 refers to a series of criteria as “guidance” which suggests they are optional. However this is clearly not the intention as they are policy requirements; consequently the word guidance should be omitted.</p>	
	<p>The 4th bullet point refers to conservation area policy but limits the consideration to architecture and history. It is suggested that character and appearance are referred to, to align with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990); and which architecture and history are contributory factors of.g. Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.</p>	<p>Noted. Change to incorporated. Character and appearance to be included in this point and in bullet point 2. Bullets to be changed to a numbered list.</p>
	<p>The 5th bullet point solely refers to substantial harm. Could we suggest the following as an alternative: Great weight will be given to the conservation of Gloucester’s heritage assets. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.</p>	<p>Noted. Change to be incorporated.</p>
E3: Buildings of local importance	<p>Policy E3 refers to Conservation Area Consent. This was abolished by the ERR Act (1) 2013 and replaced with a requirement for planning permission for demolition in a conservation area.</p>	<p>Noted. Policy wording to be amended.</p>
F: Natural Environment	<p>An issue was raised over whether biomass was no longer considered environmentally friendly and is now thought to be polluting and possibly contributing to deforestation.</p> <p>Disagree with the findings of our Habitat Regulations Assessment Screening and believe that there will be a significant effect on the Cotswold Beechwoods.</p>	<p>Noted. Clarification sought and reference to biomass to be removed if appropriate.</p> <p>Noted. Growth in the CP will not exceed the levels of growth expressed and tested through the JCS process. The JCS has set the overall level of growth and a HRA was undertaken during its preparation. The HRA screening of the JCS found that for 12 of the 13 identified European sites there would be no significant effects, although there was some uncertainty regarding the in combination effects on 7 European sites as a result of changes to Air Quality, Disturbance and Water Levels & Quality. There was</p>

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	<p>also uncertainty around the significant impacts that short range atmospheric pollution might have on the Cotswolds Beechwoods SAC. Therefore, an Appropriate Assessment (AA) was undertaken to gain a more detailed understanding of the possible significant impacts which may occur. The AA made a number of recommendations to ensure potential impacts on European sites did not occur, including conducting a transport assessment and a water cycle study, and strengthening the flooding policy. Overall the HRA concluded that with consideration to the recommendations provided, the Draft JCS would not have significant alone or in combination effects on the integrity of the identified European sites. There was some uncertainty raised during consultation and examination by Natural England regarding the potential recreational impacts on the Cotswolds Beechwoods SAC and proposed mitigation measures. However, this has now been resolved through a HRA Addendum Report⁸ (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and Natural England. No further concerns on the HRA have been raised during examination of the JCS and therefore, it can be concluded that the strategic development proposed for Gloucester in the JCS will not have adverse effects on the identified European sites.</p>
<p>Need to acknowledge that natural environments provide the settings for certain sports and activities: climbing, caving, aerial sports and aquatic sports such wind surfing, sub-aqua etc, which can not be take place elsewhere. Consideration needs to be given to management plans to allow these activities to start or continue to mitigate for any potential harm.</p>	<p>Noted.</p>
<p>The text does not identify the Key Issues as is done in other sections of the GCP. Instead the narrative provided presents a discussion without actually pointing to what the key issues are.</p>	<p>Noted. Edits to be made where appropriate.</p>
<p>Is bullet point 7 on social unrest through increased migration in the correct category?</p>	<p>Noted. The Foreign Office has reported of the risk of unprecedented migration as a result of climate change.</p>
<p>The bullet points under this introductory section do not include any reference to rare or protected</p>	<p>Noted. Amendment to be made where appropriate.</p>

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species or those of principal importance for the purpose of conserving biodiversity as required under Section 41 of the Natural Environment and Rural Communities Act 2006.	
There is no specific reference in the Evidence Section for biodiversity or geodiversity, and that considerable information held by the Gloucestershire Centre for Environmental Records (GCER) about biodiversity in the City and RIGS held by the Gloucestershire Geology Trust which is not referenced. You suggest we use this sources when considered brownfield sites.	Noted. Sources to be added.
On page 56 within the Natural Environment Key Issues whilst the floodplain of the River Severn is briefly mentioned, there is no other reference to flood risk (from all sources) which we believe is a significant oversight within this part of the plan. It is noted that climate change has been specifically highlighted and whilst the plan quotes ‘Resilience to weather extremes, especially the heat island will be a key issue.’ We feel an equally key issue for Gloucester will be resilience to the impacts of climate change on flooding from all sources within the urban area and where this bounds the Severn floodplain.	Noted. Agreed. More to be added to this section on this important issue.
The plan fails to identify the Local Wildlife Sites which are mentioned by National Planning Policy Guidance at Paragraph: 012 Reference ID: 8-012-20140306. Further details of these sites are available from the Local Records Centre at http://www.gcer.co.uk/ The missing Key Wildlife Sites appear to be: Gloucester & Sharpness Canal KWS, The Causeway, Quedgeley KWS, Robinswood Hill Country Park KWS, Matson Wood KWS, Hucclecote Meadows KWS, Barnwood Arboretum & Park KWS, Sandhurst Lane Meadows KWS, Alney Island KWS, Sud Meadow KWS	Noted. All Local Wildlife Sites to be included.
Section F has a good range of policies for the protection and enhancement of the natural environment and is welcomed.	Noted.
Relevant National Planning Policy Framework paragraphs should also include: Chapter 4, 7, 8, 9, 10 and 11.	Noted. Change to be included where appropriate.
Relevant policies from the JCS should also include: SD1, SD4, SD6, SD7, SD10, SD15, INF3, INF4 and INF6.	Noted. Change to be included where appropriate.
Support for a specific orchard policy (as has Tewkesbury Local Plan ENV6 Orchards, for example); especially the restoration of old orchards and creation of new community orchards. The policy should cover not only orchards as a discrete piece of land, but also linear orchards (ie, fruit trees growing along paths and public rights of way, and on hedge lines) and veteran fruit trees. The policy should also encourage imaginative street scene planting schemes such as the “fruity streets” which have been done on the award winning Applewood development at Cashes Green, Stroud, as well as forage trails. The reasoned justification should also refer to the importance of orchards on the grounds of biodiversity (upto 1800 species of fauna and flora), amenity, culture, history, and as a genetic resource. They are also of economic value. Veteran perry pears can live up to 300 years and require expert evaluation and management. A good way to mitigate biodiversity and landscape loss is through orchard planting. (Detailed information about the benefits of orchards was given and can be found in the full response.)	Noted. Consideration to be given to the inclusion of an orchard policy and wider reference to be given to orchards, woodlands, trees and hedgerows wherever the natural environment is mentioned throughout the CP. We are undertaking an exercise to map all of the orchards and woodlands.

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F1: Landscape	This policy should acknowledge that some development will need to be located on countryside land in order to meet the housing, employment and retail needs of the area. Such development will inevitably cause a degree of harm to the landscape but this needs to be weighed in the overall balance. The policy should also acknowledge that some development may need to be located within the higher sensitivity landscape areas in order to achieve the most sustainable forms of development.	Noted. Development located on higher sensitivity landscape will not normally be permitted.
	<p>Whilst there is a landscape policy in the JCS, this is more related to the setting of settlements rather than development in the urban area and so a more specific landscape policy in the Local Plan would be appropriate. However, the Local Plan position is confusing by including two separate landscape policies F1 and G4. The two policies should be combined and revised as follows:</p> <ol style="list-style-type: none"> 1. The first paragraph of F1 should begin ‘development proposals on . . .’ 2. Evidence for and justification of the definition of major development should be provided and the difference between the definition for major residential development in this policy and Policy B1 resolved. 3. The second paragraph to F1 should be deleted because it only repeats the provision of JCS SD7 but in a less satisfactory way. 4. The third paragraph of F1 is unclear. There is no definition of ‘sites of higher sensitivity’ or what ‘increased scrutiny’ of these sites mean. 5. In Policy G4, requiring landscape schemes to be on a single plan is unnecessary and restrictive. 6. Paragraph 2 of G4 should also enable the replacement of such features where it will be inappropriate for them to be retained (eg to provide access through a site). 7. It is not necessary to emphasise housing schemes in this policy. 	<p>Noted. F1 to be renamed ‘Landscape Character’ or similar to provide distinction between this and G4. G4 to be renamed ‘Landscape proposals on new development’.</p> <p>The combination of the two policies is not deemed appropriate at this time.</p> <p>Amendments to definitions and phrasing to be undertaken where appropriate.</p> <p>Further consideration will be given to any overlap with SD7 and the policy amended where appropriate.</p>
F2: Biodiversity	You welcome and support this policy but feel that it could go further.	Noted. Further consideration to be given to strengthening this policy in light of responses received.
	The JCS includes a detailed policy on biodiversity which deals with international, national and locally designated sites as well as undesignated sites and the impact of new development on biodiversity and so therefore this policy is unnecessary. In addition the policy itself is badly drafted. How is small scale piecemeal erosion of ‘background biodiversity’ to be assessed and how will it be prevented? Secondly, the second paragraph is clearly an aim and background justification and should in any event not appear as part of a formal policy. For all the above reasons the policy should be deleted.	Noted. Further consideration to be given to the necessity of this policy and its alignment with the JCS SD 10.
	The policy does not go on to deal with biodiversity in other situations or more broadly and does give reference to the NPPF on this topic. We suggest that this policy begins by highlighting the role which the planning system can play in conserving and enhancing biodiversity by adding: “All development should seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible, including by establishing coherent ecological networks that are more resilient to current and future pressures”.	Noted.

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	<p>We note that this policy is to be used in conjunction with the policy in the Joint Core Strategy (JCS). However we feel the policy could be more positively and definitively worded. Currently it refers to government aspirations, but it should be clear about what the Council expect development to deliver as part of this. For example, see the comments above about opening up culverts and providing easements. It could also refer to the need to provide mitigation and enhancement measures for particular species such as otters and fish. In addition, the policy could include specific references to planting for climate change mitigation and adaptation, and retrofitting of SuDS. The evidence to support such is within Paper 1 Climate Change (see comments below in that section.) Furthermore we would welcome reference to the WFD in this policy/supporting text. (See also our comments on WFD in the 'Paper 10 Natural Environment' section of our letter.) We would be happy to provide further advice, in conjunction with Natural England and the County Ecologist if required.</p>	Noted and accepted.
	<p>Policy F2 – it is suggested the phrase 'of background biodiversity' is replaced with 'biodiversity in general' and 'mitigated against' to 'mitigated to avoid loss'. Otherwise this is a very relevant policy for an urban area such as Gloucester.</p>	Noted. Change to be incorporated where appropriate.
F3: Nature Improvement Area	<p>The policy is, in principle, supported with an objection restricted specifically to the inclusion of allocation site SA23. The sites referred to should be removed from the proposed NIA designation for the primary reason that they are not part of the flood plain but part of the higher land on which the settlement of Hempsted has been founded.</p> <p>It is acknowledged that if the amended NIA boundary suggested here is accepted it will abut site SA23 to the west and south. SA23 would be an adjacent site.</p>	<p>NIAs are not designated through the CP. They are 'recognised' by the Local Nature Partnership. As such the CP can not remove sites as a NIA. NIAs are not strict barriers to development. They are priority areas offering good opportunities for ecological network restoration and improved habitat management. This work can sometimes be realised through the development management process.</p>
	<p>The policy is badly worded. If as in the supporting paragraph the intention is to secure off site biodiversity offsetting then the policy needs to say that, and guidance provided on how it is to be achieved.</p>	Noted. Change to be incorporated where appropriate.
F4: Trees and hedgerows	<p>It was suggested that we do more to create, protect and enhance woodlands and orchards given the many health benefits they can bring to a city.</p>	Change policy name and text to include reference to woods and orchards. Commit to planting more trees and identify these areas on the policy plan.
	<p>In dealing with retention of trees on development sites, rather than relying on 'appropriate retention' which is open to interpretation by different parties involved, it is preferable to say development proposals should minimise the loss of existing vegetation that is important or of value in ecological, recreation, historical or landscape terms. This then provides the opportunity for the applicant to demonstrate how the policy requirement is met.</p>	Noted.
	<p>This policy would be much stronger if it actually specified the number of new trees a developer is required to plant e.g. a certain number based on the size of the site.</p>	Noted. It is more flexible to look at each site and its individual context. Some sites will inevitably require more planting than others. On other sites, such as in the core of the central area, it would not necessarily

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		be possible to plant a set number of trees on site. We will explore the idea of diverting tree planting to nominated woodlands.
	The wide reaching benefits of trees in urban areas were highlighted in detail including health and wellbeing, urban heat island, urban cooling, climate change, flood amelioration, local economy and biodiversity. Extensive comments were received in support of increasing woodland in line with national policy, the councils statutory duty under Section 197 of the Planning Act (1990), NPPF para 114 and 117, England Biodiversity Strategy (Biodiversity 2020 published by DFRA 2011), the Government Forestry Policy Statement (Defra Jan 2013):. Detailed policy examples from East Hants, Solihull, Stroud and others were provided. habitat expansion, like native woodland creation, should form a high priority for Gloucester’s new City Plan.	Noted and accepted. Further work to be undertaken to highlight the important contribution made by trees to the urban environment. Policy and provision to be strengthened.
	We welcome a policy dedicated to the protection and planting of trees and hedgerows. However, we feel that stronger statements could be made here. For example, ensuring every opportunity is taken to secure new planting as part of any new development proposal, rather than just ‘appropriate retention and new planting’.	Noted and accepted.
	In addition to a strong commitment to increase tree cover across Gloucester, it is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. Detailed policy examples provided in full comments.	Noted and accepted. Ancient trees, ancient woodland, veteran trees and large urban trees to be afforded more status and protection through the CP.
	We would like to see Policy F4 contain a more robust statement in support of woodland creation and tree planting as part of a green infrastructure approach. The Woodland Trust also calls for Gloucester City to back up this policy with a specific Trees and Woods Strategy. Good practice guidance for local authorities on developing a Trees and Woods Strategy can be found here. (link provided) Further we would recommend the following wording with regard to ancient woodlands, ancient trees and veteran trees: ‘Development which would result in the loss of Ancient Woodland or Ancient trees and veteran trees will not be permitted other than in wholly exceptional circumstances’	Noted and accepted. Ancient trees, ancient woodland, veteran trees and large urban trees to be afforded more status and protection through the CP. In addition monitoring and review could include the number of trees lost and planted.
F5: Green infrastructure	We welcome support for the provision and enhancement of Green infrastructure. The Trust promotes the canal and towpath as ideal examples of multi- functional Green Infrastructure due to the range of benefits they bring to an area such as a sustainable transport route, an ecological corridor and a free recreational resource, a freely accessible to all. We will continue to work with the council to promote the waterway as green infrastructure within the IDP and other council documents.	Noted. Reference the canal and towpaths to be incorporated into the supporting text.
	We welcome the inclusion of reference to the Gloucestershire Wildlife Trust green infrastructure benchmark, and can confirm GCC have been assisting in its development, showing their commitment to influence the high quality of green infrastructure coming forward in all new strategic planning proposals.	Noted.

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	<p>We feel that to include a discrete policy in the Local Plan for green infrastructure represents a missed opportunity to emphasise the role green infrastructure can play as a strategic framework for recognising and promoting the multi-functionality of each of these features and how they link together as a network. Although clear links are made to the JCS Green Infrastructure Strategy, which includes locally focused actions for Gloucester, and a Gloucester GI Map, we are not sure how these two documents will support in each in practice and feel this policy does not serve to clarify that. The policy here refers to a Green Infrastructure Plan (GIP) for Gloucester City, however we're not clear what this document is, or where it sits as there is no reference in the JCS GI Strategy to a discrete GI Plan for Gloucester City, with delivery section instead including all three district areas. We would seek further clarification on this to better understand how this policy F5: Green infrastructure will support the delivery of a network of multi-functional and connected features and areas to meet both the objectives of the Gloucester GI Map, the JCS GI Strategy as it relates to Gloucester, and the wider objectives for the Natural Environment and Health and Wellbeing articulated in this draft Local Plan.</p>	Noted. Further explanation and understanding of the interplay between the GI documents required.
	<p>There is lack of clarity over what document the policy is seeking to implement, either the Gloucestershire County Council Green Infrastructure Plan or the JCS Green Infrastructure Strategy. Also we note that neither document is identified in the Sustainability Appraisal list of key plans and programmes. In any event it is not appropriate to apply the same policy to development both within and adjacent to the identified GI feature.</p>	Noted. Further clarification to be provided.
	<p>It is essential that woods and trees are recognised and explicitly referenced within this policy as a component part of green infrastructure across the city.</p>	Noted. Reference to trees and woodlands to be added.
	<p>Policy F5 – is supported particularly as it implements the Local Nature Partnership's and JCS's objectives for Green Infrastructure.</p>	Noted.
F6: Geodiversity	<p>Gloucestershire Geology trust holds the most complete record on RIGS in the county. It was highlighted that while Gloucester only has a handful of RIGS in the county, it does have some of the most important. Robinswood Hill being the finest example of Lower Jurassic exposure of any inland Jurassic section.</p>	Noted.
	<p>Objection to this policy as currently worded as it starts with a presumption that geological features should be removed if they are in the way of development.</p>	Noted. Amendments to be made where appropriate.
	<p>It would be helpful if a definition of Regionally Important Geological Site (RIGS) was included in the glossary for the benefit of public understanding.</p>	Noted. Definition to be included.
	<p>It is not clear how the policy requirement that any proposal that impacts on a RIGS will be re-sited?</p>	Noted. Policy wording and clarification to be expanded.
F7: Flooding	<p>While acknowledging that as a low lying City on the edge of the Severn Floodplain that the following may not always be feasible, we recommend that this policy includes reference to Natural Flood Management (NFM) techniques as a way of addressing flooding issues. This could include supporting interventions in the catchment above the City from which much of the water passing through the City and creating potential flooding problems arises.</p>	Noted.

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<p>The JCS includes a more detailed policy on flooding and therefore this policy should be deleted. In addition it is unclear, because it does not provide a definition of 'large scale development'.</p>	<p>Noted. Definition to be provided.</p>
<p>The effective management of water, reducing the impact of flooding, and helping to enhance local amenity value and biodiversity through the provision of green space.</p>	<p>Noted.</p>
<p>The details contained within it are very broad as it relies on those policies set out within the JCS and current National Planning Policy. Whilst on page 62 the second paragraph of the supporting text to policy F7 (flooding) highlights Gloucester's unique position at the interface of fluvial and tidal events, but within the last paragraph on the page the SFRA for the JCS is said only to highlight the impacts of fluvial flooding. However both the Level 1 and 2 SFRAs identify all forms and sources of flooding.</p>	<p>Noted.</p>
<p>We consider the policy needs to contain a commitment to opening up culverted watercourses through development sites. This can reduce flood risk and improve ecology and water quality, as well as adding amenity value to development sites. Where the above is not possible sufficient maintenance easements must be provided on both sides of any culverted watercourse.</p>	<p>Noted. Suggestion to be incorporated into CP.</p>
<p>The supporting text refers to the Environment Agency's Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment (March 2016), this is information provided by the Environment Agency which can help inform a strategic approach to flood risk management in the Gloucester area. In this Initial Assessment, our consultants have carried out computational hydraulic modelling of 44 scenarios to assess their impact on River Severn water levels. Scenarios modelled include those to convey flood flow and also include new or raised defences in a number of locations. They have looked to see whether there are any scenarios which could potentially attract a funding contribution from Defra's Flood and Coastal Erosion Risk Management Grant in Aid. The assessment has concluded that there are no scenarios which are likely to have the full costs met by government funding and all would need to be partially or wholly funded by third parties. Whilst this document may help to contribute to a wider strategic approach to dealing with flood risk issues it is felt inappropriate to refer to it in isolation within this plan. We would therefore wish to see the following wording removed from the proposed document. "The Environment Agency Briefing Note "Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment" March 2016, seeks to protect properties predominantly within Westgate Ward by increasing flood defences along the Eastern Parting of the Severn. Development that contributes to the delivery of the Environment Agency plans outlined in the Briefing Note, and any subsequent amendments, will generally be supported."</p> <p>Similar wording also needs to be removed from the Flooding Topic Paper on page 3 as follows. "With regard to flooding associated with the river Severn, the EA have undertaken detailed hydraulic modelling of over 40 scenarios to assess their impact on water levels in and around Gloucester. This has taken account of tide and high river levels. Scenarios ranged from bypass channels to the raising of traditional flood defences. The scenarios were then tested against an economic model to assess</p>	<p>Noted. Wording to be removed from the CP and any revision of the Topic Paper as requested by the Environment Agency.</p>

3.0 Development management policies – Summary of Comments	Response
<p>viability. The initial assessment suggests that raising of defences at certain sites around Gloucester, in particular around Westgate will deliver the most benefit. And also on page 5 of the same document as follows; Given the unique position of Gloucester at the interface of tidal and fluvial events in the Severn, any development within the Severn Floodplain will be expected to increase flood flow across this area. The Environment Agency Briefing Note: Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment (March 2016) seeks to protect properties predominantly within Westgate Ward by increasing flood defences along the Eastern Parting of the Severn. Development that contributes to the delivery of the Environment Agency plans outlined in the Briefing Note, and any subsequent amendments, will generally be supported.”</p>	
<p>Concerns over the following wording; “Large scale development within flood zone 2 and 3 in Lower Westgate will be expected to contribute to new flood defences along the eastern parting of the River Severn”. This gives the impression that development within flood zone 3 is deemed acceptable by the local authority. It also suggests that new defences are planned within this part of Gloucester, which is not the case. Although we are currently investigating the viability of raising the height of the defence protecting properties on Alney Island in Gloucester we are not currently investigating other raised defences in the Westgate Ward area. Therefore again we request that this wording is removed.</p>	<p>Noted. Text to be amended where appropriate to provide clarity over this issue.</p>
<p>The policy also makes no reference to climate change in relation to flood risk, this doesn't just mean mitigation for new development but also adaption of existing development where appropriate. It is suggested the text is also amended to reflect that developers should design and construct flood risk management solutions which, rather than being done in isolation with an individual development, helps to contribute to an overall strategic approach to flood risk management in the Gloucester City area.</p>	<p>Noted. Reference to climate change to be incorporated.</p>
<p>A strategic approach to managing flood risk that takes into account wider strategic objectives for Gloucester could be of benefit, both for the short and longer term. We suggest that this strategic approach includes actions to manage flood risk, improve resilience and provide suitable recovery from flooding, whilst taking into account wider strategic objectives for the area and opportunities to join these up for multiple benefits.</p> <p>The wider objectives and opportunities could include new development and/or regeneration, infrastructure planning, including transport links, as well as environmental, social and amenity improvements. The Environment Agency is willing to take part in the development of this strategic approach, which we envisage should be led by local authorities in the area.</p>	<p>Noted. Discussions to be held between officers and EA in order to progress the suggestions made.</p>
<p>It is considered that a more appropriate paragraph could be incorporated within this part of the final Local Plan. An initial suggestion could be as follows, but we would welcome further discussion with you about this part of the Plan; As part of its ongoing commitment to reducing flood risk within the city the council will, subject to meeting other national and local policy objectives, support any development that contributes physically or financially to the delivery of any proposed flood alleviation plans or schemes that have a wider benefit to communities at risk within the City of</p>	<p>Suggestion noted. Amendments to be made where considered appropriate. Discussions to be held between officers and EA in order to progress the suggestions made.</p>

3.0 Development management policies – Summary of Comments		Response
	<p>Gloucester. Climate Change Section: As highlighted above the supporting text very much concentrates on mitigation and makes little or no mention of adaptability (though this is referred to very briefly in G16). It also makes no mention of climate change resistance (prevention) and only refers to resilience which is a lower grade of protection.</p> <p>This links with the comments in the flood risk section regarding this: “The effective management of water is important in the development of sustainable communities. It reduces the impact flooding may have on the community, maintains the quality and quantity of our water environment, and can help to enhance local amenity value and biodiversity through the provision of green space.”</p> <p>As part of any development proposals the opportunity should be taken to reinstate open watercourses and maintain/improve riverside habitats by providing appropriate biodiversity easements.</p>	
	Any opportunities being sought in relation to flood risk alleviation or improvement can relate to any drainage authority and the plan policy should reflect this.	Noted. Ensure reference to ‘drainage authority’ rather than a named body.
	The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Stemming the flow – the role of trees and woods in flood protection. This policy should reference the role of tree planting in flood prevention. We note that tree planting and SUDS are mentioned as mitigation factors in policy F10 but would recommend cross-referencing here.	Noted. Amendments to be incorporate where appropriate.
	The Lead Local Flood Authority will fulfil its statutory duty to provide advice to the Local Planning Authority when requested to do so regarding the management of surface water relating to major planning applications with the aim of ensuring related flood risk is managed as effectively as possible.	Noted.
	The JCS includes a more detailed policy on flooding and therefore this policy should be deleted. In addition it is unclear, because it does not provide a definition of 'large scale development'	Noted. Further consideration to be given to the purpose of the policy and definitions to be provided.
	The canal can also be used in flood prevention as it provides a conduit to allow water movement away from Gloucester at times of high river levels.	Noted.
	The words ‘flood defence infrastructure’ should be changed to flood risk management infrastructure, as this can include ‘hard’ defences, but also ‘softer’ options such as property level protection, conveyance and storage schemes, and flood warning systems including the gauges needed to support them.	Noted. Change to be incorporated.
F8: Potential of river and canal	Support and welcome the recognition that the Canal/River to many development sites in particular has the potential to provide heating and cooling for new build and retrofit and you offered to provide details to potential developers at pre-application stage when required.	Add commentary that the Canal and River Trust can provide early advice on this process should it be required.
	The very high flows in the canal could provide a significant amount of heat and any new development should consider this as early as possible in the planning process and seek further advice from the	Noted.

3.0 Development management policies – Summary of Comments		Response
	Canal & River Trust.	
	You object to this policy as currently worded as there is no proviso to take into account the potential impacts of any installation in the watercourses on biodiversity. The Trust suggests that the policy is qualified with “...will generally be supported providing there would be no adverse impact on the biodiversity of the watercourse and its riparian habitat.”	Noted. Biodiversity to be considered and policy amended as appropriate.
	A development which exploits the renewable energy potential of the River and Canal. It must be noted that this scheme is part of the H&G Canal and NOT the Sharpness Shipping Canal. The scheme would link the original navigation (which closed in 1881) between Gloucester and Hereford.	Noted. Error to be corrected where appropriate.
	There needs to be reference to environmental protection as part of any proposals to exploit the potential of the river and canal for renewable energy projects. For example such projects need to be carefully designed so as to avoid impacts on fish, wider ecology, water quality and water resources. All of which are key requirements to protect and enhance under the terms of the Water Framework Directive (WFD). We are generally supportive of such schemes where it is demonstrated that they would not result in deterioration of the water body under the WFD.	Noted. Biodiversity to be considered and policy amended as appropriate.
	Policy should contain a commitment to open up culverted watercourses through development sites. (Or this should appear in F7 or F2) As well as being environmentally advantageous, opening up culverted watercourse can add significant amenity and economic value to development sites.	Noted. Reference to opening up culverts to be included.
F9: Efficiency measures & F10	We question the practicality of providing green roofs on residential development due to the roof pitches on most residential buildings	Noted. The policy makes no reference to the provision of green roofs on all buildings.
G: Design	Relevant National Planning Policy Framework paragraphs should also include chapters 1,2,4,6,7,8,9,10,12	Noted. Change to be incorporated where appropriate.
	The relevant policies from the JCS should also include: SD1, SD4, SD5, SD7, SD9, SD10, SD11, SD12, SD15	Noted. Change to be incorporated where appropriate.
	Need a policy like the current BE.19 to protect the enclosure of front and side gardens on existing open plan estates.	Noted. Policy to be included given the significant number of open plan estates and Radburn layout housing within the city.
	Support for policies to ensure good design on key sites.	Noted.
G1: Living conditions	The policy is badly drafted. It begins ‘the development should not . . .’ What development? It should say something like ‘development proposals . . .’	Noted. Wording will be addressed.
G2: Car parking	While the need to design parking to reduce the opportunity for vehicular crime is to be supported, it is submitted that it may not be possible in all circumstances, especially in regeneration projects, for car parking to be overlooked by active frontages.	Noted. It is possible through good design to ensure the provision of secure and overlooked parking. This is especially important on new regeneration schemes to ensure that good design is built in from the outset and that crime and the fear of crime are reduced.

3.0 Development management policies – Summary of Comments		Response
	In order to make best use of brownfield land or to achieve higher densities as promoted by the Housing White Paper (Feb 2017) innovative approaches to parking will be required in urban locations, including undercroft parking.	Noted.
	What uses does this policy relate to? If it applies to residential development it is too restrictive. Frontage parking is not always appropriate or practical and can have design impacts. The policy should allow side parking and where it can be justified small overlooked parking courtyards.	Noted. Policy to be expanded where appropriate to define use and alternative parking methods.
	There is significant pressure on parking. Recommend expansion of Castle meads with single story decked parking above (relatively inexpensive option). Support decked solution/Multistory for Westgate Carpark if it can be done sympathetically and accommodation is made for coach parking. There is a pressing need for a coach parking solution for the city with over 300 coaches visiting events such as Tall Ships and Quays Victorian Market. This is likely to increase at 7% per annum. Recommend expansion of Castle meads to include Coach Parking plus limited additional coach parking at new Kings Quarter and possibly Nortgate Street/Worcester Street development. The latter will encourage flow through the city for events, benefitting all retailers	Noted. There is ongoing work underway to assess the current and future parking needs for the City.
G3: Materials and finishes	The policy requires architectural detailing and finishes to be of a 'high quality' and whilst the supporting paragraph sets out what this applies to, it does not say how high quality will be assessed.	Noted.
	The policy should begin 'development proposals should achieve . . .'	Noted. Change to incorporate where appropriate.
G5: Bin storage	The policy wording does not make sense and starts with a statement that 'bin storage areas are well designed'	Noted. Text to be revised.
G6: Cycle parking and storage	The policy merely relates to Gloucestershire County Council Parking Standards and should be deleted as it is not necessary for plans to repeat guidance set out elsewhere.	Noted. Consideration to be given to the removal of the policy. Supporting text to be moved to Sustainable Transport section.
G7: Public realm	No specific comments received.	Cross reference with comments received for Section E: Heritage.
G8: Public art	NPPG (ID236-004) provides specific guidance on public art – 'planning obligations should not be sought – on for instance, public art – which are clearly not necessary to make a development acceptable in planning terms.'	Noted. The NPPF does not state "for instance public art". The NPPF recognises that cultural wellbeing is part of achieving sustainable development, and includes cultural wellbeing within the twelve core planning principles which underpin both plan making and decision taking. The NPPF also states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. Both these aims are supported by the integration of high quality

3.0 Development management policies – Summary of Comments		Response
		public art. Policy to be expanded to include culture and the Cultural Strategy work.
	As there is no evidence for including public art contributions the policy should be deleted. Anyway there is a lack of clarity about what development the policy applies to. The policy refers to ‘new major residential schemes’ and the supporting paragraph to ‘suitable new developments’ with no definition of either.	Noted. Public art is complementary to good urban and building design and is a social and cultural investment. Definitions to be provided.
	The requirement for all schemes delivering more than 10 dwellings to contribute to this policy is unreasonable and would adversely jeopardise the viability of some sites that are suitable for residential development in coming forward. This is contrary to the NPPF which seeks to enhance the delivery of housing and the Housing White Paper (2017) which seeks to accelerate the delivery of new homes across the country.	Noted. However this is simply not the case. The council accepts that not all sites will have the capacity within viability terms to deliver public art. This is why the policy ‘seeks provision’ rather than demands provision. However public art need not be an expensive and of a large scale. Public art can provide benefits to both existing and new communities and developers.
	It is suggested that when contributions towards public art or heritage conservation are required from development that this be stated in a site specific policy, rather than apply a blanket policy in the City Plan. Such a S.106 contribution requirement should also be subject to the viability of the scheme in question, and should be taken into consideration alongside other contribution matters, such as the delivery of affordable housing, open space and play provision, education contributions and highway contribution requirements.	Noted. Viability is always considered by the LPA in accordance with the NPPF.
	To require all ‘major’ development schemes across the City to make a financial contribution towards public art or conservation of a public heritage asset is overly onerous.	Noted.
	The policy or the explanation should ensure the new or emerging communities have a chance to comment on any art, it's commissioning and installation. Waiting till the development is occupied will allow the new residents to partake in the process and have a sense of ownership, without feeling subjected to historic public consultations.	Noted. An important point to be considered and incorporated where appropriate.
G9: Community safety	As with Policies G1, G3, G9 and G16, the policy should begin ‘development proposals should not harm . . .’	Noted.
G10: Delivering strategies	The policy should be deleted because it repeats other strategies and is vague and unclear referring to ‘taking every viable opportunity’.	Noted. Further consideration to be given to this policy.
G11: Development alongside main	Request that this policy is extended to include development at key locations along the canal and river, which act as a main route into the city for pedestrians, cyclists and boat traffic. As these types of traffic are moving more slowly poor quality development has a bigger impact as visible for a longer period of time. Development should interact with the towpath and waterspace not turn its back to provide a frontage elsewhere. This would be particularly important in the Bristol road area where any	Noted. Policy to be expanded accordingly.

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routes	development opportunity should pay attention to views from the waterway as well as the road frontage.	
G12:	This is a statement and not a policy and should be deleted.	Noted.
Design standards	Design are somewhat subjective and it would be difficult to measure success or failure as part of any future monitoring	Noted.
G13: Large-scale 20 th century buildings	This policy has the same wording as policy G11 Noted.	Noted. This was a publication error.
G14: Transport arrival nodes	It is not clear what transport arrival nodes are. They are not defined or listed in the supported text or shown on the proposals plan.	Noted. Transport arrival nodes to be listed.
G15: Gulls	The Trust recognises the problems which gulls can cause within the City but it is important in the rationale to explain the reasons behind this problem. Currently the policy addresses the symptoms without giving recognition to the cause – see full comments for causes.	Noted. Supporting text to be expanded where appropriate.
	Given the presence of an SPD we do not feel that this topic requires a specific policy.	Noted.
	It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted	Noted.
G16: Design and climate change	The policy should begin ‘development proposals should achieve...’	Noted. Policy to be edited where appropriate.
	It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted.	Noted. Further consideration to be given.
G17: Views of the Cathedral	This policy would be better placed in the Historic Environment Chapter.	Noted. Consider relocating policy.
	The policy should begin ‘development proposals should not harm . . .’	Noted. Policy to be edited where appropriate.
H: Sustainable Transport	Key Issues – a key issue that should be included is the lack of direct rail services to the north and south west of the country on the current Cross Country franchise. A city the size of Gloucester needs greater connectivity to the north and south west rail corridor to encourage tourism and improve economic activity and opportunities for residents.	Noted. This is a matter for Network Rail and the individual train service operators.
	Key issue is the need to improve access for cyclists and pedestrians from the city centre to the hospital and surrounding area through improvements to the railway station. The references to station improvements throughout the Plan are welcomed particularly the need to improve the subway and improve access from across the city centre but should be flagged up as a key issue that needs addressing.	Noted. Some technical work is currently underway to assess how this important link can be improved.
	The following minor amendments need to be made: Other relevant strategies should include	Noted. Change to be incorporated.

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	Gloucester Railway Station Travel Plan January 2016 which I can provide in due course.	
	The city needs a park and ride on the east side of the city.	Noted. This is a matter for the County Council and Highway England. Further information can be found in the Gloucestershire Transport Plan http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/
	Lack of disabled parking in the main docks area – eg: Vinings restaurant unusable.	Noted. The Docks is a private space. Comment to be based on to the relevant land owner.
	Making the city more walkable – protecting pavement areas from traffic with on street parking designed between the road and the footway to protect pedestrians.	Noted. Reference to on-street parking to be added to the car parking policy G2.
H1: Sustainable transport	<p>The document identifies poor access to the canal frontage as a key issue along with traffic congestion along some key routes, including Bristol Road. Pleased that the council recognise that improvement needs to be made to ensure that better use is made of the canal towpath as a sustainable transport route. With increasing populations at Hunts Grove and Kingsway the towpath could become a more useful link, particularly if linkages and access to it are also improved and way marked. Improvements to the towpath could of course also help congestion on Bristol Road if more people utilised the canal towpath as sustainable route into the heart of the city.</p> <p>It is clear however that increased usage of the towpath as a sustainable transport route will cause faster degradation and could result in increased maintenance costs for the Trust, however we are currently discussing this issue with the County Council Highways Team and hope that S106 money can be spent on improving certain sections in the future. We therefore support Policy H1: Sustainable transport, but ask the council to recognise that there may be a need for mitigation or improvement must be dealt with by S106 or Cil to ensure that a development does not inadvertently worsen existing provision as a result of increased usage.</p>	Noted. The LPA will await advice from Highways on the requirement for contributions towards the maintenance of towpaths. The LPA will continue to notify the Canal and Rivers Trust on applications in close proximity to the canal.
	Improve rail links to other cities, especially Bristol. At present it is faster by moped.	Noted. This is a matter for Network Rail and the individual train service operators.
	Major bus service route and stop upgrades required throughout Gloucester City with RTPI stops, new shelter and raised kerb stops, as well as footway widenings, upgrades and tactile crossings throughout inner Gloucester and tree and landscape improvements. New and improved pedestrian and cycle canal side continuous routes between city centre and south and north edge of Gloucester. New Cycle Lanes and junction giveaway lines on highway removing footway cycling.	Noted. This is a matter for the County Council and Highway England. Further information can be found in the Gloucestershire Transport Plan http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/ . The LPA will continue to work with Highways to negotiate contributions to highways infrastructure through the development management process.
	As a regular road cyclist most cycle infrastructure isn't suitable as it is too narrow, too slow, too bumpy etc so I use the normal road network. However certain junctions feel very exposed and	Noted. The LPA will continue to work with Highways to negotiate contributions to highways

3.0 Development management policies – Summary of Comments	Response
<p>dangerous on a bicycle. In particular I would like to see the simplification of Westgate Road Gyrotory and removal of through route between Quay Street and the roundabout to reduce through traffic in the city and make it more cycle friendly. (This will also remove a lot of the traffic from Kimbrose Triangle)</p>	<p>infrastructure through the development management process. We are supportive of improvements to Quay St, Priory Road and Westgate that would significantly improve the pedestrian and cycle network.</p>
<p>The first paragraph is a supporting statement and should be removed from the policy. The first sentence of the second paragraph merely refers to other guidance and is unnecessary to include in a Local Plan Policy.</p>	<p>Noted. Policy to be amended.</p>
<p>Highways England welcomes the opportunity to comment on the Draft Gloucester City Plan (the Draft Plan). We are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which around Gloucester comprises the A40 north of Gloucester and the M5, J11, J11a and J12. It is on the basis of these responsibilities that our response to the Draft Plan is provided.</p> <p>Highways England recently provided a consultation response in respect of the Gloucester City Infrastructure Delivery Plan Project Briefing Pack January 2017 (dated 9 February 2017). It is recommended that the comments provided for that consultation are considered further alongside our comments set out below.</p> <p>Scope of the Gloucester City Plan</p> <p>We understand that the Gloucester City Plan (GCP) will cover the administrative area of Gloucester only, to identify where and how new development will take place within the City’s administrative boundary to deliver the City Vision and to deliver the housing and employment requirements set out in the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (JCS).</p> <p>The Draft Plan outlines that the City Plan will support the delivery of the JCS, which sets the strategic vision for the three authority areas. The GCP will sit beneath the JCS as a separate document but the two will be interrelated.</p> <p>Paragraph 1.10 of the Draft Plan states:</p> <p>Together they will provide an up-to-date and comprehensive planning policy framework and will replace the Council’s adopted Local Plan from 1983 and interim versions of plans thereafter... Once adopted, the GCP will be used to assess planning applications and ensure that development proposals contribute to delivering new development that positively contributes to delivering the vision for Gloucester.</p>	<p>Noted. The LPA will continue to work with Highways England in the development of the transport evidence base for the CP.</p>

3.0 Development management policies – Summary of Comments	Response
<p>The JCS sets out the strategic planning framework for the three Councils including the strategic land allocations across the JCS area and high-level development management policies. The City Plan will provide a range of locally specific land allocations covering the remaining housing need within Gloucester (excluding the Strategic Allocations).</p> <p>City Vision</p> <p>The locally specific vision for Gloucester is designed to support and expand the JCS Vision, the 3 supporting ambitions and 9 strategic objectives, to provide a planning framework that addresses the local issues in the City. Highways England welcomes the locally-chosen City Vision, although we note that no specific reference is made to sustainable transport or the provision of transport infrastructure within the five key aims. The JCS Ambition 3, strategic objective 7 does seek to provide a healthy, safe and inclusive community by promoting sustainable transport across the three Councils.</p> <p>Policy Context</p> <p>The National Planning Policy Framework</p> <p>The National Planning Policy Framework requires that local planning authorities should work with other authorities and providers during the plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands (para 162).</p> <p>The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development (para 181).</p> <p>Pursuing sustainable development requires careful attention to viability and costs. The sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (para 173).</p> <p>To ensure viability, the costs of any requirements likely to be applied to development, such as infrastructure contributions or other requirements should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (para 173).</p> <p>It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion (para 177).</p>	

3.0 Development management policies – Summary of Comments

Response

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe (para 32).

National Planning Policy Guidance

NPPG confirms the importance of local authorities undertaking an assessment of the transport implications of development in preparing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.

The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources.

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms

- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport

- highlight and promote opportunities to reduce the need for travel where appropriate

- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate

- consider the cumulative impacts of existing and proposed development on transport networks

- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands

- identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

The Strategic Road Network and the Delivery of Sustainable Development

Highways England’s policy on the delivery of sustainable development is set out in DfT Circular

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<p>02/2013. In framing its contribution to the development of Local Plans, Highways England’s aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network (para 14).</p> <p>In order to develop a robust transport evidence base, Highways England will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety (para 15).</p> <p>Highways England’s planning guide entitled “The Strategic road network: Planning for the future” confirms that Highways England will work with local planning and highways authorities to ensure that development plans are underpinned by a robust transport evidence base which fully assesses the transport implications of the growth options being considered (page 17). The guide also sets out how Highways England will work with local planning authorities to identify the impact and infrastructure requirements of development allocations (page 17).</p> <p>Where necessary mitigation measures are unlikely to be feasible or deliverable within the plan period, Highways England will work with the local planning authority to revise the site selection process taking account of such constraints (page 18).</p> <p>Gloucestershire’s Local Transport Plan (2015- 2031)</p> <p>Gloucestershire County Council’s LTP was formally adopted in June 2016. Policy LTP PD 4.5 –Enabling development outlined in Gloucestershire County Council’s updated Local Transport Plan states ‘GCC will work with its partners to provide realistic and safe opportunities for travel choice for residents, employers, and visitors to new developments whilst maintaining the safe and expeditious movement of traffic on the local highway network by prioritising investment which seeks to reduce recurring congestion in line with the Network Capacity Management Hierarchy’. The Network Capacity is detailed within the policy.</p> <p>The implementation of this policy will secure future development and growth by delivering a local highway infrastructure that does not act as a constraint to unlocking sustainable development and provides safe, reliable and convenient transport choices connected to new developments.</p> <p>GCP Evidence Base</p>	

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Response

The Draft Plan outlines the importance of a robust evidence base on which to base the City Plan and notes that a number of studies relevant to the GCP have been completed as part of the JCS development process.

However, paragraph 1.20 of the Draft Plan identifies that a number of studies required to support the City Plan remain outstanding, including the Transport Assessment and Modelling and therefore there are gaps in the evidence base.

JCS Transport Strategy

Highways England is currently working with the JCS authorities and Gloucestershire County Council (GCC) in developing the transport evidence base and strategy to support the JCS, including the identification of SRN improvement schemes that will need to be included in the JCS IDP.

Our current position in respect of the JCS evidence base and emerging transport strategy is set out within Exam 233 and 233a of the JCS examination library. In terms of the emerging JCS Transport Strategy, Exam 233 provides a list of locations where highway interventions are needed to support Strategic Allocations and states that:

In terms of the SRN, all junctions, with the exception of M5 junction 12, have been identified as requiring improvement in order to enable Core Strategy growth.

For clarity, in terms of the SRN at Gloucester, the JCS evidence base (to date) identifies that interventions will be required on the A40 at Over roundabout, Longford Roundabout and Elmbridge Court to support the Strategic Allocations to 2031. Interventions will also be required at M5 J10, J11 and J11a. At present, the nature and detail of these interventions remains unclear and further clarification should be sought from the JCS team.

Exam 233a sets out that whilst Highways England were broadly content with the available transport evidence base and the emerging transport strategy supporting the Pre-Submission version of the JCS, the recent consideration of new sites for inclusion through the main modifications process means that the implications for the scale and extent of the JCS transport strategy are not yet fully understood.

The JCS team are currently undertaking additional traffic modelling and assessment work to determine the impacts of the main modifications and the implications for the emerging transport strategy. At this time, it is our belief that this additional work could have significant implications for

3.0 Development management policies – Summary of Comments	Response
<p>the shape of the emerging transport strategy, including the need for intervention at M5 J12.</p> <p>Conclusion and Next Steps</p> <p>Whilst it is acknowledged that there is a significant interrelationship between the JCS (and associated evidence base) and the GCP, the Draft Plan proposes additional housing and employment allocations in Gloucester, over and above that proposed in the JCS and currently being tested in the JCS traffic modelling.</p> <p>Evidence will therefore need to be prepared to confirm if additional mitigation, over and above that identified in the JCS will be required to additionally support the site allocations proposed in the Draft Plan. We also understand that GCC Highways is progressing an improvement scheme at the Over Roundabout to help relieve capacity issues on the A40 at peak times. However, it is not yet clear whether this scheme is sufficient to accommodate the future growth proposals set out within the JCS and Draft Plan.</p> <p>Until such time as the GCP Transport Assessment and Modelling becomes available, it is not possible for Highways England to determine the cumulative impact of the Draft Plan on the SRN and confirm whether the Draft Plan is compliant with NPPF.</p> <p>In terms of developing a transport evidence base for the City Plan, Highways England would welcome the opportunity to work with you to ensure that the needs of the plan and relevant policy requirements in so far as they relate to the Strategic Road Network are met.</p>	
<p>Alney Island can be accessed safely only from one small bridge near the docks lock. An additional pedestrian bridge should be built near the end of Westgate Street.</p>	<p>Noted.</p>
<p>Follow up on proposal for removing central reservations along Quayside and introducing coach parking. Even if this was a short term measure this would immediately resolve some of the shortages.</p>	<p>Noted. There is ongoing work underway to assess the current and future parking needs for the City.</p>
<p>Until there are too many electric cars in Gloucester for it to be feasible – shameless favouritism of the electric car. Free Parking with charging point. Use of bus lanes. Because although it is unfair it is also unfair that electric car drivers have to suffer the effects of other drivers air polluting cars.</p>	<p>Noted. The LPA recognises that more could be done to promote the use of electric cars, especially as the city has three AQMAs. Air pollution is a local, national and international environmental and health concern. An Air Quality report is currently being drafted by the council and will be available in due course. More information with regard to air pollution can be found at http://www.gloucester.gov.uk/resident/pests-pollution-and-food-hygiene/pollution/Pages/Air-</p>

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		Quality-in-Gloucester.aspx
I: Infrastruct ure	We welcome the inclusion of flooding infrastructure in this section. We are not sure of the current situation that the Council is at with regards to the specific projects mentioned (Blackfriars; Quayside flood alleviation; Housing Zone), and it may be worth re-visiting these before finalising the Local Plan wording. Policy I1 makes comment on new flood defence infrastructure within the city, there may also be the potential for the removal of, or adjustment to, historic infrastructure (such as redundant structures, old railway lines, etc) to provide wider benefits to the area of Gloucester.	Noted.
	The words ‘flood defence infrastructure’ should be changed to food risk management infrastructure, as this can include ‘hard’ defences, but also ‘softer’ options such as property level protection, conveyance and storage schemes, and flood warning systems including the gauges needed to support them.	Noted. Change to be incorporated.
	<p>Allocations: We would seek confirmation of what evidence base sources/ data sets have been used when considering site allocations. We would expect flood risk to have been taken into account (see comments on evidence base and Level 2 SFRA), but in addition the sites should have been ‘sifted’ for environmental constraints including:</p> <ul style="list-style-type: none"> • potential land contamination (such as former/historic landfill sites, sites with Environmental Permits for waste activities, and consideration of proximity to railways/roads where construction of the infrastructure may have resulted in tipping of soils/waste historically), • presence of watercourses including culverted watercourses, groundwater sensitivity (i.e. aquifers; there are no Source Protection Zones in Gloucester, but there may be private abstractions potentially), • the presence of Permitted sites/activities (under the Environmental Permitting Regulations) such as industrial processes that might affect amenity, • the status of waterbodies under the WFD. (Incidentally all river water bodies in Gloucester are not currently meeting the required ‘good’ status of the WFD as they are at ‘moderate’ or lower. Thus they require improvement and opportunities to do this through development should be sought.) <p>Of the allocation sites proposed, the following are the only ones with fluvial flood risk issues attached to them. (Please consult with the Lead Local, Flood Authority – LLFA – regarding other sources of flooding such as surface water or groundwater flooding.)</p>	Noted. The allocations were sifted for constraints. Detailed heritage assessments were completed on a number of the sites. Further evidence will be gathered prior to the next version of the CP. This will include the completion of SFRA Level 2 across all sites.
	Support infrastructure and not just wanton development.	Noted.
	Relevant National Planning Policy Framework paragraphs should also include: Chapter 1, 4, 5 and 7. Relevant policies from the JCS should also include: SP2, SD1, SD4 and SD5.	Noted. Changes to be incorporated where appropriate.
I1: Infrastruct ure	When planning for new settlements, the Council should ensure that they work with NHS commissioners (Gloucestershire CCG & NHS England) and providers to ensure that adequate healthcare infrastructure is provided to support new residential development.	Noted. This does already happen. Officers have met with representatives of the GCCG at all stages of the plan making process.

3.0 Development management policies – Summary of Comments		Response
	<p>Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The Council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable.</p> <p>Where new, improved, or extended health facilities are required to mitigate the impact of new development, health commissioners would require Section 106 / CIL funding towards the capital cost of delivering this infrastructure. An assessment of the appropriate mechanisms for delivering the required funding will need to be undertaken at an early stage in collaboration with the Council.</p>	<p>Noted. Officers have met with representatives of the GCCG at all stages of the plan making process. We have encouraged the NHS to provide details of their future spatial requirements but it has not been possible for them to provide us with this information. Unfortunately the commissioning of health care does not appear to be forward planned in the same way as the planning process. GP practices/dentist etc appear to rely on private individuals stepping forward to begin a practice. They are not actually built in advance by the NHS, but rather run more like private businesses.</p>
	<p>Improvement of Gloucester Railway Station and perhaps (very long term) introduce tram-trains to improve linkages between Gloucester and Cheltenham. Much of the formation of the Golden Valley Line was 4 track and thus there is space to provide 2 further tracks. On and off-road running would be used to complete the network. A full aspirational route could run from Quedgeley through to Pittville Area in Cheltenham</p>	<p>Noted. This is a matter for Network Rail and the individual train service operators.</p>
	<p>Concern that the infrastructure requirements arising from new developments are properly considered and addressed, particularly highways, schools and healthcare.</p>	<p>Noted. We have an open dialogue with the NHS and the Local Education Authority. We have offered to accommodate their needs for future expansion of services within the plan. However they operate on a reactionary basis rather than a forward planning basis. This is partly to make best use of resources. It would for example be a waste of money to build a primary school in advance of having a population ready to occupy that school. A new development may not generate enough children to support a school or the children may not be a primary age etc. The LPA will of course support applications from education and health providers that comply with the local plan policies.</p>
I2: Schools and other educational needs	<p>Any sports and play areas should be accessible for disabled children and young people and include play equipment suitable for disabled children and include a Changing Places toilet and changing space in sport/ leisure development (see below).</p> <p>Thousands of people with profound and multiple learning disabilities, as well other disabilities that severely limit mobility, cannot use standard accessible toilets.</p>	<p>Noted. Consideration to be given to expanding the policy.</p>

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	<p>People may be limited in their own mobility so need equipment to help them or may need support from one or two carers to either get on the toilet or to have their continence pad changed.</p> <p>Standard accessible toilets (or "disabled toilets") do not provide changing benches or hoists and most are too small to accommodate more than one person. Without Changing Places toilets, the person with disabilities is put at risk, and families are forced to risk their own health and safety by changing their loved one on a toilet floor. This is dangerous, unhygienic and undignified.</p> <p>It is now accepted and expected that everyone has a right to live in the community, to move around within it and access all its facilities. Government policy promotes the idea of "community participation" and "active citizenship," but for some people with disabilities the lack of a fully accessible toilet is denying them this right.</p> <p>Although the numbers are increasing, there are still not enough Changing Places toilets across the country, and Gloucestershire has very few at all.</p> <p>Providing these toilets in public places would make a dramatic difference to the lives of thousands of people who desperately need these facilities. Information on Changing Places can be found here: http://changing-places.org/</p>	

Site Allocations - Comments		Response
General comments	It was raised that 'site specific requirements' should be changed to read 'site specific requirements subject to viability'.	Noted. Consideration to be given to suggestion.
	The delays to the adoption of the JCS could jeopardise the City's housing land supply provision, therefore sustainable developments within the City boundary, especially those identified as an emerging allocation in the City Plan should be actively encouraged and supported by the Council, to ensure that housing provision is being delivered to meet local housing need.	Noted.
	Some of the sites included appear to have significant constraints in terms of being playing pitches or archaeology. The council's assumptions about the suitability, availability and deliverability of allocated sites are not robust.	Noted. Constraints have been considered and further evidence gathering is underway on some sites.
	The GCP includes a significant number of allocations that will have a direct and indirect impact	Comprehensive historic assessments have been

Site Allocations - Comments	Response
<p>on the significance of national, known and unknown, designated and undesignated heritage assets. Mindful of the national importance of historic Gloucester, can the GCP include site specific safeguards in the form of key design principles.</p> <p>Relevant national heritage policy considerations include, that:- Great weight should be given to the conservation of heritage assets (NPPF Paragraph 132); Special regard must be given to desirability of preserving the setting of a listed building in the exercise S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990) and S72 re Conservation Areas; Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal (NPPF Paragraph 129); Harm should always be avoided in the first instance. Only where this is not possible should mitigation be considered (NPPF Paragraph 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm. That the strategic allocation is consistent with the GCP's positive strategy for the conservation and enjoyment of the historic environment; conserving heritage assets in a manner appropriate to their significance (NPPF paragraph 126).</p>	<p>completed on the majority of sites. These assessments are available on the website. http://www.gloucester.gov.uk/resident/planning-and-building-control/planning-policy/Pages/Evidence-Base.aspx</p> <p>Heritage policies have been drafted in accordance with the NPPF.</p>
<p>Can the City Council make available the Historic Environment Assessments of the proposed site allocations and be able to demonstrate that the allocations would be in accordance with national policy for the historic environment i.e. the allocations and the related critical key design principles will result in the conservation (protect and enhance) of the significance of the affected heritage assets and a coherent historic city/townscape?</p>	<p>Noted. These assessments are available on the website. http://www.gloucester.gov.uk/resident/planning-and-building-control/planning-policy/Pages/Evidence-Base.aspx</p>
<p>As decisions will be expected to be made in accordance with the development plan it will be vital for the city council to demonstrate that the quantum of development (numbers and floor area) in the proposed allocations is compatible with its design and heritage policies, and that national policy expectations can be met.</p>	<p>Noted.</p>
<p>Error or colour on plan. Employment commitment at Monk Meadow should be coloured as residential as per the outline renewal 14/00709/FUL</p>	<p>Site allocations plan to be amended.</p>
<p>It has been requested that the Proposed Site Allocation Plans be updated to remove the Sainsbury's store car park at Gloucester Quays from any 'allocation' or 'commitment' shown in this area.</p>	<p>Site allocations plan to be amended.</p>
<p>The Twigworth strategic site does not seem to feature on the Proposed Site Allocations Map even though its contribution has been included in the City Plan's housing supply calculations. For completeness and to afford consistency with the depiction of other strategic sites,</p>	<p>Noted. All neighbouring JCS strategic sites to be added where they are contributing to Gloucester's housing need.</p>

Site Allocations - Comments		Response
	Twigworth should be added to the map as a proposed JCS strategic allocation.	
	Whilst my Client supports the identification of the entire land holding at Winneycroft Farm as a JCS strategic allocation on the emerging City Plan Proposals Map, the table provided at para. 4.10 should be amended to list the contribution of each strategic allocation is envisaged to make to meeting the City's objectively assessed housing need. Such a modest amendment would provide a more positive planning framework for the strategic allocations to be brought forward, in the event that the JCS's adoption continued to be protracted.	Noted. Not deemed necessary.
	Extant permission at Peel Centre for retail should be included as a commitment inline with the approach uses for residential commitments.	Noted. Employment commitments to be added where appropriate.
Supply	There was some confusion raised over the housing supply position as the plan states housing land supply at 13,393 against the 14,359 set out in the JCS. How will this shortfall be met?	<p>The shortage is identified in the JCS Housing Implementation Strategy (HIS). The latest version with appendices and associated documents is available via the link below.</p> <p>http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx</p> <p>Through the JCS Examination Hearing Sessions on the responses to the Proposed Modifications (which commenced on 11th July) the Inspector will come to a view as to the acceptability of Gloucester's shortage and the actions (over the full plan period) to meet the targets set on the basis of need.</p>
	You would like to see a much clearer break down of the housing supply for the City, including the contributions of site allocations to ensure that the plan is transparent and robust and will sufficiently deliver the identified housing need.	Noted. This will be addressed.
	The proposed allocations should deliver 1,937 dwellings in order to fulfil this need	Noted. The 1,937 figure in Table 1 (City Plan Page 79) has an asterisk against it and a full explanation is given as to the reduction from 1,937 to 1,360; the main reason being that a number of large sites that were potential allocations recently got planning permission and so are now recorded as commitments in the trajectory. This process and all the figures are fully explained on pages 13 to 16 of the City Plan Topic Paper 3: Development Needs &

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	Concern that the windfall prediction is ambitious.	Site Allocations. Noted. The anticipated windfall allowance is in line with the agreed JCS methodology. The LPA are doing all it can do identify and allocate as many suitable, available and achievable sites as it can to meet the housing need.
SA01: Land at the Wheatridge	Concerns at the loss of public open space and valuable greenspace.	The site is owned by the County Council and is not a public open space. Access to the site could be controlled by the owner at anytime.
	Concerns about the loss of open space/recreational facility. As well as concerns over the impact on the traffic flow on the junction of Wheatridge East and the Wheatway, along with the associated noise and environmental issues.	The site is privately owned by the county council and is not public open space. Highways, noise and environmental issues will be assessed through the planning process. In the meantime the City Council has instructed a refresh of the Phase 1 Habitats Survey.
	Preferred option for a School to be built (not mentioned in the plan)	Page 83 of the CP sets out the option for educational use.
	Loss of nature corridor and a bridleway	These issues would normally be addressed through any planning application process. Green infrastructure will need to be an important consideration.
	Support development at the Wheatridge – it is currently a big dog toilet.	Noted.
SA02: Barnwood Manor, Barnwood Road	This open space must be kept for the peace of elderly inhabitants close by, and the proximity of the listed building would spoil its setting.	Noted. These issues would normally be addressed through any planning application process. Policies are in place to protect amenity and heritage assets where appropriate.
	Barnwood Manor – Wotton Brook – FZ3 & 2. Provision of an appropriate easement either side of main-river not mentioned in the constraints	Noted. Constraint and requirement to be added.
SA03: Gloucester Mail Centre, Eastern Avenue	Site is potentially suitable for a wider range of uses than is currently proposed and that the draft accompanying wording to the allocation is overly restrictive. It is suggested that the accompanying wording is amended to read: “The site offers the opportunity for redevelopment in whole or in part to provide for different forms of employment-generating	Noted. B uses are suggested as the site is not deemed suitable for residential use or town centre uses. Planning applications for other uses would need to be subject to a sequential test in accordance

Site Allocations - Comments		Response
	uses (B use and non-B use classes).”	with the NPPF and are unlikely to be supported.
SA04: Helipebs, Sisson Road	In support of the proposal subject to there being alternative industrial land available for relocation.	Noted.
	Would take away the problem of articulated lorries using Sisson Road along a narrow residential street.	Noted.
	Existing employment sites should be retained until it can be robustly demonstrated that they are surplus to requirement, this has not been done.	Noted. Further work is being undertaken on Gloucester’s employment provision. This emerging evidence base will be used to assess whether or not the site should be protected for employment or allocated for residential.
	Loss of the adjoining site to residential development could stifle the expansion of neighbouring company and limit future job creation and may ultimately lead to a move away from Gloucester.	Noted. Further work is being undertaken on Gloucester’s employment provision. This emerging evidence base will be used to assess whether or not the site should be protected for employment or allocated for residential.
	Contamination is likely to be a significant factor, as is proximity to railway line.	Noted.
SA05: Allstone site, Myers Road	Nothing about the likelihood of an alternative site being found for the existing use. A much greater degree of certainty about the availability of Site SA05 is required.	Noted. The owner of the site has submitted it to the CP process as being available for development. They have not asked the CP process to assist them in finding, or in allocating them a new site for their current use.
	Concerns about the suitability of the site for residential use because of potential problems of noise and vibration.	An appropriate noise survey would normally be required as part of the planning application process. This allows for appropriate mitigation to ensure that noise levels within properties are of an acceptable level.
	This is an ideal site for 250 dwellings, which I support. The current industrial uses are inappropriate in an urban environment close to residential properties, the hospital and a primary school. The change of use would reduce noise and dust pollution and also remove the heavy vehicle movements that take place along Horton Road.	Noted.
	Allstones, Myers Road – Wotton Brook - within 8 metres of main-river, opportunity for floodplain creation to further minimise flood risk to development opposite again these are not included within the constraints for the site.	Noted. Constraint and requirement to be added.

Site Allocations - Comments		Response
	We would also highlight aspects to consider regarding potential land contamination for Allstones, Myers Road – waste site that may have given rise to contamination.	Noted.
SA06: Former Civil Service Club off Estcourt	The Council are currently considering a planning application for this site (application reference 16/00968/FUL) which proposes to deliver 89 dwellings, on-site Public Open Space and a financial contribution towards off-site playing pitch provision.	Noted.
	The Partnership supports in principle the Council's aspirations for this site in terms of the number of dwellings and the balance of land uses. However, the Council's approach must be realistic. We think that the future of the site is more likely to be determined by the planning application process than by the development plan process. At the time of writing we do not know when the current application by Redrow Homes will be taken to Committee, but independently of that we have already reached the point where the applicants could lodge an appeal against non-determination if they so wished. In addition, the final clause in the last sentence of the site description and overview is wholly inconsistent with the proposed allocation and the site-specific requirements. For this reason, the approach to this site is inadequate even if there were no planning application awaiting determination.	Noted. Whilst the site allocation does vary from the current application it is important to note that the allocation considers the fact that the site is currently private playing fields. To allocate the site for a quantum of development to match the application would be inconsistent with the council's policy to protect the provision of playing fields.
	Even if the Council's view on the amount of residential development prevails, the City Plan gives no indication of the disposition of development on the site. This will no doubt be a source of concern to those whose properties adjoin it.	Noted. The nature, style and design of the site would be a matter for the owner of the site to submit to the council as part of the planning application process. Policies are in place nationally and locally to ensure that schemes such as this are designed in such a way that they protect the amenity of local occupiers and the character of the area.
	The description refers to the (former) access off Estcourt Road but says nothing about the appropriate location of an access to serve the proposed dwellings. This is a significant omission. We therefore object to this policy/proposal as depicted on the Proposals Map on the grounds that it does not show the disposition of proposed uses on the site. More generally, the Plan should contain individual maps at larger scale for all of the larger proposed allocations where more than one use is proposed.	A local plan would not normally specify detailed design or access arrangements for site allocations of this nature. In the majority of cases this is a matter for the developer to initiate after giving due consideration to the site constraints. The planning officers and specialist consultees would then scrutinise the submitted evidence, provide a professional opinion and then negotiate matters to ensure the best possible outcome for the site.
	Maximum number of dwellings (20) is a suitable maximum. Concerns at loss of public open space if this number were to be raised. This is former sports playing field and the rest of land should be retained for sport and recreation.	Noted. This is the current suggestion in the CP.

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	Strongly support new open space with formal sports provision and neighbourhood play area for children.	Noted.
SA07: 67-69 London Road	We hope that the Plan means what it says and that redevelopment does entail demolition and rebuilding, so that a building of a quality appropriate to a Conservation Area will result. We are willing and able to assist the Council in the production of a development brief for this site which would have the status of a Supplementary Planning Document. In the meantime we raise an objection to this policy/proposal on the grounds that it makes no reference to a requirement for a development brief	Noted. The offer of assistance to produce an SPD for this site is appreciated. However resources are simply not available for the council to produce SPDs for individual sites, especially sites of this nature that are relatively small in scale and lacking in complexity redevelopment issues. We would however support the community in any positive engagement they are willing to undertake in order to deliver appropriate development on this site such as a Neighbourhood Development Order.
	Support for the demolition and conversion of these buildings for residential development. Thirty dwelling units would be ideal. The council should consider using Compulsory Purchase Powers to deliver such a project if negotiations fail to achieve development. The property is in a conservation area.	Noted. The council are not in a position to be able to compulsory purchase a site of this nature. CPO are used only in extremely special circumstances and usually to bring together much larger and complex sites or major infrastructure that could not progress without a CPO in place. The council would provide the necessary support the community should they wish to exercise their rights under the Localism Act to produce a 'Community Right to Build Order'.
SA08: Wessex House, Off Great Western Road	The Plan should be clearer about its likely use. Connectivity to the city centre cannot reasonably be described as poor simply because the adjacent underpass is unattractive. If however the redevelopment of this site offers the opportunity for the permanent improvement of the underpass, this should be taken.	Noted.
	Concerns about the suitability of the site for residential use for reasons of potential problems of noise and vibration	Noted.
	Strong support for redevelopment and of improvements to the station underpass.	Noted.
SA09: Great Western Road Sidings	Requires a development brief, as it is a key gateway to rail travellers.	Noted.
	The constraints for this site should include biodiversity. It is known from previous developments here that biodiversity is a major issue.	Noted. Further work to be undertaken on biodiversity.
	Strong support for University Technical College and major improvements to station underpass.	Noted.

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SA10: Land off Leven Close	Should be allocated for 10 rather than 20 dwellings, want to see the maximum amount of open space left for the public to enjoy.	Noted.
	This site should be retained as a playing field. Access off Paygrove Lane may cause a traffic hazard very close to the infant's school.	Noted. The owners of the site has stated through the SALA process that they wish to develop the site. Gloucester has a shortage of housing and must consider all available sites to help contribute to meeting that housing need. Highways England will be consulted on any planning application and will look at highway safety.
SA11: Land adjacent to St Aldates	This community facility must be kept, and the parking availability is essential, as is retention of trees <i>[and]</i> open space.	Noted.
SA12: Blackbridge Sports Hub	Public access must be maintained, and a large area set aside for dog-walkers.	Noted.
	The Crypt School is currently at advanced planning for the development of a primary school with two classes per year. There are two sites identified for the potential construction of the new school. One is within the current grounds and the other is on site 12, Blackbridge. If the school is built within the current grounds of the existing Crypt School there will be a loss of playing fields which potentially will need to be replaced to comply with Planning Policy Guidance 17: Planning for Open space, Sport and Recreation and Sports England Guidelines.	Noted.
	Recommendation: References to the sports hub in City Plan acknowledge and explicitly state the need for any such sports hub to have shared usage with the Crypt school.	Noted. It is not considered appropriate to include this level of detail in the planning policy.
SA13: Land East of Waterwells Business Park	There was support for the allocation of this site for residential use.	Noted.
	It was suggested that the text should state that the proposed employment uses within the allocation should only be brought forward if compatible in amenity, design and environmental quality terms with the adjacent residential allocations to the south.	Noted.
	It was also suggested the policy text associated with proposed allocation SA13 should be amended to remove the existing reference to '150 dwellings' as it implies a fixed marker. This will, however, need to be informed as a result of detailed design considerations. However on the face of it a total figure of 150 dwellings over 6 hectares appears to be reasonably low for this location (circa 25 dph), especially noting that initial draft layouts on the western parcel indicate scope for over 35 dph on the 3.1 hectare land parcel. It is therefore considered that reference should be made to a greater figure than 150 dwellings, subject to further site	Noted. 150 is an indicative figure and a fairly conservative estimate. The SALA estimates 150 to 200 on this parcel. The LPA would welcome an appropriate figure from the landowner/agent based on an initial layout and design considerations.

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	capacity and technical constraint review' within the policy text.	
	Further clarification was sought with regard to the split of on-site provisions of POS etc across the various parcels.	Noted. This will be in accordance with the relevant SPD. The split will need to be determined through the pre-app or application process.
	It was noted that none of the site, according to EA's Flood Map and the Council's Strategic Flood Risk Assessment Level 1, actually lies in the Flood Zone 2 &3 so the reference to flooding as a constraint should be removed.	Noted, this has been checked and this constraint will be removed.
	Consideration to be given to Dimore Brook Ordinary Watercourse.	Noted.
SA14: Clearwater Drive	New schools in Quedgeley should be built to the east of the A38 Bypass and not at this location. The land should be considered as formal public open space.	Noted. The land is in private ownership and is not public open space. It is not possible for the LPA to allocate privately owned land as public open space.
SA15: King's Quarter	The central King's Square must be an open, green space with seating as a relaxing hub in the middle of a busy shopping, restaurant area with accommodation above the units.	Noted.
	Strong support for the King's Quarter regeneration project, including the new bus station. Concern that progress seems to have slowed and that it might not happen at all.	Noted. Updates on the progress of the bus station redevelopment are available on the City Council's website. Progress is currently as expected and due to complete on time in Sept 2018.
	Kings Quarter – River Twyver – culverted watercourse not included within the constraints – opportunity to open up this section of culvert should be taken.	Noted. Constraint to be included.
SA16: Greater Blackfriars	It is noted that Table 2 identifies site SA16 would deliver in the order of 50 dwellings. This would appear to be an error and should have referred to 400 dwellings.	Noted. 400 is the correct figure.
	River Severn – Flood Zone 3 & 2 – depending on details this site may not correspond with the policy principles set out within the Draft Local Plan.	Noted. More details to be sought from Environment Agency on this matter.
SA17: Southgate Moorings	We would wish to ensure that any proposed development properly considers the impact on the moorings by virtue of noise, overshadowing, overlooking and amenity issues.	Noted. These issues would be assessed through the planning application process.
	Evidence gathered identifies this as the ideal place for a city centre iconic multiuse venue for performances, conferences and exhibition. Evidence shows that capacity should be 1200 seating with 1800 standing in order to be sustainable. Ground floor facing Paju walk should consist of bars and restaurants. There is also possible space for a 120 room 4 star hotel to go alongside.	Noted.
SA20: Land at St	The plan should be amended to include commitments identified by the JCS retail study 2011-2013. As follows: 'redevelopment to provide for 4683m2 of comparison floorspace and	Noted.

Site Allocations - Comments		Response
Oswalds	4733m2 of convenience floorspace'.	
	Please revise policy to ensure that all provision of public open space is on site. There is a lack of green space on the current development and this does need to be addressed.	Noted.
	Support for the redevelopment of land to the rear of Tesco for residential.	Noted.
	Requirement for disabled access onto the neighbouring open space should be sought.	Noted.
	Consideration to be given to River Severn/River Twyver – Flood Zone 2 and site within 8 metres of main-river.	Noted. Constraint and requirement to be added.
We would also highlight aspects to consider regarding potential land contamination for Land at St Oswalds – historic landfill and complex arrangements in place through previous planning applications to ensure drainage pipes do not exacerbate contamination issues.	Noted. Noted. Constraint and requirement to be added where appropriate.	
SA21: Former Town Ham Allotments, off Westend Parade	Consideration to be given to River Severn – Flood Zone 2.	Noted.
SA22: Secunda Way Industrial Site	No further infill here, as too close to existing properties and is too close to Hempsted village.	Noted.
SA23: Rea Lane	You suggested that this site should be removed from the NIA designation.	NIA's are not designated through the CP. They are 'recognised' by the Local Nature Partnership. As such the CP can not remove sites as a NIA. NIA's are not strict barriers to development. They are priority areas offering good opportunities for ecological network restoration and improved habitat management. This work can sometimes be realised through the development management process.
	Requirement for a Phase 1 Habitat Survey and Landscape Assessment for this site.	This has previous been undertaken on behalf of the council and again as part of a submission to the council.
	Confirmation that the land is available for development and can be delivered in 5 years. Application for 30 dwellings submitted (allocated for 35). Delivery at maximum density may be challenging.	Noted.
	The site (SA23) assists in making the City Plan more legally compliant and sound than it would be without the allocation, but the concern nevertheless is that plan is unsound due to lack of	Noted.

Site Allocations - Comments		Response
	flexibility.	
Site submissions for consideration	Promotion of Winnycroft Lane	Noted.
	Promotion of 'Land at Mill Place' as allocation	Noted.
	Submission for consideration of land at Snow Capel farm	Noted.
	Submission for the consideration of Land off Rudloe Drive to be considered for residential instead of employment in order for the city to meet its five year land supply.	Noted.
	Submission for consideration Land off Forest View Road Tuffley, on behalf of Terra Strategic Ltd	Noted.
	Request for Land south of Grange Road to be considered as an allocation rather than commitment	Noted.
	Request allocated sites to include new residential dwelling site to brownfield site at corner of Cecil road and Wilton Road in Linden, Gloucester.	Noted. This site is too small to be considered for an allocation. The suitability of this site for residential can be discussed through the Pre-application or planning process.
	Other possible site for housing in the Kingsholm & Wotton County Division. 1. The bus depot in London Road would make an ideal site for housing and would be planning gain within a conservation area. 2. The former gas-holder site on Horton Road would also be good for housing as would be the 2Together land between the Aspen Medical Centre and the petrol station on Horton Road	Noted. The bus depot is operational and not available for other uses. The former gas holder site on Horton Road is not likely to be suitable due to land contamination, but National Grid have been contacted to get confirmation and further information. The NHS have been contacted on previous occasions regarding their land holdings and have not indicated that the land between the Aspen Centre and the Horton Road petrol station is available. 2gether NHS Foundation Trust will be contacted again as part of the annual SALA call for sites.
	Promotion of the Peel Centre and Land at Madleaze Industrial Estate. The Peel Centre has the potential to deliver up to an additional 16,000 sq m gross retail floorspace over the next 15 years in addition to the commitment of 9,518 sq m gross). In respect of the Madleaze Industrial Estate part of the site, this has the potential to provide up to 480 dwellings over the plan period.	Noted.
Promotion of intensification of Westgate Retail Park.	Noted.	

Site Allocations - Comments	Response
	Promotion of Gloucester Golf Course – custom build community
	Noted.

HRA & SA - Comments	Response
<p>Habitats Regulations Assessment (HRA) para 3.15 & Appendix IV – it could be questioned whether increased development in Gloucester could actually result in significant increases in recreational disturbance on the Cotswolds Beechwoods but particularly the Severn Estuary which has features which are more susceptible to such an effect. Reference in the next version of the HRA to the findings of the recent Stroud District Study would be useful as the draft City Plan progresses with more firmed up site allocations and the HRA is updated. The Severn Estuary Visitor Study can be found at https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/evidence-base/environmental-evidence.</p>	<p>Noted. Growth in the CP will not exceed the levels of growth expressed and tested through the JCS process. The JCS has set the overall level of growth and a HRA was undertaken during its preparation. The HRA screening of the JCS found that for 12 of the 13 identified European sites there would be no significant effects, although there was some uncertainty regarding the in combination effects on 7 European sites as a result of changes to Air Quality, Disturbance and Water Levels & Quality. There was also uncertainty around the significant impacts that short range atmospheric pollution might have on the Cotswolds Beechwoods SAC. Therefore, an Appropriate Assessment (AA) was undertaken to gain a more detailed understanding of the possible significant impacts which may occur. The AA made a number of recommendations to ensure potential impacts on European sites did not occur, including conducting a transport assessment and a water cycle study, and strengthening the flooding policy. Overall the HRA concluded that with consideration to the recommendations provided, the Draft JCS would not have significant alone or in combination effects on the integrity of the identified European sites. There was some uncertainty raised during consultation and examination by Natural England regarding the potential recreational impacts on the Cotswolds Beechwoods SAC and proposed mitigation measures. However, this has now been resolved through a HRA Addendum Report8 (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and Natural England. No further concerns on the HRA have been raised during examination of the JCS and therefore, it can be concluded that the strategic development</p>

HRA & SA - Comments		Response
		proposed for Gloucester in the JCS will not have adverse effects on the identified European sites.
	<p>The Sustainability Appraisal sets out in Table 2.1 a SA Framework, but this is not used to develop a framework to appraise each policy individually or each allocation in detail. Instead Section 5, the Integrated Appraisal of the Plan provides only a prose description of the impacts on policies, site allocations, cumulative effects and interrelationships.</p> <p>I would be grateful if you would take the above comments into account in progressing the Gloucester City Plan and keep Persimmon Homes Severn Valley informed of its progress.</p>	Noted. Comment to be addressed through next iteration of SA.
	GCP Sustainability Appraisal (2013): Making better use of the waterways and river corridors, including improving flood mitigation and biodiversity resources. H&GCT would have preferred that the scheme was mentioned in the GCT so that it can gauge both public opinion and inform others of the plans	Noted.
	Land at Mill Place and Land off Rudloe Road have not been subject to Sustainability Appraisal by the DGCP. It is submitted that for the next round of DGCP public consultation that both the submitted sites, Land at Mill Place and Land off Rudloe Drive, should be the subject of SA and should be included as sites that have the potential to deliver against the City's housing requirement in the plan period 2011-2031.	Noted. Any new potential allocations will be subject to SA.
	There is lack of clarity over what document the policy is seeking to implement, either the Gloucestershire County Council Green Infrastructure Plan or the JCS Green Infrastructure Strategy. Also we note that neither document is identified in the Sustainability Appraisal list of key plans and programmes.	Noted. Clarity to be provided and relevant documents to be included.

General Comments	Comments	Response
Delivery	Concern was raised over the absence of detail of how the plan will be delivered, in terms of human resources and funding.	Noted. The council is in the process of transformation. An independent review of the planning service and its resources is underway by PAS.
Notification	You would like to have good notification of applications on newly submitted sites.	All applications will be notified on in accordance with the approved....
Pipelines	We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline.	Noted. Consultation is sent for any planning applications in the buffer zone of the pipeline.
Site Allocations	Site allocations should say “Provision of public open space” rather than specifying “play area” etc.	Noted. This will be amended.
Progression of the plan	Concern was raised over the progression of the plan stating that this must be synchronised with the JCS to avoid the risk of undermining the CP.	The council will continue work on both plans and will prioritise the progression of the JCS as the strategic plan for the area. The work and progress on the CP will not overtake the JCS.
Style	Concern that the plan has been written by a number of experts and it needs further editing in order to read as one document with one voice.	Noted. This is a first draft. There is a much more editing and work to be undertaken before a final version is reached.
	Some policies have bulleted lists, other numbers and some don't have anything.	Noted – the next version will have consistency
	Label photographs	Noted – labels to be applied.
Monitoring	You have recommended that the impacts of the Plan on the City's biodiversity resource are monitored.	Noted.
	The Woodland Trust believes that levels of tree cover and woodland protection and creation could be used as key indicators for monitoring the success of the Gloucester City Plan. Gloucester City Council currently has a woodland cover of just 4.1%, with just 4.57% of the local population having accessible woodland within 500m of where they live (Woodland Indicators by Local Authority, July 2016). To achieve its stated objectives of maintaining and enhancing its tree stock, and protective and enhancing its natural environment, these figures could be used as benchmarks for monitoring purposes to demonstrate success.	Noted.
Further evidence base	At the time of writing this representation the City's Economic and Employment evidence base report, to be prepared by Athey consultants has not been published. Pegasus Group, on behalf of Robert Hitchins Ltd, reserve the right to make further representation on the Athey report once it is published if it is to comprise part of the evidence base for the DGCP.	Noted. The LPA will not be consulting on individual pieces of evidence base work. There will however be an opportunity for all interested parties to comment on the CP as it continues its progress through the plan making process.

Other public comments received at consultation events on post it notes –comments relating to specific policy areas or sites have been included in the relevant table above.	Response
Concern at proposed developments at Highnam.	Highnam does not form part of the City’s administrative boundary and therefore outside of the council’s control. The LPA continues to work with neighbouring authorities under the established DTC.
Frustration at the lack of adoption of Longhorn Avenue to the rear of St Oswalds retirement village. It lacks accessibility for older people on mobility scooters because there are no ramps.	Policy team have followed up with County Highways and Asset Management.
Concern regarding the increasing number of homeless people that are on Gloucester’s streets.	Members of the public can refer people they believe to be homeless to P3's outreach team, through www.streetlink.org.uk , downloading the free Streetlink app, or calling 0300 500 0914. All reported homeless persons will be visited by an outreach worker. If you are homeless in Gloucester, you can approach the City Council for housing advice and assistance. Roofless persons who are eligible, unintentionally homeless and in priority need will be offered emergency accommodation. Information is available online, at the Docks, or from a number of independent organisations.
Abbey needs a new community facility or a refurbishment of the existing.	Noted. The upkeep of the building is something that the community will need to explore and work together to achieve. The CP is facilitative of those wishing to develop needed community facilities.
Derelict sites should be forced to pay more taxes to encourage them to be redeveloped. If a site is derelict for 5 years extra charges should apply or the property should be subject to CPO.	
An incentive to give people benefit of the council’s experience of hearing from people who are disappointed with their new build houses. Getting people to think about the drawbacks to parking areas and tiny gardens and no front gardens.	Noted.
More underground car parking outside of the inner ring road.	Noted.
Councillors need to establish their priority list.	The Council are in the process of producing a new Council Plan that will outline its priorities.
Getting the consumers association to investigate the quality of new build houses – standard of insulation. Quality of fittings and finish. Get them to inspect more than 1 in 10 houses for compliance with building regs.	Noted. Officers at public events received complaints about the quality of new build houses. Consumers are concerned that not all new homes have the required levels of insulation. 10 year warranty
B4073 chronic speeding that needs to be addressed.	This is a matter for Gloucestershire Constabulary and County Highways.
What can the council do to increase incentives to develop brownfield rather than greenfield sites?	The Council is required by central government to produce a Brownfield Register by the end of the 2017. The second part of the register will grant planning permission in principle. The Council’s

	Place Team continues to work with land owners to encourage the redevelopment of brownfield sites. The Homes and Community Agency are actively
Safe areas – there is a need for an enclosed lit area for dog owners to exercise their dogs within the city centre.	Noted. Idea passed to parks team.
Abbeymead Avenue needs a bus lane. Has been promised but not delivered. The layout is currently breaking the law.	This is a matter for County Council Highways.
Clock Tower park – nature reserve – what is happening? Badgers and foxes being driven out.	This is not a designated nature reserve. The area is fenced with an open fence to allow for the movement of wildlife. There is no planned development for this area.

Typos	All noted and will be amended.	Amended by
Para 2.5 to 2.30	typo in (16) Gloucester Playing Pitch Strategy 2015 - 2015 should read 2015-2025	
Page numbers	Add page numbers to policies	
Environment policy	Missing 'be' – "RIGS will be re-sited unless it can be shown"	
Environment policy	RIG should be corrected to RIGS	
	Inconsistent paragraph numbering – 1,2,3/ a,b,c etc across policies	
Page 81	Page number missing	
Page 65 & 73	Manual for Streets should it be 2014 or 2016 – inconsistent.	
Glossary	Add RIGS definition 'Planning field' should be 'Playing field' Housing definitions need to reflect Government's White Paper: Fixing our Broken Housing Market (Feb 2017) – 'Home ownership units'	
	Appendix 1 on page 100 the entry for 'Biodiversity Action Plan' is unnecessary and in any case is the definition of biodiversity (which is the glossary item immediately above).	
	Acronym BAP on page 107 – not mentioned in the text and there is no BAP relevant to the City Plan and so entry can be removed	
	Acronym HRA on page 107 – small typo should be 'Habitats'	
Page 56	There is a typo at the bottom of page 56 which refers to the historic environment background topic paper rather than the natural environment one. This can be deleted as the correct sentence is to be found at the bottom of page 57.	
Policy F6	typo in there is an unnecessary extra 'then' after the word 'unavoidable' in the text.	