

Gloucester City Plan

Schedule of Additional Modifications

January 2023

The Additional Modifications below are minor grammatical and spelling errors, and non-material changes that have been made to the plan.

They include those considered as part of the submitted plan by the Gloucester City Plan Inspector (Examination Document CD010e), where not amended by any subsequent Main Modification.

They are expressed either in the conventional tracked-changes form of ~~striketrough~~ for deletions and underlining for additions of text. In the interests of being succinct, only those paragraphs that have been amended are shown within this schedule, i.e. unchanged text paragraphs will not be shown below. Main Modifications are also shown where they are contained within the specific paragraph; further details are available in the Main Modification schedule.

Reference in Main Mods Gloucester City Plan	Pre-Submission text	Additional Modification
Context, paragraph 2.4 Correct % of younger people. Incorrect link to Regeneration and Economic Development Strategy.	The population of Gloucester is relatively young with 24.8% of people being under the age of 19, the highest of all Gloucestershire districts, the South West and UK.	The population of Gloucester is relatively young with 24.8 <u>6</u> % of people being under the age of 19, the highest of all Gloucestershire districts, the South West and UK.
Paragraph 2.7 - Context Additional full stop	Gloucester has a strong and growing economy, being the main economic driver in the county along with Cheltenham, and there are aspirations for major economic growth over the coming years(6). Gloucester is well represented from a strong finance and insurance sector, as well as a growing number of information security, web hosting, IT and defence communications and security businesses(7). The creative community has also grown rapidly in recent years, with Blackfriars and Westgate Street becoming established as a hub for creative businesses(8). The city has a substantial stock of existing employment land which provides for the needs of businesses and offers growth potential; it is important to protect and make the best use of this employment land The JCS identifies a need for 192 hectares of 'B Class' employment land across the three local authority areas. The strategic allocations provide for a significant quantum of this need, but it is important that additional suitable land is identified within the urban area to support the economy.	Gloucester has a strong and growing economy, being the main economic driver in the county along with Cheltenham, and there are aspirations for major economic growth over the coming years(6). Gloucester is well represented from a strong finance and insurance sector, as well as a growing number of information security, web hosting, IT and defence communications and security businesses(7). The creative community has also grown rapidly in recent years, with Blackfriars and Westgate Street becoming established as a hub for creative businesses(8). The city has a substantial stock of existing employment land which provides for the needs of businesses and offers growth potential; it is important to protect and make the best use of this employment land. The JCS identifies a need for 192 hectares of 'B Class' employment land across the three local authority areas. The strategic allocations provide for a significant quantum of this need, but it is important that additional suitable land is identified within the urban area to support the economy.
Context, Paragraph 2.8	Tourism plays an increasingly important role in the city's economy, generating around 5.9 million visitor trips to Gloucester each year, with an annual spend of approximately	Tourism plays an increasingly important role in the city's economy, generating around 5.9 million visitor trips to Gloucester each year, with an annual spend of approximately

Delete additional 'major'	£207m. There are major plans to grow this in future years, capitalising on the city's unique and in many cases world class heritage and culture. Venues such as the Guildhall and Gloucester Rugby provide music, arts and cultural events, however the city lacks a major permanent cultural venue that could regularly hold major events(9). The Docks and canal are assets unique to Gloucester and a major tourist attraction, but which could be capitalised on further, particularly use of the waterspace (10).	£207m. There are major plans to grow this in future years, capitalising on the city's unique and in many cases world class heritage and culture. Venues such as the Guildhall and Gloucester Rugby provide music, arts and cultural events, however the city lacks a major permanent cultural venue that could regularly hold major events9 . The Docks and canal are assets unique to Gloucester and a major tourist attraction, but which could be capitalised on further, particularly use of the waterspace 10
Context, paragraph 2.11 Add reference to add Gloucestershire Health & Wellbeing Strategy 2019-2030 as latest evidence base.	There are pockets of significant deprivation in the city and in some cases, these are worse than the national average. It is estimated that around 20% of children in the city live in poverty. Life expectancy is also lower than the rest of the country. From a public health perspective there are challenges and inequalities around issues such as inactivity, obesity, alcohol related harm, diabetes and drug misuse, suicide and attempted suicide, all of which are at higher levels than the national average. Planning for and developing strong, healthy and vibrant communities are vital in ensuring the physical and mental well-being of the city's residents.	There are pockets of significant deprivation in the city and in some cases, these are worse than the national average. It is estimated that around 20% of children in the city live in poverty. Life expectancy is also lower than the rest of the country. From a public health perspective there are challenges and inequalities around issues such as inactivity, obesity, alcohol related harm, diabetes and drug misuse, suicide and attempted suicide, all of which are at higher levels than the national average. Planning for and developing strong, healthy and vibrant communities are vital in ensuring the physical and mental well-being of the city's residents. <u>13. Gloucestershire Health & Wellbeing Strategy 2019-2030</u>
Development needs and strategy, Paragraph 3.1 Comma instead of full stop in housing requirement Other changes shown are Main Modifications	Policy SP1 – The need for new development': <u>at least</u> 14.359 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, <u>at least</u> 192 hectares of B-Class employment land to support approximately 39,500 new jobs	Policy SP1 – The need for new development': <u>at least</u> 14,359 new homes for Gloucester City and, along with Cheltenham Borough and Tewkesbury Borough, <u>at least</u> 192 hectares of B-Class employment land to support approximately 39,500 new jobs

<p>Development needs and strategy, Paragraph 3.8</p> <p>Spelling error</p>	<p>Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p>	<p>Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed <u>proposals</u> to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p>
<p>Development Management Policies. A: Housing, Paragraph 4.1.1</p> <p>Spelling error – ‘neighbouring’</p>	<p>There is a significant shortage of housing in the UK and this problem has persisted for decades. Not enough homes are being built to meet current or future needs and Gloucester is certainly not immune from this major social and economic issue. Gloucester’s population is growing, but the city is physically constrained by the M5 to the east and floodplain to the west and is not able to meet its housing needs without formal cooperation with its neighboring authorities. Through the adopted JCS the urban extensions to Gloucester (geographically in Tewkesbury Borough) will make an important contribution to meeting housing needs up to 2031. However, further allocations are made through the GCP and it is important that the most effective use of these sites is made of these development opportunities and that residential development delivers the range of housing required to meet the city’s needs. Further information on the city’s housing requirement, delivery and site allocations made through the GCP is provided at Section 4 – Site allocations.</p>	<p>There is a significant shortage of housing in the UK and this problem has persisted for decades. Not enough homes are being built to meet current or future needs and Gloucester is certainly not immune from this major social and economic issue. Gloucester’s population is growing, but the city is physically constrained by the M5 to the east and floodplain to the west and is not able to meet its housing needs without formal cooperation with its <u>neighbouring</u> authorities. Through the adopted JCS the urban extensions to Gloucester (geographically in Tewkesbury Borough) will make an important contribution to meeting housing needs up to 2031. However, further allocations are made through the GCP and it is important that the most effective use of these sites is made of these development opportunities and that residential development delivers the range of housing required to meet the city’s needs. Further information on the city’s housing requirement, delivery and site allocations made through the GCP is provided at Section 4 – Site allocations.</p>
<p>Estate regeneration</p>	<p>The City Council is in the process of preparing Supplementary Planning Documents for the areas of Matson and Podsmead. These SPDs provide</p>	<p>The City Council <u>has produced</u> is in the process of preparing Supplementary Planning Documents for the areas of Matson and Podsmead. These SPDs</p>

<p>Correct tense in supporting text.</p>	<p>additional guidance to support any future regeneration in these areas and should be considered as part of future planning applications</p>	<p>provide additional guidance to support any future regeneration in these areas and should be considered as part of future planning applications</p>
<p>Employment development, culture and tourism – Introduction. Paragraph 4.2.4</p> <p>Tidying wording – removing ‘That said...’ from the beginning of the sentence. Amend reference to Section 4 ‘Site allocations’, which is now Section 5. Other changes relate to MM14.</p>	<p>That said, the GCP plays its part in allocating sites for additional employment land, in whole or in part, at the following locations; SA07 Lynton Fields (Land East of Waterwells Business Park); SA08 King’s Quarter; SA09 Quayside House; SA17 Land South of Triangle Park; and SA21 Part of West Quay, The Docks.; and SA22 Land adjacent to Secunda Way Industrial Estate. Further information is available in Section 45 of this plan – Site allocations.</p>	<p>That said,The GCP plays its part in allocating sites for additional employment land, in whole or in part, at the following locations; SA07 Lynton Fields (Land East of Waterwells Business Park); SA08 King’s Quarter; SA09 Quayside House; SA17 Land South of Triangle Park; and SA21 Part of West Quay, The Docks.; and SA22 Land adjacent to Secunda Way Industrial Estate. Further information is available in Section 4 of this plan – Site allocations.</p>
<p>Employment development, culture and tourism – Introduction, Paragraph 4.2.5</p> <p>Grammatical error Other sentences highlighted have been copied and pasted from paragraph 3.22 of the submitted plan</p>	<p>Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p>	<p><u>It is important that the city protects existing employment land and buildings for the benefit of existing and future business, including small and medium size business (SMEs) and ‘startups’, and that opportunities are taken to support business growth and the attractiveness of employment stock.</u> Policy B2 of the GCP seeks to protect against the loss of employment land and buildings and Policy B3 supports proposed proposals to intensify existing employment land where possible and appropriate. Further information of available in the Employment Background Paper, available to download from the City Council’s website.</p>
<p>Employment development, culture and tourism –</p>	<p>At the same it is important to support the economic potential of tourism and cultural development. For this reason, the GCP supports proposals to make better use of key assets</p>	<p>At the same it is important to support the economic potential of tourism and cultural development. For this reason, the GCP supports proposals to make better use of key assets including</p>

<p>Introduction, Paragraph 4.2.6 -</p> <p>Grammatical error</p>	<p>including the Docks and Canal and develop with tourist and cultural base.</p>	<p>the Docks and Canal and develop with <u>their</u> tourist and cultural base.</p>
<p>Employment development, culture and tourism – Introduction, Paragraph 4.2.8</p> <p>Grammatical error</p>	<p>The JCS provides retail and city centre policies for the city at Policy SD2. However, this policy is subject to an immediate review. The review will cover, amongst other things, a revised assessment of retail floorspace needs and a strategy for each of the designed centres. It covers all designated ‘town centres’, i.e. the city / town centres, district centres and local centres. Further information is available on the JCS website.</p>	<p>The JCS provides retail and city centre policies for the city at Policy SD2. However, this policy is subject to an immediate review. The review will cover, amongst other things, a revised assessment of retail floorspace needs and a strategy for each of the designed <u>designated</u> centres. It covers all designated ‘town centres’, i.e. the city / town centres, district centres and local centres. Further information is available on the JCS website.</p>
<p>B2 Safeguarding employment sites and buildings – Supporting text, Paragraph 4.2.18</p> <p>Spelling error</p>	<p>Gloucester is a primary focus for economic activity in the county and it is important this is maintained. In order to achieve this, existing sites and premises are protected from redevelopment to alternative uses, unless the proposal can meet the criteria outlined in the above policy. Where opportunities exist, the City Council will support proposals to intensify and improve the quality and offer of existing employment sites – see Policy B3 below.</p>	<p>Gloucester is a primary focus for economic activity in the county and it is important this is <u>is</u> maintained. In order to achieve this, existing sites and premises are protected from redevelopment to alternative uses, unless the proposal can meet the criteria outlined in the above policy. Where opportunities exist, the City Council will support proposals to intensify and improve the quality and offer of existing employment sites – see Policy B3 below.</p>
<p>B3 New employment development and intensification and improvements to existing employment land – Supporting text, Paragraph 4.2.24</p> <p>Grammatical error</p>	<p>The City Council’s Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment land within the city, which overall meets of and is attractive to the business community. However, it also identifies that there are opportunities for environmental improvements and/or intensification that could support increased productivity/economic growth and the needs of growing businesses. This is particularly true within the city centre where concerns around the quality of the environment has been identified as an issue in attracting businesses to the area.</p>	<p>The City Council’s Employment Land Review (2019), Economic Growth Strategy (2019) and Strategy Options for the City of Gloucester (2017) point to an excellent supply of existing employment land within the city, which overall meets <u>the needs</u> of and is attractive to the business community. However, it also identifies that there are opportunities for environmental improvements and/or intensification that could support increased productivity/economic growth and the needs of growing businesses. This is particularly true within the city centre where concerns around the quality of the environment has been identified as an issue in attracting businesses to the area.</p>

B6 Protection of public houses – Supporting text, Paragraph 4.2.36 Grammatical error	Local pubs can be an important focal point within the local community. The City Council therefore seeks to protect pubs from unnecessary loss and will seek evidence to from an applicant to demonstrate that all reasonable efforts have been made to retain the pub in viable use.	Local pubs can be an important focal point within the local community. The City Council therefore seeks to protect pubs from unnecessary loss and will seek evidence to from an applicant to demonstrate that all reasonable efforts have been made to retain the pub in viable use.
Healthy communities – Introduction and context, Paragraph 4.3.1 Amend Key Principle number	Across the city there are significant health inequalities which result in people living a poorer quality of life and having reduced life expectancy. In 2016 life expectancy was 13.9 years lower for men and 12.5 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. Key Principle 14 of this plan seeks to improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities	Across the city there are significant health inequalities which result in people living a poorer quality of life and having reduced life expectancy. In 2016 life expectancy was 13.9 years lower for men and 12.5 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. Key Principle 14 <u>12</u> of this plan seeks to improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities
Healthy communities – Introduction and context Explains how wider policies support healthy communities	The following policies have been included to ensure new development does not harm human health and takes all available opportunities to provide our residents with healthy active choices.	The following policies have been included to ensure new development does not harm human health and takes all available opportunities to provide our residents with healthy active choices. <u>More widely, the GCP supports the creation of healthier communities. This is reflected in many other policies, for example those relating to heritage, good design and creating a sense of place in new development, the delivery of new homes that meet the needs of communities and sustainable transport.</u>
C1 Active design and accessibility – Supporting text, Paragraph 4.3.9 Replace ‘or’ with ‘and’	Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing. All of which will be accessible by walking or cycling.	Active design promotes healthy lifestyles that are made easy through: the pattern of development, providing access to local services and facilities, good levels of connectivity, green spaces and green routes, safe places for active play, and spaces for food growing. All of which will be accessible by walking or <u>and</u> cycling.
C3 Public open space, playing fields and	The location and extent of open spaces and playing fields is identified on the policies map. Where new development	The location and extent of open spaces and playing fields is identified on the policies map. Where new development

<p>sports facilities, Paragraph 4.3.21</p> <p>Grammatical error</p>	<p>delivers additional open spaces and playing fields that aren't shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these include sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.</p>	<p>delivers additional open spaces and playing fields that aren't <u>are not</u> shown on the policies map, these will be afforded the same level of protection. In terms of protecting against the loss of built sports facilities, for the avoidance of doubt, these include sports halls, swimming pools, squash courts, the athletics track, indoor bowls and indoor tennis. It also includes village, community and parish halls, albeit they have a wider function within the community.</p>
<p>Hot food takeaways</p> <p>Additional supporting text regarding waste management</p>	<p>New paragraph in supporting text.</p>	<p><u>Hot food takeaways can often generate significant levels of local litter and waste. The Council will expect efficient and effective commercial waste collection services that support the implementation of the waste hierarchy and encourage resource efficiency and waste reduction.</u></p>
<p>Hot food takeaways</p> <p>Update to obesity figures in supporting text</p>	<p>Gloucester has several health issues connected with obesity that need to be addressed. Public Health England (PHE) reports that in 2017/18 66.3% of adults and 36.8% of children in Year 6 were overweight. Reducing obesity, particularly among children, is one of the priorities of (PHE and the government's 'Childhood Obesity Plan'). Being overweight increases a person's risk of developing cancer, heart disease and type 2 diabetes.</p>	<p>Gloucester has several health issues connected with obesity that need to be addressed. Public Health England (PHE) reports that in 2017/18 66.3% of adults and 36.8% of children in Year 6 were overweight. <u>2018/19 25.9% of 4-5 year olds and 36.9% of 10-11 year olds in Gloucester City are an excess weight (overweight or obese).</u> These figures are significantly higher than national and county averages. Furthermore, 5.4% of 10-11 year olds are affected by severe obesity and this level is one of the highest in the South West region. Reducing obesity, particularly among children, is one of the priorities of (PHE and the government's 'Childhood Obesity Plan'). Being overweight increases a person's risk of developing cancer, heart disease and type 2 diabetes.</p>
<p>Heritage introduction</p> <p>Reflect NPPF Terminology, Heritage Strategy and Highstreet Heritage</p>	<p>The City Council has recently adopted a new Heritage Strategy (HS) for the city. It sets out that Gloucester's historic environment, is a powerful resource for economic development, regeneration, supporting business and enterprise, competitiveness, tourism, and attracting people to live, work, visit and invest. It also provides volunteer opportunities and helps foster local identify and pride.</p>	<p><u>Gloucester Heritage Strategy</u></p> <p>The City Council has recently adopted a new Heritage Strategy (HS) for the city. It sets out that Gloucester's historic environment, is a powerful resource for economic development, regeneration, supporting business and enterprise, competitiveness, tourism, and attracting people to</p>

<p>Action Zone (Cathedral Quarter)</p>	<p>The overall aim of the HS is ‘To achieve effective and sustainable conservation, regeneration and management of Gloucester’s heritage, so as to fully realise its economic, community and cultural potential.’ It sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.</p> <p>The JCS and GCP have a strong role in delivering the aims and objectives of the HS. The policies that follow in this section quite obviously have a direct link in that they seek to conserve and enhance the historic environment. However, the HS is a golden thread that has informed and will be delivered by different policies, including for example Policy A1, which supports the reuse of vacant floors above commercial units to support the reuse of historic buildings and repopulation of the city centre. There are also important implications for some of the site allocations, particularly SA08 King’s Quarter, SA10 Former Fleece Hotel & Longsmith Street Car Park and SA21 Park of West Quay, The Docks.</p>	<p>live, work, visit and invest. It also provides volunteer opportunities and helps foster local identify and pride.</p> <p>The overall aim of the HS is ‘To achieve effective and sustainable conservation, regeneration and management of Gloucester’s heritage, so as to fully realise its economic, community and cultural potential.’ It sets out projects and opportunities to deliver, enable, engage and support conservation and recreation of heritage.</p> <p><u>The HS was delivered through the Great Place scheme, funded by the Heritage Fund and Arts Council England. The Great Place scheme places a strategic focus on enhancing Gloucester’s heritage for all and embeds a culture of developing an holistic approach to the regeneration of the city centre through the development of a heritage strategy which will in turn aid proactive working with developers, members, stakeholders and partners, whether professional or residents of the City over the next ten years and beyond.</u></p> <p><u>Heritage is a key component in the effective delivery of sustainable growth. It contributes to the creation of a competitive City Centre, support for the diverse needs of local communities, and the creation and maintenance of a high quality and sustainable environment. The historic environment is an integral part of the wider regeneration, economic development, tourism and cultural aspirations of the City of Gloucester.</u></p> <p><u>A background document has been created which informs the Gloucester Heritage Strategy 2019-29 titled "Gloucester Heritage Strategy Background Document - Evidence, Analysis, Engagement". It comprises an evidence base and summary of</u></p>
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		<p><u>stakeholder engagement and provides the foundation on which the strategy has been formulated. In addition to being the evidence base for the heritage strategy, it provides evidence for the Gloucester City Local Plan and includes evidence and analysis of Gloucester’s heritage resources, including the nature of the resource, economic value and key issues. Analysis of key projects and development involving or affecting Gloucester’s heritage, with a particular focus on design quality and economic impact. An overview of other local plans and strategies relevant to heritage. A summary of the outcomes of stakeholder and community engagement. Details of local stakeholders from across the sectors and a section on possible funding sources.</u></p> <p><u>The Heritage Strategy has been written as a collaboration between local and national heritage organisations, including the City Council, Gloucester Civic Trust, Gloucester Historic Buildings Trust, Gloucester Heritage Forum and Historic England. The delivery of the key actions will require collaboration and close working between those partners to draw upon each other’s strengths and to attract the necessary resources to maximise the 10-year vision the strategy puts forward.</u></p> <p><u>High Street Heritage Action Zone – Cathedral Quarter</u></p> <p><u>The City Council has also been successful in achieving High Street Heritage Action Zone (HSHAZ) status for the Cathedral Quarter, located around Westgate Street. Westgate is one of the oldest and best-preserved areas of Gloucester and the main commercial route linking the cathedral to the rest of the city. One of four original Roman routes, Westgate links the spectacular medieval cathedral to the rest of the city. Its array</u></p>
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		<p><u>of stunning historic buildings includes the 15th century timber-framed Fleece Inn and Antiques centre, both of which are on Historic England’s Heritage at Risk register. Despite its strong historic character, proximity to the cathedral and good location, Westgate Street is underperforming. Westgate’s retail environment has changed dramatically in recent years. It once had a strong mix of independent businesses whose owners embraced the street’s historic buildings, but many have moved on and prospective new owners feel the properties are expensive to run and difficult to convert. The street scene is tired, with poor paving, inconsistent signage, and general clutter. Many retail units stand vacant. Locals perceive the area in a negative light and of the thousands of visitors to the cathedral, few are attracted into Westgate Street.</u></p> <p><u>The Heritage Action Zone will capitalise on Westgate’s untapped potential and boost the number of people living, working and taking pride in the area. The award of up to £1.9m to Gloucester City Council will invest in Westgate Street’s beautiful historic buildings, repairing buildings and historic shopfronts and converting vacant upper floors for new uses. There will be advice and support for businesses in historic properties, and the streetscape will be improved with new signage and branding. The area will be vibrant with cultural activities, from community archaeology to performing arts, and will become known for its attractive evening and night-time offer. The Heritage Action Zone will help Westgate thrive again by bringing a modern business approach to an outstanding historic environment.</u></p> <p>The JCS and GCP have a strong role in delivering the aims and objectives of the <u>HS and Cathedral Quarter HZAZ</u>. The policies that follow in this section quite obviously have a direct link in</p>
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		that they seek to conserve and enhance the historic environment. However, the HS is a golden thread that has informed and will be delivered by different policies, including for example Policy A1, which supports the reuse of vacant floors above commercial units to support the reuse of historic buildings and repopulation of the city centre. There are also important implications for some of the site allocations, particularly SA08 King’s Quarter, SA10 Former Fleece Hotel & Longsmith Street Car Park and SA21 Park of West Quay, The Docks.
Heritage introduction Reference the Townscape Character Study and Public Realm Strategy	New paragraphs	<u>A Townscape Character Assessment (TCA) has been undertaken for every part of the City. The TCA identifies the morphology of Gloucester identifying form and origins, building types, past and present uses, trees and greenspaces, grain, density and plot coverage, and architectural qualities including periods, detailing and materials and colour palettes for each character area. The TCA can be used to inform an understanding of character and local distinctiveness.</u> <u>The Public Realm Strategy SPD provides further guidance relating to the high-quality design of streets, squares, parks, green spaces and other outdoor spaces required in the historic core of the City.</u>
Non-designated heritage assets Rationalise text and reference commitment to preparing a Local List in supporting text	Gloucester City Council does not have a formal Local List of non-designated heritage assets, but the Council have developed criteria for the identification of undesigned heritage assets which may be suitable for inclusion on a future local list and this is available from the City Council website. These criteria have been developed following Historic England Guidance ‘Local Heritage Listing: Historic England Advice Note 7’, which is available to download from the Historic England website.	Gloucester City Council does not have a formal <u>is in the process of creating a Local List of non-designated heritage assets, using a criteria for the</u> but the Council have developed criteria for the identification of undesigned heritage assets, which may be suitable for inclusion on a future local list and this is available from the City Council website. These criteria have been developed following Historic England Guidance ‘Local Heritage Listing: Historic England Advice Note 7’, which is available to download from the Historic England website.

	Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future Local List.	Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future <u>the</u> Local List.
D2 Non-designated Heritage Assets, Paragraph 4.4.24 Deleted 'any future' as the City Council is now preparing a local list.	4.4.24 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future Local List.	4.4.24 Non-designated heritage assets will continue to be identified as part of the planning application process, Gloucestershire Historic Environment Record and the Gloucester Townscape Character Appraisal (2019), will be given appropriate consideration and may be added to any future <u>the</u> Local List.
D4 Shopfronts, shutters and signs (now D7). Typo – delete an additional 'a'.	2. Proposals for new shopfronts <u>New shopfronts</u> which are of a high quality	2. Proposals for new shopfronts <u>New shopfronts</u> which are of a high quality
Natural environment introduction Reference climate and ecological emergencies declared by the Government and City Council	The protection of the natural environment and the fight against climate change has never been higher up the political agenda. In January 2018 the Government published an ambitious '25- year plan to improve the environment' which set several challenging targets. In June 2019 the Government announced that it was committing the UK to net zero greenhouse gas emissions by 2050, the first country in the world to do this. At the local level the Gloucester City Plan (GCP) seeks to make a difference. The policies in this chapter specifically reflect Key Principles 1, 9 and 11. All the policies aim, directly or indirectly to address climate change.	The protection of the natural environment and the fight against climate change has never been higher up the political agenda. In January 2018 the Government published an ambitious '25- year plan to improve the environment' which set several challenging targets. <u>In May 2019 the UK parliament declared a climate and ecological emergency.</u> In June 2019 the Government announced that it was committing the UK to net zero greenhouse gas emissions by 2050, the first country in the world to do this. At the local level the Gloucester City Plan (GCP) seeks to make a difference. The policies in this chapter specifically reflect Key Principles 1, 9 and 11. <u>In July 2019 the City Council declared a climate emergency committing to make the city carbon neutral</u>

		by 2050 and the Council's activities by 2030. All the policies aim, directly or indirectly to address climate change.
Biodiversity and geodiversity Add text to asterix in supporting text (was missing)	Where an adverse effect (or effects) on integrity cannot be mitigated, further tests will apply in order to decide whether permission can be granted*.	Where an adverse effect (or effects) on integrity cannot be mitigated, further tests will apply in order to decide whether permission can be granted*. <u>*Habitats Regulations Assessment. Conservation of Habitats & Species Regulations 2017 (As amended) – Paragraph 63 & 64. See also adopted JCS Policy SD9 and Policy E7 of this Plan.</u>
E1 Biodiversity and geodiversity Remove additional bracket	Development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire Local Wildlife Sites (LWS) and Regionally Important Geological Sites (RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated that:	Development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire Local Wildlife Sites (LWS) and Regionally Important Geological Sites (RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated that:
E1 Biodiversity and geodiversity, Paragraph 4.5.9 Amend policy reference	If the City Council considers that no on site mitigation is practical or possible, measures should be implemented as 'biodiversity offsetting' in the nearest Green Infrastructure (GI) project as set out in the JCS Green Infrastructure Strategy, or if this isn't possible, in Gloucester's designated Nature Recovery Area (NRA) as detailed at Policy E3 of the GCP.	If the City Council considers that no on site mitigation is practical or possible, measures should be implemented as 'biodiversity offsetting' in the nearest Green Infrastructure (GI) project as set out in the JCS Green Infrastructure Strategy, or if this isn't possible, in Gloucester's designated Nature Recovery Area (NRA) as detailed at Policy E3 2 of the GCP.
Green / Blue Infrastructure Correct name of JCS Green Infrastructure Strategy in supporting text	JCS Policy INF3 and the associated JCS Green Infrastructure Plan (GIP) seek to connect the urban areas of Gloucester with the high-quality Green Infrastructure (GI) assets of the Cotswold's AONB and the Severn Vale.	JCS Policy INF3 and the associated JCS Green Infrastructure Plan (GIP) Strategy seek to connect the urban areas of Gloucester with the high-quality Green Infrastructure (GI) assets of the Cotswold's AONB and the Severn Vale.
Flooding, sustainable drainage and wastewater	Applicants should contact the Environment Agency at the earliest opportunity to understand the constraints and opportunities of culverted watercourses for their proposals	Applicants should contact the Environment Agency and the Lead Local Flood Authority at the earliest opportunity to understand the constraints and opportunities of culverted

Reference that 'Land Drainage Consent' may be required, in supporting text.		watercourses for their proposals <u>and because Land Drainage Consent may be required.</u>
E4 Flooding, sustainable drainage, and wastewater, Paragraph 4.5.38 Grammatical and spelling error	Development proposals shall not remove or interrupt the continuity of existing natural or manmade drainage features, unless agreed with the city Council. Where watercourses or dry ditches are present within a development site, these should be retained and, where 76 possible, enhanced. Enhancement measures could include removing redundant structures, improving fish passage and restoring watercourses to more natural alignments by improvingly hydromorphology. All measures can contribute to achieving 'good' status as required under the Water Framework Directive. Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the site maintenance plan. The removal of natural drainage features may result in an increased need to connect to the public sewerage network, and therefore be contrary to the SuDS / drainage hierarchy.	Development proposals shall not remove or interrupt the continuity of existing natural or manmade drainage features, unless agreed with the eCity Council. Where watercourses or dry ditches are present within a development site, these should be retained and, where 76 possible, enhanced. Enhancement measures could include removing redundant structures, improving fish passage and restoring watercourses to more natural alignments by improvingly hydromorphology. All measures can contribute to achieving 'good' status as required under the Water Framework Directive. Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the site maintenance plan. The removal of natural drainage features may result in an increased need to connect to the public sewerage network, and therefore be contrary to the SuDS / drainage hierarchy.
Renewable energy potential of the River Severn and Canal Correct Canal and River Trust name in supporting text	According to the Canal and River Trust...	According to the Canal and & River Trust...
E5 Renewable energy potential of the River Severn and the Canal, Paragraph 4.5.46 Grammatical error	Development that may have direct and indirect impacts on watercourses used by the Special Areas of Conservation (SAC) and Ramsar species, which will be subject to a Habitats Regulations Assessment (HRA).	Development that may have direct and indirect impacts on watercourses used by the Special Areas of Conservation (SAC) and Ramsar species, which will be subject to a Habitats Regulations Assessment (HRA).

<p>E6 Development affecting Cotswold Beechwoods Special Area of Conservation, Paragraph 4.5.47</p> <p>Spelling error</p>	<p>There is planned growth in housing development in districts surrounding the Cotswold Beechwoods Special Area of Conservation (SAC), which could lead to an increased level of recreational pressure resulting from people visiting the site. Due to the extent of the Beechwoods and the fact that visitors travel a significant distance to visit the site, a Gloucestershire wide approach is required in order to successfully mitigate and likely adverse impacts.</p>	<p>There is planned growth in housing development in districts surrounding the Cotswold Beechwoods Special Area of Conservation (SAC), which could lead to an increased level of recreational pressure resulting from people visiting the site. Due to the extent of the Beechwoods and the fact that visitors travel a significant distance to visit the site, a Gloucestershire wide approach is required in order to successfully mitigate and likely adverse impacts.</p>
<p>Development affecting Cotswold Beechwoods Special Area of Conservation, Paragraph 4.5.48</p> <p>Delete likely timing of Mitigation Strategy</p>	<p>The Gloucestershire planning authorities commissioned a visitor survey, carried out over the summer of 2019, in order to better understand the recreational pressures on the SAC. The survey results will form part of the evidence base leading to the production of a mitigation strategy. This will identify what measures need to be put in place to mitigate the impact of new development and ensure the protection of the site. The evidence may also assist in determining when a development may be likely to have an adverse impact depending on factors such as distance from the SAC. The mitigation strategy is expected to be available in early 2020.</p>	<p>The Gloucestershire planning authorities commissioned a visitor survey, carried out over the summer of 2019, in order to better understand the recreational pressures on the SAC. The survey results will form part of the evidence base leading to the production of a mitigation strategy. This will identify what measures need to be put in place to mitigate the impact of new development and ensure the protection of the site. The evidence may also assist in determining when a development may be likely to have an adverse impact depending on factors such as distance from the SAC. The mitigation strategy is expected to be available in early 2020.</p>
<p>F5 Open plan estates, Paragraph 4.6.25</p> <p>Missing full stop</p>	<p>Extending the boundary treatment of gardens to incorporate amenity land can reduce the feeling of openness. When the boundary is adjacent to a footpath enclosing the surrounding amenity space can have a negative impact on visual amenity and community safety by narrowing the overall width of the footway and its landscaping. This can reduce views along the footpath and make the footpath feel more enclosed and less safe to use.</p>	<p>Extending the boundary treatment of gardens to incorporate amenity land can reduce the feeling of openness. When the boundary is adjacent to a footpath enclosing the surrounding amenity space can have a negative impact on visual amenity and community safety by narrowing the overall width of the footway and its landscaping. This can reduce views along the footpath and make the footpath feel more enclosed and less safe to use.</p>
<p>F6 Nationally Described Space Standards, Paragraph 4.6.24</p>	<p>The NPPF states makes clear that it is important to plan for the achievement of high quality and inclusive design for all development, including individual buildings. Housing developments should be of the highest possible quality internally, externally and in relation to their local context. All new housing should have sufficient internal space to cater for</p>	<p>The NPPF states makes clear that it is important to plan for the achievement of high quality and inclusive design for all development, including individual buildings. Housing developments should be of the highest possible quality internally, externally and in relation to their local context. All new housing should have sufficient internal space to cater for a</p>

Remove additional word – ‘states’	a variety of different household needs, with the aim of promoting high standards of liveability, accessibility and comfort.	variety of different household needs, with the aim of promoting high standards of liveability, accessibility and comfort.
Climate change summary, Paragraph 4.7.5 Spelling error	Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in officers and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.	Climate change today is already resulting in a shift in our seasons; hotter drier summers, warmer wetter winters, more frequent droughts, more storms and gales resulting in damage to property. This is creating loss in wildlife habitats and species, social unrest through increased migration, greater demand for cooling in officers <u>offices</u> and homes, greater strain on water resources and wildlife, worsening summer air pollution, greater risk of flooding, increased heat stress to the elderly and infirm. These effects are happening globally and here in Gloucester. The risk of flooding in Gloucester and neighbouring areas is already high and these risks are increasing steadily.
Climate change summary, Paragraph 4.7.12 Delete ‘recently published’	This policy also links to the recently published the Gloucestershire Energy Strategy 2019	This policy also links to the recently published the Gloucestershire Energy Strategy 2019
G1 Sustainable transport and parking, Paragraph 4.7.15 Grammatical error	At present, buses and taxis operating within the city are fuelled by petrol/diesel. The City Council supports a move away from vehicles that use fossil fuels to the use renewable sources. Applications for infrastructure to support this, such as electric charging points, will be supported where they comply with other policies with the JCS and GCP.	At present, buses and taxis operating within the city are fuelled by petrol/diesel. The City Council supports a move away from vehicles that use fossil fuels to the use renewable sources. Applications for infrastructure to support this, such as electric charging points, will be supported where they comply with other policies <u>with</u> in the JCS and GCP.
G2 Cycling Add supporting text regarding the benefits of green cycling routes	Gloucester is relatively flat and is a good place to cycle. Cycling is increasingly popular and arguably if routes and facilities were better and safer, the take-up would be even greater. Cycling as an activity and a mode of transport has very few downsides. It is an effective means of transport that can significantly reduce car trips. Cycling contributes towards	Gloucester is relatively flat and is a good place to cycle. Cycling is increasingly popular and arguably if routes and facilities were better and safer, the take-up would be even greater. Cycling as an activity and a mode of transport has very few downsides. It is an effective means of transport that can significantly reduce car trips. Cycling contributes towards reducing carbon

	reducing carbon emissions and improving air quality. It assists with the adoption of healthier lifestyles and can help existing transport networks in towns and cities to run more efficiently	emissions and improving air quality. It assists with the adoption of healthier lifestyles and can help existing transport networks in towns and cities to run more efficiently. <u>There is evidence that 'green' cycling routes are more likely to be used and that they contribute to the enhancement of ecological networks.</u> These factors should be considered when improvements are made.
G2 Cycling Add supporting text clarifying that the canal towpath isn't a dedicated cycle path.	New paragraph	<u>With regard to the Canal towpath, this is not a dedicated cycle path and current and future use must reflect the needs of other users.</u>
G3 Walking Add supporting text regarding the benefits of green walking routes	Regularly walking in a safe and pleasant environment can have major benefits for health and wellbeing and where there is an opportunity for walking there is generally also the opportunity for jogging / running. Good quality, connected and accessible footpaths can encourage people to walk to access local shops, services or sustainable transport connections, supporting more active lifestyles and reducing the use of the private car.	Regularly walking in a safe and pleasant environment can have major benefits for health and wellbeing and where there is an opportunity for walking there is generally also the opportunity for jogging / running. Good quality, connected and accessible footpaths can encourage people to walk to access local shops, services or sustainable transport connections, supporting more active lifestyles and reducing the use of the private car. <u>There is evidence that 'green' walking routes (e.g. pavements with trees) are more likely to be used and that they contribute to the enhancement of ecological networks.</u> These factors should be considered when improvements are made.
G3 Walking Grammatical error	The City Council will support development proposals that protect and enhances convenient, safe and pleasant walking environments within the city and, where appropriate, to areas outside of the City Council's administrative boundary.	The City Council will support development proposals that protect and enhances convenient, safe and pleasant walking environments within the city and, where appropriate, to areas outside of the City Council's administrative boundary.
G5 Broadband connectivity, Paragraph 4.7.31	The NPPF requires planning policies to support the expansion of full-fibre broadband connections, prioritising connections to existing and new developments. Likewise, it is Government policy for all properties to have access to full-	The NPPF requires planning policies to support the expansion of full-fibre broadband connections, prioritising connections to existing and new developments. Likewise, it is Government policy for all properties to have access to full-fibre broadband

Delete extra 'high speed' and correct spelling error	<p>fibre broadband by 2025. This policy requires all new residential and commercial development to be serviced by a high speed, reliable and high-speed broadband connection. At present, the main target standard is for full-fibre connectivity. This may well change in the future; if this is the case, it is expected that properties should be meet the best possible standard.</p>	<p>by 2025. This policy requires all new residential and commercial development to be serviced by a high speed, reliable and high-speed broadband connection. At present, the main target standard is for full-fibre connectivity. This may well change in the future; if this is the case, it is expected that properties should be meet the best possible standard.</p>
<p>Site allocations introduction</p> <p>Correct name of Transport Assessment</p>	<p>The site allocation is underpinned by a comprehensive evidence base including a Flood Risk Assessment (Level 2), Highways Assessment and Infrastructure Delivery Plan to understand the likely infrastructure requirement required to support delivery.</p>	<p>The site allocations is <u>are</u> underpinned by a comprehensive evidence base including a Flood Risk Assessment (Level 2), Highways <u>Transport</u> Assessment and Infrastructure Delivery Plan to understand the likely infrastructure requirement required to support delivery.</p>
<p>Jordan's Brook House site allocation statement</p> <p>Remove reference to retention of naturalised watercourse</p>	<p>Biodiversity</p> <ul style="list-style-type: none"> • Improve Green Infrastructure links via a corridor to Land at Barnwood Manor (Site Allocation SA02) and Barnwood Arboretum / Park and Local Wildlife Site. • Retention of naturalised watercourse. 	<p>Biodiversity</p> <ul style="list-style-type: none"> • Improve Green Infrastructure links via a corridor to Land at Barnwood Manor (Site Allocation SA02) and Barnwood Arboretum / Park and Local Wildlife Site. • Retention of naturalised watercourse.
<p>Land south of Triangle Park site allocation statement</p> <p>Amend 'description and overview' to match Main Modification required to reflect new Use Classes Order (MM59 and MM88).</p>	<p>The site provides an opportunity for an extension to the successful 'Triangle Park' to the north and is therefore allocated for B use employment.</p>	<p>The site provides an opportunity for an extension to the successful 'Triangle Park' to the north and is therefore allocated <u>as above</u> for B use employment.</p>
Monitoring Framework	<p>The following provides the monitoring framework to review the effectiveness of policies. The JCS already includes a</p>	<p>The following provides the monitoring framework to review the effectiveness of policies. The JCS already includes a monitoring</p>

Grammatical error	monitoring framework, which are directly relevant to GCP policies. Additional indicators have been identified where there is a gap and the information required in easily available and reliable.	framework, which are <u>is</u> directly relevant to GCP policies. Additional indicators have been identified where there is a gap and the information required in <u>is</u> easily available and reliable.									
Monitoring framework Add health indicators.	New indicators	<table border="1"> <tr> <td><u>Gap in child expectancy</u></td> <td><u>Gloucestershire County Council – Public Health</u></td> <td><u>Annual</u></td> </tr> <tr> <td><u>Adults in physical activity</u></td> <td><u>Gloucestershire County Council – Public Health</u></td> <td><u>Annual</u></td> </tr> <tr> <td><u>National Child Measurement data</u></td> <td><u>Gloucestershire County Council – Public Health</u></td> <td><u>Annual</u></td> </tr> </table>	<u>Gap in child expectancy</u>	<u>Gloucestershire County Council – Public Health</u>	<u>Annual</u>	<u>Adults in physical activity</u>	<u>Gloucestershire County Council – Public Health</u>	<u>Annual</u>	<u>National Child Measurement data</u>	<u>Gloucestershire County Council – Public Health</u>	<u>Annual</u>
<u>Gap in child expectancy</u>	<u>Gloucestershire County Council – Public Health</u>	<u>Annual</u>									
<u>Adults in physical activity</u>	<u>Gloucestershire County Council – Public Health</u>	<u>Annual</u>									
<u>National Child Measurement data</u>	<u>Gloucestershire County Council – Public Health</u>	<u>Annual</u>									
Appendix 2 – Relationship with the Adopted Development Plan. Corrected first row of table to state ‘Development Plan’ rather than ‘Joint Core Strategy.’	<u>The following table sets out how each of the policies in the Gloucester City Plan relate to policies in the adopted Joint Core Strategy.</u>	<u>The following table sets out how each of the policies in the Gloucester City Plan relate to policies in the adopted Development Plan Joint Core Strategy.</u>									
Glossary Amend name of Highways England	Highways Agency - An executive agency of the Department for Transport. The Highways Agency is responsible for operating, maintaining and improving the strategic road network of England.	Highways Agency <u>England</u> - An executive agency of the Department for Transport. The Highways Agency <u>England</u> is responsible for operating, maintaining and improving the strategic road network of England.									
Glossary Delete reference to transport assessment	Transport Assessment – A comprehensive review of all the potential transport impacts of a proposed development or redevelopment, with an agreed plan to mitigate any adverse consequences.	Transport Assessment – A comprehensive review of all the potential transport impacts of a proposed development or redevelopment, with an agreed plan to mitigate any adverse consequences.									
Glossary	Community Infrastructure Levy - A levy allowing local authorities to raise funds from owners or developers of land	Community Infrastructure Levy – A levy allowing local authorities to raise funds from owners or developers of land									

Delete reference to 'Community Infrastructure Levy' – Not reference in Gloucester City Plan	undertaking new building projects in their area. Learn more about the Community Infrastructure Levy.	undertaking new building projects in their area. Learn more about the Community Infrastructure Levy.
Glossary Delete reference to 'Decentralised Energy' – Not reference in Gloucester City Plan	Decentralised Energy - Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.	Decentralised Energy – Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.
Glossary Add 'Gloucester' City Plan and move to alphabetical location in glossary	City Plan – Part of the Development Plan for the City of Gloucester	<u>Gloucester City Plan</u> – Part of the Development Plan for the City of Gloucester.