

**Revised Draft Greater Blackfriars
Planning Brief**

Supplementary Planning Document

Consultation October – November 2007

***Schedule of Comments with Officer
Responses***

(Published August 2009)



Explanatory Note

The following table summarises the comments that were received to the revised draft Greater Blackfriars Planning Brief (held under Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations 2004), and the reasons why the comments were, or were not, taken into account as part of the revised document. The consultation was held between 1st October and 12th November 2007.

If you have any questions please email spatialplanning@gloucester.gov.uk or telephone 01452 396836.

| Name/ Reference Number | Support/ Object/ Comment | Policy/ Section | Comment/ Representation | Response |
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| 0337 Gloucestershire Constabulary County Police HQ | SUPPORT | The Brief and location of police station | Gloucestershire Constabulary fully supports the initiative to regenerate the Greater Blackfriars area, including the provision of a replacement police station for Gloucester City. | Comment of support noted |
| 0337 Gloucestershire Constabulary County Police HQ | SUPPORT | The Brief and location of police station | The City Council should note that due to the Constabulary's requirement to be in a prominent and accessible position, the preferred location for the replacement police station may be separate from the proposed civic quarter which is expected to accommodate the future county and city council offices. | <p>Comment of support noted</p> <p>It is acknowledged that the replacement police station may not be in the proposed Civic Centre, but this issue will be resolved at the detailed design stage.</p> <p>No Change proposed</p> |
| 1146 Highways Agency | COMMENT | The Brief | <p>The Agency is aware the site is located within Gloucester City Centre and therefore unlikely to have a direct impact on the strategic road network. The Agency would however recommend that the redevelopment should comprise of mixed-use development, including residential, employment and a range of services and facilities in order to create a self-contained community. The Agency supports the inclusion of sustainable transport modes and improved pedestrian and cycle links.</p> <p>The Agency needs to be satisfied that any</p> | <p>Comment of support noted.</p> <p>The proposals seek to promote mixed-use development in as sustainable a way as possible. It is not clear what is meant by a self-contained community, since as the retail and commercial hub of the City the area will rely upon trade and will seek to meet the retail service and employment needs of a much larger community.</p> <p>The Brief and subsequent development is and will be based upon sound sustainable transport packages, in consultation with the County Council as Highway</p> |

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| | | | <p>proposed development in the City takes account of the impact of development on the strategic road network and wishes to promote wherever possible sustainable modes of transport. The Agency is fully committed to the promotion of a sustainable transport system and would expect any future proposals to be supported by a comprehensive package of public transport and demand management measures.</p> | <p>Authority.</p> <p>No Change proposed.</p> |
| 1444 Gloucestershire County Council | COMMENT | Cycle Parking Standards | <p>Paragraph 4.17. Traffic and Transport. Cycle parking standards should be expressed as a 'minimum' not a 'maximum'.</p> | <p>Cycle parking standards are now dealt with at para 4.30 and relate to the standards set out in the Second Gloucestershire Local Transport Plan rather than maxima or minima.</p> <p>No change proposed.</p> |
| 0091 Mr J Rhodes | COMMENT | Paragraph 4.12 | <p>Paragraph 4.12. Please strengthen this paragraph to require the developer to improve the flood barrier at The Quay. This barrier was highlighted as the most critical point in the city during the summer 2007 floods, and is of utmost importance in terms of protecting large areas of Blackfriars and Westgate.</p> <p>The barrier should be at 11.78 AOD, which is the EA's recommended minimum level for new build. This level is 1.4 metres above the road and presents a greater challenge to design than is allowed for in paragraph 4.37.</p> | <p>Need to ensure the flood barrier at the Quay is in line with EA recommendations. Agree. The proposals for the Quay wall will be promoted in conjunction with EA and this is stated clearly within the para in question.</p> <p>No Change proposed</p> |
| 0231 The Gloucester | SUPPORT | The Brief | <p>Support approach taken in document. It is consistent with the emerging Core Strategy DPD as well as pertinent national planning guidance.</p> | <p>Comments of support noted.</p> |

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| Quays Partnership | | | | |
| 01828 English Heritage | COMMENT | Contextual Analysis | Existing contextual analysis will enable an appreciation of value to ensure that the SPD doesn't compromise the unique historic assets that their full value is exploited, a positive impact is maximised, and potential is fully realised. | Comments of support noted. |
| 01828 English Heritage | COMMENT | Contextual Analysis | Suggest partnership working with GHURC to realise potential. | GHURC is referred to at paragraphs 3.24 – 3.26, including partnership working. No change proposed. |
| 0181 South West Regional Assembly | COMMENT | Conformity with RPG10 and Draft RSS | <p>Confirm is in general conformity with RPG10 and the draft RSS.</p> <p>However we draw your attention to the following policies contained within the draft RSS.</p> <p>Housing</p> <p>RPG10 Policy HO.6 states that housing densities should be sought in the range of 30 - 50 dwellings per hectare across the region, with significantly higher densities on urban sites, especially those close to town centres and transport nodes. Draft RSS Policy H.2 and supporting text state that major development and redevelopment within the urban areas of the SSCT should achieve 50 dwellings per hectare or more. Whilst we believe that the proposals in the SPD's generally meet these density requirements, we suggest that higher densities</p> | Confirmation noted |

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| | | | <p>should be sought where possible.</p> <p>Transport</p> <p>In the light of draft RSS policy TR.1 it should be ensured that the proposed transport measures in the SPD's sufficiently comply with more sustainable transport modes and a step change in public transport provision. This should also be seen with regard to guidance published by the Department for Transport (Circular 02/2007) relating to Planning and the Strategic Road Network and also 'Guidance for Transport Assessment (DfT, DCLG 2007). Furthermore, the proposed measures should align with the integrated transport package for Gloucester as proposed in the draft RSS.</p> <p>Sustainable Construction</p> <p>Support 10% renewable energy provision requirement as detailed in SPD's. However, Development Policy G - Sustainable Construction and Policy RE.5 - Renewable Energy and New Development were amended due to the findings of additional technical studies commissioned by SWRA and aim to achieve zero carbon for major residential and non-residential developments. See policies for further information.</p> | |
| 01771 Mr Nigel Spry | COMMENT | Paragraph 2.34 | Paragraph 2.34. It might be worth pointing out that the lines of Roman Colonia defences, and before that the fortress defences, run (conventionally) north to south across the site and similarly west to east along the north side of Commercial Road. The various areas collectively referred to Glevum Roman Colonia reflect earlier | <p>Comment noted.</p> <p>Further investigations are required in order to fully substantiate this detail. Further amendments to the Planning Brief will be made, if necessary, during the post-consultation review process.</p> |

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| | | | administrative scheduling processes than the form of the roman city. | |
| 01771 Mr Nigel Spry | COMMENT | Paragraph 2.35 - 2.44 | <p>There seems a disparity between the depth of the background information on the castle/prison and on Blackfriars itself - even in such a document the latter could be expanded for the benefit of users.</p> <p>In the case of Blackfriars, one important aspect has been omitted - the large and potentially densely populated graveyard of the friary that has been shown to exist to the north of Blackfriars Lane; the archaeological significance of this should not be overlooked in this document.</p> | This section has been moved to an Appendix to the document in order that the main body of the text reads better and is not bogged down by lots of background information. The additional information could be added to this appendix, and if necessary will be added at the post-consultation review process. |
| 01771 Mr Nigel Spry | COMMENT | Paragraph 2.39 | Paragraph 2.39. There is a case for adding that the Roman Quay physically survives below ground on a north and then northwest line from the prison towards Westgate street. | Comment noted. Further investigations are required in order to fully substantiate this detail. Further amendments to the Planning Brief will be made, if necessary, during the post-consultation review process. |
| 1397 South West Of England Regional Development Agency | OBJECT | Policy approach - flexibility | The Agency considers that the planning policy framework should allow for greater flexibility in the form of the development to be provided. As such we would welcome less detail in the Policy CA.19 of the Central Area Action Plan and the corresponding Greater Blackfriars Planning Brief in relation to the distribution and mix of uses for the area. This will help to ensure that flexibility is retained to accommodate emerging changes to the scheme which might make the area's regeneration more viable and deliverable. | <p>Disagree.</p> <p>One of the strengths of the Brief is that it promotes a flexible approach, which should be capable of adapting to a variety of proposals within a broad framework.</p> <p>No change proposed</p> |

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| 1397 South West Of England Regional Developmen t Agency | OBJECT | Indicative Capacity | Page 16, Policy CA.19 - 'Indicative Capacity'. The document needs to be clearer about the justification for an emphasis on non-food retail, and if this is not possible, consider widening this to simply 'retail'. This should be carried through to the CAAP. | Disagree. There is a clear emphasis in government policy that the central area should be about comparison goods retail, not convenience goods. No change proposed |
| 1397 South West Of England Regional Developmen t Agency | OBJECT | Paragraph 4.4 | Paragraph 4.4. Greater flexibility required in relation to the particular uses for specific sites. | Disagree. The paragraph begins with the phrase “The sites freed up in this manner could..” which implies a level of flexibility. The objector will be aware that in the recent past there has been and continues to be considerable discussion relating to the possibility of some of the functions of Gloucestershire University transferring to this site. This lends further proof to the flexible approach adopted by the City Council. No change proposed. |
| 1397 South West Of England Regional Developmen t Agency | OBJECT | Paragraph 4.6 | Paragraph 4.6. Rephrase to reflect that the 'cultural quarter' concept is still being tested. | Point acknowledged. Reference added to the findings of the URC study on viability. |
| 1397 South West Of England Regional Developmen t Agency | COMMENT | Paragraph 4.12 | Paragraph 4.12. New development should be of the highest architectural 'and environmental' quality, to support the use of sustainable construction techniques. | Comment noted. However, the brief seeks not only the highest architectural and environmental quality, but also the use of sustainable construction techniques. In such a sensitive area there may be an issue between the two ideals and the need for high quality design in the locally distinctive qualities of the city may not be |

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| | | | | <p>entirely sympathetic with sustainable techniques, and vice versa.</p> <p>No change proposed.</p> |
| 1397 South West Of England Regional Development Agency | COMMENT | Paragraph 4.22 - 4.24 | Paragraphs 4.22 - 4.24. We would welcome greater emphasis on slowing traffic down to make cycling and walking more attractive options. | <p>It is considered that the existing paragraphs address this issue satisfactorily.</p> <p>No change proposed</p> |
| 1397 South West Of England Regional Development Agency | COMMENT | Paragraph 4.25 | Paragraph 4.25. Update to refer to the Regional Spatial Strategy rather than Regional Planning Guidance. Reflect the potential value of the transport plan in reducing car traffic and therefore car parking requirement. | <p>Reference to RPG has already been removed.</p> <p>No change proposed.</p> |
| 1397 South West Of England Regional Development Agency | COMMENT | Paragraph 4.27 | Paragraph 4.27. Given the aspirations for the sustainable mixed-use regeneration of the area, we would welcome more progressive cycle parking standards based on a sustainable mobility approach. | <p>It is considered that the existing paragraphs address this issue satisfactorily.</p> <p>No change proposed</p> |
| 1397 South West Of England Regional Development Agency | COMMENT | Paragraph 4.31 | Paragraph 4.31. This modern new development should aim to achieve a BREEAM assessment rating of 'Excellent'. This reflects the Regional Economic Strategy commitment to encouraging all physical regeneration activity to meet high design and sustainability standards. | <p>The reference to BREAMM standards has now been removed (and consulted upon).</p> <p>No change proposed.</p> |
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| 1369 National Offender Management Service | COMMENT | The Prison | We would welcome an opportunity to discuss in further detail the inclusion of the prison as a housing/mixed-use allocation with the Council. | Comment noted. |
| 0231 The Gloucester Quays Partnership | SUPPORT | The Brief | <p>The revised draft Briefs are in the main supported, being consistent with emerging core LDF documents as well as pertinent national planning guidance.</p> <p>Welcome the Council's commitment to the continued regeneration of Gloucester and in particular the City Centre areas identified in the Briefs. The proposed development of the planning brief areas in the manner proposed is considered likely to enhance the profile and attractiveness of the city in general and will compliment existing developments including Gloucester Quays. Continued investment and regeneration will enhance Gloucester's status as a SSCT in the southwest.</p> | Comments of support noted. |
| 0445 Environment Agency | COMMENT | The Brief | We are unable to support site allocations in Flood Zones 2 or 3 as they have not been informed by a Strategic Flood Risk Assessment. | <p>Comment is acknowledged.</p> <p>The City Council's SFRA was not required at the time of the original brief and was not completed until September 2008. This Brief will be revised to take into account the comments of the EA and the contents of the SFRA.</p> |
| 0445 Environment Agency | COMMENT | Paragraph 4.49 Flood Zones | Paragraph 4.49. This paragraph states that parts of the area included within the Brief are located within Flood Zones 2 and 3. Notwithstanding the need for a Sequential Test (see Annex D of | The City Council considers that the para concerned rightly places the onus on the developer to progress the relevant development site with the EA in order to address the sequential test and vulnerability issues |

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| | | | PPS25), only less vulnerable and water compatible uses are appropriate in Flood Zone 3 (see table D2 and D3 of PPS25). The SPD should reflect this. | referred to. No Change proposed. |
| Officer Comment | COMMENT | Conservation Areas | Since the publication of the last draft Greater Blackfriars Planning Brief, the Council has adopted as interim supplementary policy a number of Conservation Area Assessment and Management Documents. | Paragraph 2.31 has been revised to take this into account. |
| Officer Comment | COMMENT | Trees and Tree Preservation Orders | | Information at paragraphs 2.40 – 2.41 amended and expanded upon to provide more detail and clarity. Additional information added at paragraphs 4.40 – 4.41 to provide more detail and clarity regarding the Council's approach towards new tree planting within the area. |
| Officer Comment | COMMENT | National Planning Policy | | Information at paragraphs 3.2 – 3.5 amended to provide greater clarity. |
| Officer Comment | COMMENT | Regional Planning Policy | | Information at paragraph 3.6 amended to reflect most up-to-date situation with regard to the Regional Spatial Strategy for the South West. |
| Officer Comment | COMMENT | Local Planning Policy – Development Affecting Sites of the Historic | Since the publication of the last draft Greater Blackfriars Planning Brief, the Council has adopted as interim supplementary policy an SPD entitled 'Development Affecting Sites of the Historic Environment'. | Text has been added at paragraphs 3.10 – 3.13 to make reference to this document. |

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| | | Environment SPD | | |
| Officer Comment | COMMENT | Local Planning Policy – Heights of Buildings SPD | Since the publication of the last draft Greater Blackfriars Planning Brief, the Council has adopted as interim supplementary policy an SPD entitled 'Heights of Buildings'. | Text has been added at paragraphs 3.14 – 3.16 to make reference to this document. |
| Officer Comment | COMMENT | Local Planning Policy – Joint Core Strategy | Since the publication of the last draft Greater Blackfriars Planning Brief, the Council has embarked on the preparation of the Joint Core Strategy with Cheltenham Borough and Tewkesbury Borough Councils. | Text has been added at paragraphs 3.19 – 3.20 to make reference to the Joint Core Strategy. |
| Officer Comment | COMMENT | Local Planning Policy – Gloucester Heritage Urban Regeneration Company | The revised draft Greater Blackfriars Planning Brief is being consulted upon alongside a masterplan that has been prepared by the GHURC and conjunction with consultants. | Text at paragraph 3.26 amended to reflect this. |
| Officer Comment | COMMENT | Urban Design Considerations | | Changes have been made to the urban design text and plan (paragraphs 4.6 – 4.14 and urban design plan). |
| Officer Comment | COMMENT | Pedestrian and Cycle Access | The via sacra is considered to be an important element of the city centre – though at present it is on need of some improvement. | Text has been added to highlight the importance of the via sacra, and the need for it's incorporation into any scheme. |

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| Officer Comment | COMMENT | Car Parking | | Reference to national guidance relating to car parking, which will be taken into account when considering parking design proposals for the area has been included. |
| Officer Comment | COMMENT | Validation checklist | | Reference to the Council's new planning application validation checklist added at paragraph 4.77. |

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