

**'Draft Greater Blackfriars Planning Brief' Supplementary Planning Document**  
**Schedule of Comments Received and Proposed Changes**

Main Changes Proposed:

- Additional text added relating to the replacement of Kimbrose Triangle
- Additional text added relating to the potential relocation of the prison and the need for a suitable replacement site to be identified through further discussions with key stakeholders
- Additional site-specific obligation added relating to the requirement for an archaeological assessment to be submitted
- Key design principles amended to allow for potential development block along northern edge of proposed square north of Blackfriars subject to the retention of key views and for alternative pedestrian routes (east-west) allowing for key views and taking into account the medieval street pattern
- Urban design text amended to include reference to archaeology
- Reference to parking standards updated to refer to the Second Gloucestershire Local Transport Plan 2006 – 2011
- Policy CA19 amended to refer to 'retail' rather than 'comparison goods' retail to provide additional flexibility
- Reference to eco-homes replaced with reference to 'Code for Sustainable Homes'
- Additional reference to climate adaptation and waste minimisation

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
0298 Mr & Mrs D Daw	Comment	Riverside	<p>We refer particularly to the riverside from the Prison to the Old Custom House. Here is another great opportunity for stunning dwellings facing the river. Other towns have done it and Gloucester needs to do the same - perhaps even a new riverside village. Please be aware of endless apartments here.</p> <p>Employment/commercial opportunities could sit behind the river frontage.</p> <p>Bars and restaurants are better sited at the Docks, Westgate etc. Gloucester needs to encourage city dwellers with spending power that will enrich shops and businesses. The city needs people who will care about the town and not abuse it or drag it down.</p>	<p>Comments noted. Residential units facing the riverside could be an appropriate response within the local area. The Brief is consistent with the GHURC Framework Plan and Policy CA19 already makes reference to this issue. A mix of different uses would help to add vitality and interest to the area.</p> <p>Disagree. Bars and restaurants could potentially be incorporated into this area as part of mixed-use development, providing an attractive outlook over the river and beyond. Such commercial elements would add activity and interest along The Quay through the provision of active frontages.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
0299  Gloucester Civic Trust	Comment	Greater Greyfriars Planning Brief	<p>1. Greater reference should be made in the Planning Brief to the replacement of the gyratory around Kimbrose Triangle. Paragraph 4.17 should be strengthened to ensure that this important objective is achieved.</p> <p>2. Strong support was expressed for the development of new cultural uses in this location in order to allow Gloucester to compete more effectively with other places including Cheltenham.</p> <p>3. Support for a new theatre within the Shire Hall complex.</p> <p>4. The Trust felt that if the prison were to relocate this would provide an excellent opportunity for the development of new townhouses along The Quay, which would help create a stronger frontage to the riverside.</p> <p>5. The Trust strongly supported the concept of a new 4* hotel in this location and emphasised the poor quality of existing hotel provision within the City Centre.</p>	<p>Agree. The replacement of the gyratory is an important objective and work is progressing between the City and County Councils to bring forward a traffic and environmental enhancement scheme in this area including the introduction of two-way working and improved pedestrian links. Amend text at paragraph 4.17 to provide an update on the progress being made.</p> <p>2. Support noted. Additional text added at paragraph 4.6 referring to the recent cultural uses viability study carried out on behalf of the GHURC.</p> <p>3. Support noted.</p> <p>4. Agree. The prison site could be suitable for residential development as part of a mixed-use scheme. A stronger frontage to the riverside would be desirable as the area is at present poorly defined and overlooked and functions merely as a route between the docks and the western approach to Gloucester, and not as a space in itself.</p> <p>5. Support noted.</p>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
0299 Gloucester Civic Trust (cont.)	Comment	Greater Greyfriars Planning Brief	<p>6. Support for the provision of new pedestrian linkages through the site to The Quay in order to promote permeability and movement.</p> <p>7. Blackfriars is a key site and a high quality development should be sought.</p>	<p>6.Support noted.</p> <p>7. Support noted. The planning brief emphasises the importance of achieving high quality design including a number of key design principles that will guide development proposals in this area. The GHURC Design Review Panel will also continue to assess proposals. Additional text has been added (para. 4.60) requiring any residential element to achieve level 3 in the new code for sustainable homes.</p>
0388 MWA Planning and Development Consultancy	Object	Telephone Exchange	<p>BT objects to any part of the policy that would support the redevelopment of the Telephone Exchange building. Specific reference to the potential demolition is made at paragraph 8.85.</p> <p>BT will resist the loss of this site and the BT car park on operational grounds.</p> <p>Amend policy to reflect importance of the Telephone Exchange including BT's operational requirements.</p>	<p>Objection noted however the BT building is very unattractive and its redevelopment would significantly benefit the area. The inclusion of the BT telephone exchange building and other land within the brief area enables discussions with BT to investigate how their operational needs can be met while achieving the best possible scheme. No change.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1369  National Offender Management Service (NOMS)	Comment	HMP Site	<p>It is acknowledged that the Planning Brief would naturally focus on opportunities and principles, as opposed to detailed proposals and programmes, but the fact that the document has gone to the extent of allocating the HMP site as a redevelopment opportunity raises the following issues for the way forward:</p> <ol style="list-style-type: none"> <li>1. Neither the National Offender Management Service (NOMS) nor HM Prison Service have held discussions with Gloucester City Council about any possible change at HMP Gloucester.</li> <li>2. Consequently no site searching activity has been carried out by NOMS to consider alternative locations for HMP Gloucester.</li> <li>3. It is assumed that Gloucester City Council has not undertaken any work to identify potential relocation sites</li> <li>4. The previous consultation of the LDF contained no specific references or policies in relation to NOMS activity and as a result, there is currently no policy context that we have been made aware of by the Council that would positively facilitate the relocation of HMP Gloucester.</li> </ol>	<p>Comments noted. The planning brief and associated policy in the draft Central Area Action plan simply allude to the fact that should the prison site become available for alternative forms of development, a number of new uses would be suitable in that location and that potentially these could be brought forward as part of a comprehensive redevelopment scheme for the whole area.</p> <p>It is acknowledged that further discussions with NOMS are needed and Officers are seeking to arrange a meeting accordingly. Additional text inserted at paragraph 4.3 to refer to the issue of relocation and further discussions between relevant parties being needed to progress this issue.</p>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
1369  National Offender Management Service (NOMS)	Comment	HMP Site	<p>5. The timetable/programme for the redevelopment is undefined.</p> <p>6. Whilst welcoming the consultation documentation's approach and direction, there are many unknowns with regard to the redevelopment of the HMP Gloucester land holding and in moving forward, we would be extremely interested in gaining a clearer insight into the Council's intentions, potential mechanisms and possible timetable for the realisation of this exciting opportunity.</p>	The support 'in principle' for the redevelopment of the prison site is noted and welcomed.
1445  Gloucestershire County Council	Support	Archaeology	<p>1. The introductory section on archaeology recognises and briefly describes the diverse range of archaeological sites present within the area covered by the planning brief.</p> <p>2. In view of the extent and significance of the archaeological remains it is recommended that reference is also made to archaeology in the site specific obligations and in the urban design section. If archaeological and development needs are to be reconciled it will be essential that the design process is informed by detailed knowledge of the archaeological remains on the site and the policy requirements for preservation and mitigation of impact.</p> <p>3. The proposals to improve the setting of and access to, Blackfriars priory are supported.</p>	<p>Disagree. The archaeology section of the Brief already outlines the diverse range of archaeological sites within the area. Further elaboration is not considered necessary.</p> <p>Agree. Amend text at para. 4.1 to insert reference to a site-specific obligation regarding the need for an archaeological assessment to be submitted in support of any development proposal within the planning brief area.</p> <p>Also amend text in the urban design section at para. 4.12 to refer to the importance of archaeology in this area.</p> <p>Support noted.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1449 Gloucestershire County Council	Comment	Parking Standards	Paragraph 4.25 Pleased to see reference to Regional Parking Standards, however the emerging Regional Spatial Strategy does not contain parking standards and it would therefore be better to refer to the Local Transport Plan standards.	Agree. Amend text at para. 4.25 to state that, 'The vehicle parking standards set out in the Second Gloucestershire Local Transport Plan 2006 – 2011 will be used as a basis for assessing maximum provision.
1450 Gloucestershire County Council	Comment	Planning Obligations	<p>Various comments are made throughout the Central Area Action Plan and the Site Allocations &amp; Designations (Non-Central Area) papers about infrastructure which generally is supported. However, there are various threads and the drafting is not specific. A single commentary should refer to the extended range of services provided by the County Council - e.g. page 23 paragraph 4.56 "Greater Greyfriars Planning Brief" is supported but requires extension or clarification. This representation is applicable to all development areas to ensure appropriate infrastructure of all types is secured in conjunction with the County Council.</p> <p>Add additional comment to all supplementary planning documents under planning obligations heading:- "Education, Community, Fire and Rescue, Transportation" Developers are advised to contact Gloucestershire County Council as early as possible for advice and discussion on the following matters for which that Council is responsible.</p>	<p>Disagree. The City Council promotes a development team approach whereby all parties to planning obligations resulting from a development agree, pre-application, the paramount obligations to be pursued from any development. This should ensure a more equitable distribution of resources between highways, education, affordable housing, community services, sustainable transport and public open space.</p> <p>Furthermore, the recent establishment of a S106 Project Group, involving city and county officers, will further ensure a co-ordinated approach to S106 contributions.</p>

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1450  Gloucestershire County Council	Comment	Planning Obligations	Infrastructure requirements will vary for each site and will be required by way of negotiation in relation to the impact of that individual proposal. The extent of infrastructure depends on the nature of the development but may include contributions in the form of finance, land or works towards education (at children's centre, primary and secondary levels), community functions (Libraries, services for Youth, Elderly and Disabled), Transportation and Highways (in conjunction with Gloucester City Council) and Fire and Rescue."	See response above.
Jessica Potter South West Regional Development Agency (SWRDA)	Support	Whole document	The South West RDA welcomes the alignment between Gloucester's emerging LDF and the Area Regeneration Framework produced by Gloucester Heritage URC. This will be vital to the successful and comprehensive delivery of a renaissance for the central area.	Support noted.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Whole document	<p>In the specific context of the Greater Blackfriars area, the Agency considers that the planning policy framework should allow for greater flexibility in the form of development to be provided.</p> <p>We would welcome less detail in Policy CA19 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.</p> <p>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>	<p>Disagree. Whilst the planning brief is intended to provide a policy framework against which to determine development proposals that come forward, it does not preclude the possibility of different schemes emerging and being considered favourably. The basic premise of the brief is for a comprehensive mixed-use redevelopment of the area. This approach is consistent with national planning policy relating to the re-use of previously development land and buildings. Should a development proposal come forward that is different from the land uses prescribed in the planning brief and associated policy of the central area action plan, this will be considered on its merits based on the general principles of the brief and policy.</p> <p>As worded, neither the brief nor policy, are considered to be overly prescriptive or inflexible. No change.</p>
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Page 16 – Policy CA19 – 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'.	<p>Comment noted. It is acknowledged that it may be appropriate to include an element of convenience as well as comparison goods retail within any development scheme for this area. The important factor is considered to be the scale of units, which should be small in scale to promote specialist retail and an offer that compliments rather than competes with the proposals for the bus station.</p> <p>Amend text at paragraph 4.1 under Policy CA19 to refer to small-scale retail rather than 'comparison goods' retail in order to allow for both food and non-food shopping whilst maintaining the objective of promoting small-scale specialist retailing in this area.</p>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Page 17 – Paragraph 4.4	Greater flexibility is required in relation to the particular uses for specific sites.	Disagree. For the reasons set out above, paragraph 4.4 is not considered to be insufficiently flexible. It simply sets out a number of ideas and principles for how this key regeneration site could be taken forward. Any proposal that comes forward will be considered on its merits. The planning brief simply provides a policy framework against which to judge any such proposal. No change.
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Page 18 – Paragraph 4.6	The text should be re-phrased to clarify that the ‘cultural quarter’ concept is still being tested.	Agree in part. Add additional text to paragraph 4.6 to state that a viability study on the potential use of Blackfriars as a focus for ‘cultural’ uses has been produced on behalf of the GHURC.
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Page 20 – Paragraph 4.12	Amend text to state that ‘new development should be of the highest architectural <u>‘and environmental’</u> quality’, to support the use of sustainable construction techniques.	Agree. Amend text of paragraph 4.12 to refer to both architectural and environmental quality. This links to paragraph 4.60, which refers to the provision of new homes built in accordance with the new code for sustainable homes.
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Page 22 – Paragraphs 4.22 – 4.24	SWRDA would welcome greater emphasis on slowing traffic down to make cycling and walking more attractive options	Agree. Add text at paragraph 4.22 to state that <b>‘Proposals that would help to reduce the speed and volume of vehicular traffic using the area will be supported’</b> .

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
Jessica Potter South West Regional Development Agency (SWRDA)	Object	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 requirements.	Agree in part. The Regional Spatial Strategy does not include car parking standards. Instead, amend text at paragraph 4.25 to refer to the parking standards set out in the Second Gloucestershire Local Transport Plan 2006 – 2011.
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Page 22 – 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.	Comment noted. Amend text at para 4.27 to refer to the cycle parking standards set out in the Gloucestershire Local Transport Plan 2006 – 2011.
Jessica Potter South West Regional Development Agency (SWRDA)	Object	Page 23 – 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 highest design and sustainability standards.	Agree in part. The Eco-Home BREEAM assessment has been replaced by the new Code for Sustainable Homes. Amend paragraph 4.31 to delete reference to eco-home provision and insert additional, new section on achieving the Code for Sustainable Homes Level 3 (equivalent to the old Eco-Home rating of 'very good').
Michael Pullon – Gloucester City Council Community Forum	Comment	Paragraph 2.51 – Gulls	The requirement to take note of the Council's publication 'Gulls – How to Stop them nesting on your roof' should be mandatory.	Agree. Amend text to state. 'Any development <b>will be required to take into account</b> <del>should take note of</del> the Council's publication 'Gulls – How to Stop them Nesting on Your Roof'.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
Michael Pullon – Gloucester City Council Community Forum	Comment	Page 19 – Views of the Cathedral	The key views of the Cathedral are blocked by the Shire Hall annex, not Shire Hall.	Comment noted. Amend text at para 4.11 accordingly.
Michael Pullon – Gloucester City Council Community Forum	Comment	Paragraph 2.42 – Medieval Quay	It is believed to be to the west and not the north of the present Westgate Street.	Agree in part. This has been checked with the City Council Historic Environment Team. Amend text at para. 2.42 to state that, 'The first medieval quay lay to the north <b>and west</b> of present day Westgate Street'.
Gerald Dee – Gloucester City Council Community Forum	Comment	Pedestrian links	There is a real need to upgrade pedestrian links within this area, particularly between the City Centre and the Docks.	Agree. The planning brief seeks to facilitate the provision of improved pedestrian linkages through this key area. No change.
David Bush – Gloucester City Council Community Forum	Support	Blackfriars	Blackfriars should be the priority site for a 4* hotel.	Agree. The planning brief emphasises that Blackfriars is the Council's priority site for a new 4* hotel. No change.
Dennis Collins – Gloucester City Council Community Forum	Comment	Hotel provision	What evidence is there of the need for additional hotel provision?	It is a fact that Gloucester has a shortage of bedspaces compared to other historic cities of comparable size. Hotel provision in the City Centre is particularly limited and this is reflected in the relative lack of overnight visitors to Gloucester compared to day visitors.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
Officer Comment	Comment	Nature Conservation	To be consistent with the other planning briefs, additional text on nature conservation and biodiversity should be included.	Amend text to include additional reference to biodiversity and nature conservation.
Officer Comment	Comment	Waste Minimization	The Council now promotes waste minimization in new development in line with the Gloucestershire County Council Waste Minimization Supplementary Planning Document. Reference to waste minimization should be made.	Amend text to include reference to waste minimization.
Officer Comment	Comment	Climate Change	Given the publication of the supplement to PPS1 on climate change, reference should be inserted to climate adaptation. Also insert reference to the Code for Sustainable Homes, which has replaced the Eco-Home standard.	Amend text accordingly.
Officer Comment	Comment	Principles and Opportunities Plan	Recent work undertaken by consultants Feilden Clegg on behalf of the Gloucester Heritage Urban Regeneration Company has highlighted the potential benefits of introducing a new 'block' of development along the northern edge of the proposed open space to the north of the Blackfriars Friary, which would form a distinct edge to the square and create the possibility of interesting 'glimpsed' views of the Cathedral as opposed to a single straight vista.	The revised planning brief has been amended to refer to the possibility of a development 'block' being created along the northern and possibly western edge of the proposed public space north of the Blackfriars Friary subject to the retention of key views. This would result in a smaller public space but a potentially better defined area with more natural, 'glimpsed' views of the Cathedral and other key landmarks.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
Officer Comment	Comment	Principles and Opportunities Plan	<p>The Feilden Clegg work has also identified a possible alternative route for the proposed new link from The Quay to Ladybelle Gate Street.</p> <p>The revised planning brief should take account of these recent changes in approach by introducing additional flexibility.</p>	The brief has also been amended to allow for an alternative route from The Quay to Ladybelle Gate street, potentially having regard to the historic street pattern and particularly having regard to the importance of views to key landmarks.
Officer Comment	Comment	Para. 2.31 – Conservation Areas	Update to reflect recent changes to the City's Conservation Area boundaries	Agree. Amend paragraph 2.31 accordingly.
Officer Comment	Comment	Scheduled Monuments	Scheduled Ancient Monuments (SAMs) are no longer called Scheduled Ancient Monuments, they are just Scheduled Monuments.	Agree. Delete reference to Scheduled Ancient Monuments and replace with reference to Scheduled Monuments throughout the document.
Officer Comment	Comment	Para 4.15 – Housing Mix	Should be referred to in the context of the Government's sustainable communities agenda.	Agree. Insert reference at para. 4.15 to the issue of housing mix and the creation of sustainable communities.

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**Schedule of Comments Received and Proposed Changes**

Main Changes Proposed:

- Greater reference to the protection of the historic environment including reference to roman and medieval city walls and associated defences and the need for a full archaeological assessment and evaluation, plus added reference to national planning policy on the protection of the historic environment
- Reference to Constitution House inserted into brief. Text of the brief to specify the need for any proposed new development to respect the setting of Constitution House.
- Vehicular and cycle parking standards updated to refer to the Second Gloucestershire Local Transport Plan 2006 – 2011.
- Additional text inserted relating to biodiversity, climate adaptation, waste minimisation and renewable energy generation
- Reference made to updated Conservation Area boundaries

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
0299  Gloucester Civic Trust	Comment	Greater Greyfriars Planning Brief	<p>Points as follows:</p> <p>1. The concept plans contained in each brief could be made clearer by the inclusion of more reference points; road names, landmark buildings etc.</p> <p>2. More reference should be made in the brief to the exposure of the Roman Wall and its potential use/benefits as a tourist attraction in this location.</p>	<p>1. Disagree. The plans are considered to be sufficiently clear, enabling identification of key roads, buildings and landmarks.</p> <p>2. Comment noted. It is anticipated that the potential for exposing the below ground archaeology is overstated, but further archaeological investigation is needed to establish the form, extent and quality of the surviving archaeology before a final decision on future management is made. In these circumstances agree that the brief text should reflect this. Amend Urban Design considerations, para 4.1 Point 6.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
0299  Gloucester Civic Trust (cont.)	Comment	Greater Greyfriars Planning Brief	<p>3. The Trust have previously objected to a proposed use on the existing bowling green site although this was based on the nature of that use rather than the principle of the bowling green being built on. It was felt the proposal for a youth facility at a proposed cost of £28,000 for a short-lived term a waste of taxpayer's money. It was also felt insufficient consultation had been carried out and that the facility is for the use of just one faith and not multi faith as suggested.</p> <p>4. Concern was expressed that regeneration proposals such as the one planned for the Greyfriars area are being undermined by 'anti-social' uses in close proximity. Whilst the Trust acknowledge the need for emergency accommodation and other similar uses, they felt that future projects should be located in other parts of the City where they would not undermine quality regeneration schemes coming forward. Gloucester Civic Trust feels this is a very important point to ensure Gloucester is regenerated in a sensitive and fitting way.</p> <p>5. It was suggested that the LDF could include a policy on the location of emergency accommodation and other similar uses</p>	<p>3. Comment noted. Subject to a number of considerations, including archaeological investigations, the brief allows for the potential redevelopment of the former bowling green. No change made.</p> <p>4. Disagree. There are no 'anti-social' uses near the site. The existence of emergency forms of accommodation in the City Centre will not detract from the quality and success of the redevelopment of the existing Gloscat sites. No change.</p> <p>5. This is an issue for the Action Area Plan DPD. Proposals for emergency forms of accommodation are considered on their merits should they arise and it is not considered necessary to have a specific locational policy for this type of use. No change to this Brief.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
0299  Gloucester Civic Trust (cont.)	Comment	Greater Greyfriars Planning Brief	<p>6. The Trust emphasised the importance of high quality housing in order to effectively promote City Centre living including a requirement/obligation to ensure a mixed range of housing sizes.</p> <p>7. The brief should more fully address the need to improve the setting of Constitution House e.g. by reducing the extent of the proposed development block and providing a better buffer</p> <p>8. Potential to re-locate the Aviation Garden with the model planes provided in an indoor setting elsewhere - with Developer setting aside money for restoration of the sculptures and installation of wall plaques for each one.</p> <p>9. Importance of preserving the setting of the library</p> <p>10. More reference should be made to the future of the Rikenel Centre when the proposed NRC on the Gloscat media site is built.</p>	<p>6. Comment noted. The brief allows for a mix of dwelling types, including town houses, apartments, affordable housing and lifetime homes, of varying bedroom numbers. The urban design principles and requirements of the brief will help to ensure that a high quality scheme comes forward. No change made.</p> <p>7. Agree in part. The 'Principles and Opportunities Plan' included within the Planning Brief is for illustrative purposes only. Insert additional text to ensure that the setting of Constitution House is respected.</p> <p>8. Agree. The possibility of relocating the Aviation Garden planes within the development of the area should be flagged up in the Brief. Make reference in Urban Design considerations Para 4.1, point 3.</p> <p>9. Comment noted. The Brief requires any new development that is adjacent to the library to be of a high quality and innovative design and which enhances the setting of the Grade II Listed Library building. No change made.</p> <p>10. This is not an issue for the Planning Brief to consider. No change made.</p>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
0299  Gloucester Civic Trust (cont.)	Comment	Greater Greyfriars Planning Brief	<p>11. The Trust supports the proposal to convert St. Michael's Square (car-park) to public open space. The issue of resident parking needing to be satisfactorily addressed should not be an issue. The Community Groups' preliminary design proposals have already shown the ability to offset a significant proportion of the spaces that will be lost from the central car-park area by the provision of additional chevron style parking (similar to Brunswick Square) around the perimeter of the Square. Whilst it is accepted there will be a small net loss of parking spaces, the present low resident usage of the available parking (issued numbers of resident permits) would likely not be affected. The present general level of usage of the car-park has perhaps been overstated as it is generally known that it is never usually full.</p> <p>12. The Trust supports the idea of building right up to the frontage of Brunswick Road in relation to the media site and agreed that this would create a stronger 'edge' to Brunswick Road</p>	<p>11. Comment noted. It is important that the number of car parking spaces within the city centre is properly managed in order to maintain its vitality. A car parking strategy is currently in preparation which will help determine at what stage St Michaels Square can be fully reverted back to a public open space. No change made.</p> <p>12. Support noted. No change.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
0445 Environment Agency	Comment	Sustainable Drainage Techniques	Welcome the Council's support of sustainable drainage techniques. Whilst the site is not located within an identified Flood Zone, any redevelopment of the site will require attenuation.	Support noted.
0445 Environment Agency	Support	Retention of Mature Trees	Support the proposals to retain as many mature trees as possible on the site, the requirement to use native planting wherever possible and reference to the opportunity to encourage wildlife.	Support noted.
0516 Mr Gerald Tween (Gloucester City Council Community Forum)	Support	Greyfriars Open Space	Support the proposal to create a high quality area of open space around the Greyfriars monument.	Support noted.
0517 Mr Michael Pullon (Gloucester City Council Community Forum)	Comment	Ownership	Questioned whether Barnwood House Trust was the owner of Sir Thomas Rich's Cap Park as stated in the Brief. Believes it is in fact 'Gloucester City Charities'	The owner of Sir Thomas Rich's Car Park is understood to be Gloucester United Schools Charity.  Amend text accordingly.

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0517  Mr Michael Pullon (Gloucester City Council Community Forum)	Comment	Brief Boundary	Urban Design, Item 10 (areas to be upgraded) – this is outside of the Greater Greyfriars boundary.	<p>Comment noted. However, any upgrade to this area would be secured through a S106 agreement, which are not confined to the boundaries of planning applications.</p> <p>This is still seen as a worthwhile objective.</p> <p>No change made.</p>
0517  Mr Michael Pullon  (Gloucester City Council Community Forum)	Comment	Page References	<p>Map is on page 4, not 6 as noted.</p> <p>Paragraph 1.14 should state page 25, not page 29.</p>	Agree. Amend text accordingly.
0517  Mr Michael Pullon	Comment	Shopping Centre	The shopping centre is called The Mall Southgate, not The Mall Eastgate.	Since the publication of the Brief for informal consultation in August the shopping centre has now changed its name to 'The Mall Gloucester'. Amend text accordingly.

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
0517  Mr Michael Pullon  (Gloucester City Council Community Forum)	Comment	Listed Buildings	Paragraph 2.17, 'Constitution House' has been repeated twice and should be amended to read 'Constitution Walk'.	Agree. Amend text accordingly.
0942  English Nature	Comment	Biodiversity Content	Standard paragraph for every planning brief.  These planning briefs varied quite widely in their biodiversity content with some of them making helpful suggestions and others being fairly sparse. It would be useful if all the briefs can be reviewed to give a much stronger steer for developers and planners on how they can provide for biodiversity within the individual areas.	Agree. Insert additional text relating to nature conservation and biodiversity.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1265 Mrs L Symington	Comment	Parliament Street	<p>I live on a road that is residential (Parliament Street). However, it would appear this is quite inconsequential to the planners of transport routes. I have lived here nearly ten years and the constant flow of traffic has increased horrendously. During the summer months it is impossible to sit in the front of the property with the windows open because of the noise from buses, lorries and other traffic, and it is also polluting the atmosphere. I would suggest that a minimum of seventy or eighty single and double Decker buses use this road daily. The road is very narrow not at all conducive to modern day demands - what of the deterioration to the residents health, safety, and the properties along the road.</p> <p>Whilst all the planning is ongoing for the regeneration of this area please, please can some thought be given to the residents of Parliament Street for a healthier and happier life style within the city?</p>	<p>Parliament Street's use as a main bus route is a strategic transport issue that is not a consideration for this brief.</p> <p>However, a scheme of this size will require the submission of both a transport assessment and a travel plan with the planning application. The aim of a transport assessment is to consider the transport implications of a proposed development.</p> <p>Further, a travel plan is a package of measures agreed between the developer and the Council aimed at reducing the use of the private car, and encourage the use of alternative modes of transport.</p> <p>The Council will seek to ensure the targets contained within the travel plan are met through the use of a planning agreement or planning condition. The Brief requires the completion of both. No change made.</p>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
1374  Mapeley Estates Limited	Support	High Quality Design	<p>We welcome the Council's approach to this strategic regeneration programme.</p> <p>It is encouraging to see the emphasis on requiring high quality treatments that respect and character and appearance of the Brunswick Square Conservation Area, as well as the general presumption in favour of retaining building and spaces that contribute positively. References to respecting the amenities of the occupiers of neighbouring properties in terms of overlooking, loss of privacy and overshadowing amongst others are reassuring principles. The fact that the guidance calls for master planning and a requirement for Townscape Analysis work and Design Statements early on as part of any planning application is further comfort.</p>	Support noted. No change.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
<p>1384</p> <p>Stephanie and Stella Fussell</p>	<p>Object</p>	<p>Removal of Trees</p>	<p>Strongly object to the removal of the mature trees at Gloscat Media Centre or any other trees in the Greater Greyfriars area. It is pointless incorporating them into a Conservation Area if the trees are going to be destroyed - they can easily be incorporated into a landscaped garden as the majority of them are next to the wall along Brunswick Road.</p> <p>Due to climate change, vandalism and neglect, their replacement with saplings is no longer a viable option - 8/10 don't make it past the first ten years. Furthermore their roots are unable to tap into underground water sources for a number of years.</p> <p>Trees provide many benefits and should therefore be kept.</p>	<p>Comments noted. The Brief allows for the removal of trees to the front of the former Gloscat Media Centre on Brunswick Road, subject to their satisfactory replacement elsewhere in the scheme. This is to allow the reinstatement of the building line along Brunswick Road.</p> <p>With regards to other trees, the whole of the brief area is contained within Conservations Areas, meaning that permission will be required for the felling or works to any tree.</p> <p>There is a presumption in favour of all other trees being retained where possible, and therefore any applications for the felling of trees would need to be supported by a full, robust, and satisfactory justification for their removal. Again, suitable replacements would need to be made elsewhere on site.</p> <p>The Brief also encourages new tree planting where possible.</p> <p>No change made.</p>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
1441  Duddington House Properties	Comment	Site Boundary	<p>We consider the site of the former 'Jumpin' Jacks' nightclub at 7 Brunswick Road should be included within the brief as a development site. The site is located adjacent to the Gloscat Media Site and is currently vacant. It has the potential to deliver a mixed-use scheme including an active frontage at the ground floor comprising restaurant or retail uses and residential development above.</p> <p>We consider a new bullet point should be added under 2.3 worded as follows:</p> <ul style="list-style-type: none"> <li>- Former site of 'Jumpin Jacks' nightclub, 7 Brunswick Road - approximately 0.13 hectare</li> </ul>	<i>Note: This comment has been withdrawn. No response necessary.</i>
1441  Duddington House Properties	Object	Affordable Housing	<p>Whilst we recognise that an indicative target of 15 units or more is given in draft PPS3 'Housing' we would like to point out that this document is still in draft form and does not represent adopted government policy.</p>	<i>Note: This comment has been withdrawn. No response necessary.</i>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1441 Duddington House Properties (cont.)	Object	Affordable Housing	Current national guidance in relation to affordable housing is set out within Circular 6/98 which gives a target of housing developments of 25 or more dwellings or residential sites of 1 hectare or more, irrespective of the number of dwellings. The Circular indicates that if a Council wish to adopt a lower threshold then the lower threshold must be justified through the local plan process.	<i>Note: This comment has been withdrawn. No response necessary.</i>
1441 Duddington House Properties	Comment	Inclusion of Site	<p>We consider a new point 16 should be added after 4.1.15 in this section and a new number should be added to the Greater Greyfriars Principles and Opportunities Plan to identify the Jumpin Jacks site. The new point should be worded as follows:</p> <p>'There is the potential to create a new development on the site of the former 'Jumpin Jacks' nightclub on the corner of Brunswick Road and Jennings Walk. New development should be of the highest architectural quality, particularly to the front of the site to preserve or enhance the character of the conservation area.</p>	<i>Note: This comment has been withdrawn. No response necessary.</i>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
1441  Duddington House Properties	Comment	Building Heights	<p>We consider that a separate paragraph should be added after point 4.5 in this section specifically relating to building heights. The supporting text of Policy CA18 - Greater Greyfriars of the Central Area Action Plan paragraph 8.37 states that:</p> <p>'New development should reflect the prevailing building heights (typically 3-4 storeys). It is, however appropriate to increase the building height to 4 or 5 storeys in certain places in order to reinforce the city edge. Buildings of this height, however, must be considered in relation to the surrounding character and the impact on the city's skyline and views to the Cathedral.'</p> <p>The purpose of the brief is to expand on Policy CA18 and provide more detailed guidance on the requirements of the LPA in relation to this area. Therefore we consider that this paragraph should be developed and explained in more detail within the planning brief. Currently clear guidance on suitable building heights is only indicated in relation to Gloscat Main site. There should be more guidance provided within the brief as to building heights across the entire brief area to provide detailed guidance to landowners and developers.</p>	<p><i>Note: This comment has been withdrawn. No response necessary.</i></p>

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
1441  Duddington House Properties	Object	Family Housing	<p>Paragraph 4.6 indicates that 'residential development within the brief area will be expected to include a mix of dwelling types including homes that are suitable for families.'</p> <p>This implies that family housing will need to be provided in all residential development within the brief area. However, family housing will not always be appropriate in all locations. In line with government guidance, the policy approach should be to increase densities and maximise the development potential of city centre sites as appropriate. Family housing may not always be appropriate in such instances, particularly as part of mixed-use development and where private amenity space more suited to families cannot be provided. This is recognised in Policy CA36 of the draft Area Action Plan which refers to provision of family housing 'on appropriate sites'. Additionally, as far as can be reasonably controlled within land use policies, the dwelling mix of a development and the likely life styles of intended inhabitants should be compatible.</p>	<i>Note: This comment has been withdrawn. No response necessary.</i>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1441 Duddington House Properties (cont.)	Object	Family Housing	<p>The brief should provide flexibility for developers to provide an appropriate dwelling mix on each site. We therefore consider that the policy should be reworded as follows:</p> <p>'...residential development within the brief area will be encouraged to include a mix of dwelling types including homes that are suitable for families where appropriate and having regard to the characteristics of the site.'</p>	<p><i>Note: This comment has been withdrawn. No response necessary.</i></p>
1445 Gloucestershire County Council	Comment	Archaeology	<p>Reference should be made to the comments provided in respect of this site in the Central Area Action Plan. In addition the following recommendations are made:</p> <p>1. Scheduled monuments: It is recommended that the two separate paragraphs describing the scheduled monuments on this site are brought together and that the planning policy presumption in favour of the preservation of scheduled monuments, other nationally important archaeological remains and their settings is stated.</p>	<p>1. Agree. Amend text accordingly.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1445  Gloucestershire County Council (cont.)	Comment	Archaeology	<p>2. It should also be clear that the whole of the area covered by the development brief, not just the scheduled areas, is of potential archaeological significance. In view of this it is recommended that the appropriate Gloucester City archaeology policies are referred to in this planning brief (as in the Blackfriars planning brief).</p> <p>3. The proposals to identify and interpret the line of the Roman defences is supported. The aspiration to redevelop along the frontage of Brunswick Road may however conflict with this, and itself may be difficult to achieve without damage to the Roman defences preserved below ground.</p> <p>Part 4 does not identify archaeology as a consideration in the design of new development. If archaeological and development needs are to be reconciled it will be essential that the design process is informed by detailed knowledge of the archaeological remains on the site and the policy requirements for preservation and mitigation of impact.</p>	<p>2. Agree. Amend text accordingly.</p> <p>3. Comment and support noted. A full archaeological strategy will be sought in support of any application and this requirement is made clear in the text of the revised planning brief.</p> <p>Agree in part. Although archaeology is referred to in Part 4 further clarification could be provided. Amend text to state that 'appropriate consideration must be given to the potential for the presence of nationally significant elements of the historic environment'.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1449 Gloucestershire County Council	Comment	Parking Standards	Paragraph 4.13 Pleased to see reference to Regional Parking Standards, however the emerging Regional Spatial Strategy does not contain parking standards and it would therefore be better to refer to the Local Transport Plan standards, as adopted in Gloucester's Development Control Policies LDD (Preferred Options Consultation Paper) at Appendix 2.	Agree. Amend text to refer to the parking standards set out in the Second Gloucestershire Local Transport Plan 2006 – 2011.
1450 Gloucestershire County Council	Comment	Planning Obligations	Various comments are made throughout the Central Area Action Plan and the Site Allocations & Designations (Non-Central Area) papers about infrastructure, which generally is supported. However, there are various threads and the drafting is not specific. A single commentary should refer to the extended range of services provided by the County Council - e.g. page 23 para 4.56 "Greater Greyfriars Planning Brief" is supported but requires extension or clarification. This representation is applicable to all development areas to ensure appropriate infrastructure of all types is secured in conjunction with the County Council.	Disagree - The City Council promotes a development team approach whereby all parties to planning obligations resulting from a development agree, pre-application, the paramount obligations to be pursued from any development. This should ensure a more equitable distribution of resources between highways, education, affordable housing, community services, sustainable transport and public open space.  Furthermore, the recent establishment of a S106 Project Group, involving city and county officers, will further ensure a co-ordinated approach to S106 contributions.

Name/Ref No.	Support/Object/ Comment	Policy/Section	Comment	Response
1450  Gloucestershire County Council (cont.)	Comment	Planning Obligations	Add additional comment to all supplementary planning documents under planning obligations heading:- "Education, Community, Fire and Rescue, Transportation" Developers are advised to contact Gloucestershire County Council as early as possible for advice and discussion on the following matters for which that Council is responsible. Infrastructure requirements will vary for each site and will be required by way of negotiation in relation to the impact of that individual proposal. The extent of infrastructure depends on the nature of the development but may include contributions in the form of finance, land or works towards education (at children's centre, primary and secondary levels), community functions (Libraries, services for Youth, Elderly and Disabled), Transportation and Highways (in conjunction with Gloucester City Council) and Fire and Rescue."	See response above.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1471 A I Atkins	Comment	Greater Greyfriars Planning Brief	<p>Support with reservations.</p> <p>In the main, this is a good scheme. It goes some way to meet the pressing need for City Centre housing, which should be given more priority over commercial development.</p> <p>As to the 'Cultural Centre', we have two theatres, two cinemas, two museums, several clinics, a leisure centre, school halls, church halls, a tennis centre and so on. Can we justify the use of valuable land and millions of pounds on duplicating existing facilities - many of which are widely underused.</p> <p>More housing!</p>	<p>Comments noted.</p> <p>The proposed Neighbourhood Resource Centre (NRC) will provide a multi-functional space that can be utilised for a number of different uses including a GP surgery. The provision of such a facility in the City Centre is considered to be an important objective – helping to balance the physical and social regeneration of the area and providing for identified needs.</p> <p>The provision of new housing on the existing Gloscat sites will help the City Council meet the housing requirement set out in the draft Regional Spatial Strategy for the South West.</p>

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1700 Gloucester Quaker Meeting	Comment	Quaker Meeting House	The meeting house and lodge have vehicle access via Greyfriars.	<p>Comment noted. The Planning Brief details that consideration should be given to the pedestrianisation of Greyfriars and this would require detailed investigation and full public consultation through the Traffic Regulation Order procedures. Alternative means of access will be provided through the development site to Priory Place.</p> <p>No change made.</p>
1700 Gloucester Quaker Meeting	Support	Conservation Area	We support the designation of the whole of the Greater Greyfriars area as a conservation area with it's Conservation Area Consent.	Support noted.
1700 Gloucester Quaker Meeting	Support	Noise Mitigatory Measures	The meeting house is valued for its quiet atmosphere and all noise mitigatory measures are supported.	Support noted.
1700 Gloucester Quaker Meeting	Comment	Retail and Leisure	We support a mix of housing, but feel that retail and leisure sites need careful consideration regarding positioning both for the quality of life for residents and ourselves.	Comment noted. The potential noise impact of any commercial uses will be considered as part of the development management process. No change.

Name/Ref No.	Support/Object/Comment	Policy/Section	Comment	Response
1700 Gloucester Quaker Meeting	Support	Open Space	We welcome the development of a high quality space around Greyfriars monument.	Support noted.
1700 Gloucester Quaker Meeting	Comment	Car Parking	We are concerned that there should be sufficient public car parking in the vicinity for users of our building.	The Greater Greyfriars site is located within the heart of Gloucester within very close proximity to a number of public car parks.  No change made.
1700 Gloucester Quaker Meeting	Comment	Amenity of Quaker Meeting House	The Quakers meeting house is a quiet contemplative building used by a variety of diverse groups who value this in a City Centre location. We are concerned that this amenity is recognised and respected.	Comment noted. The proposals set out in the planning brief will have no direct impact on the Quakers meeting house. Any noise impact will be properly considered through the development management process. No change.
Officer Comment	Comment	Affordable Housing	On-going discussions around this issue suggests that 30% affordable housing should be viable and achievable on site.	Amend paragraph 4.58 to refer to the likelihood of 30% affordable housing on the site.
Officer Comment	Comment	Introduction and Next Steps	Should be updated to reflect the current status of the brief and the proposed next steps towards adoption.	Agree. Amend text accordingly.

<b>Name/Ref No.</b>	<b>Support/Object/Comment</b>	<b>Policy/Section</b>	<b>Comment</b>	<b>Response</b>
Officer Comment	Comment	Conservation Areas	The boundaries and text should be amended to refer to the changes made in the recent Conservation Area appraisals.	Agree. Insert new plan and amend text accordingly.
Officer Comment	Comment	GHURC	Updated reference should be made to the GHURC regeneration framework.	Agree. Insert reference to GHURC Regeneration Framework.
Officer Comment	Comment	Housing Mix	Housing mix should be referred to in the context of the Government's sustainable communities agenda.	Agree. Amend text accordingly.
Officer Comment	Comment	Eco-Homes	Reference should be made to the replacement to Eco-Homes, the Code for Sustainable Homes.	Agree. Insert reference to Code for Sustainable Homes and requirement for development to achieve Level 3.
Officer Comment	Comment	Climate Change	Reference should be made to climate adaptation in light of predicted climate change.	Agree. Insert new section on climate adaptation.
Officer Comment	Comment	Waste minimization	Reference should be made to the issue of waste minimization and the County Council's Waste minimization SPD.	Agree. Amend text accordingly.

<b>Name/Ref No.</b>	<b>Support/Object/Comment</b>	<b>Policy/Section</b>	<b>Comment</b>	<b>Response</b>
Officer Comment	Comment	Renewable Energy	Update text to reflect current policy approach.	Agree. Amend text accordingly.
Officer Comment	Comment	GHURC	The document should be updated to refer to the fact that Edward Ware Homes have been appointed by English Partnerships as their preferred development partner for the GLOSCAT sites.	Agree. Amend text accordingly.
Officer Comment	Comment	Community Strategy	Update reference to Community Strategy.	Agree. Amend text accordingly.
Officer Comment	Comment	Historic Environment	Reference should be inserted in the planning policy section to PPG15 and PPG16.	Agree. Amend text accordingly.
Officer Comment	Comment	Scheduled Monuments	Scheduled Ancient Monuments (SAMs) are no longer called Scheduled Ancient Monuments, they are just Scheduled Monuments.	Agree. Delete reference to Scheduled Ancient Monuments and replace with reference to Scheduled Monuments throughout the document.