

**Revised Draft Greater Blackfriars
Planning Brief
Supplementary Planning
Document**

Consultation October-November 2007

Schedule of Comments



Explanatory Note

The following schedule details every representation that was made to Gloucester City Council's Revised Draft Greater Blackfriars Planning Brief (SPD) formal consultation, under Regulation 17 of the Town and Country Planning (Local Development) (England) Regulations 2004. The Consultation was held for six weeks between 1 October and 12 November 2007.

The schedule does not detail officer comments to these representations.

A number of other documents were consulted on alongside the Revised Draft Greater Blackfriars Planning Brief, and separate schedules have been drawn up accordingly. These are as follows:

- Revised Draft Greater Greyfriars Planning Brief (Supplementary Planning Document)
- Revised Draft Kings Square and the Bus Station Planning Brief (Supplementary Planning Document)
- Revised Draft Railway Corridor Planning Brief (Supplementary Planning Document)
- Revised Draft Westgate Island and Quay Planning Brief (Supplementary Planning Document)
- Revised Draft Clearwater Drive Planning Brief (Supplementary Planning Document)
- Revised Draft Land East of Waterwells Business Park Planning Brief (Supplementary Planning Document)

- Revised Draft Designing Safer Places (Supplementary Planning Document)
- Revised Draft Telecommunications Development (Supplementary Planning Document)
- Revised Draft Home Extension Guide (Supplementary Planning Document)
- Revised Draft Development Affecting Sites of the Historic Environment (Supplementary Planning Document)
- Draft Lifetime Homes (Supplementary Planning Document)

Name/ Reference Number	Support/ Object/ Comment	Policy/Section	Comment/Representation
0337 Gloucestershire Constabulary County Police HQ	SUPP	The Brief and location of police station	<p>Gloucestershire Constabulary fully supports the initiative to regenerate the Greater Greyfriars area, including the provision of a replacement police station for Gloucester City.</p> <p>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>
1146 Highways Agency	COMM	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 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>
1444 Gloucestershire County Council	COMM	Cycle Parking Standards	Paragraph 4.17. Traffic and Transport. Cycle parking standards should be expressed as a 'minimum' not a 'maximum'.
0091	COMM	Paragraph 4.12	Paragraph 4.12. Please strengthen this paragraph to require the developer to improve the

Mr J Rhodes			<p>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>
0231 The Gloucester Quays Partnership	SUPP	The Brief	Support approach taken in document. It is consistent with the emerging Core Strategy DPD as well as pertinent national planning guidance.
01828 English Heritage	COMM	Contextual Analysis	<p>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.</p> <p>Suggest partnership working with GHURC to realise potential.</p>
0181 South West Regional Assembly	COMM	Conformity with RPG10 and Draft RSS	<p>Conform 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 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	COMM	Paragraph 2.34	<p>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 administrative scheduling processes than the form of the roman city.</p>
01771 Mr Nigel Spry	COMM	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>

01771 Mr Nigel Spry	COMM	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.
1397 South West Of England Regional Development Agency	OBJ	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.
1397 South West Of England Regional Development Agency	OBJ	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.
1397 South West Of England Regional Development Agency	OBJ	Paragraph 4.4	Paragraph 4.4. Greater flexibility required in relation to the particular uses for specific sites.
1397 South West Of England Regional Development Agency	OBJ	Paragraph 4.6	Paragraph 4.6. Rephrase to reflect that the 'cultural quarter' concept is still being tested.

1397 South West Of England Regional Development Agency	COMM	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.
1397 South West Of England Regional Development Agency	COMM	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.
1397 South West Of England Regional Development Agency	COMM	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.
1397 South West Of England Regional Development Agency	COMM	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.
1397 South West Of England Regional Development Agency	COMM	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.

1369 National Offender Management Service	COMM	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.
0231 The Gloucester Quays Partnership	SUPP	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>
0445 Environment Agency	COMM	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.
0445 Environment Agency	COMM	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 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.

If you have problems understanding
this in English please contact:

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GL1 2EQ. Tel: 01452 396909.

Bengali

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Chinese

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Gujarati

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Urdu

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