

**Draft Heights of Buildings
Supplementary Planning Document**

**Consultation October – December
2007/January 2008**

Schedule of Comments



Name/ Reference Number	Support/ Object/ Comment	Policy/Section	Comment/Representation	Officer Response
0087 Mr Geraint Jones	Comment	Tall Buildings SPD	Consider it would be difficult to develop new tall buildings without them being obtrusive and adding to the already damaged views of the city. Building heights should be restricted to the existing 75' and spread.	<p>Comment noted. The revised SPD adopts a balanced approach whereby there is scope for tall buildings in appropriate locations but the height of existing buildings within designated areas will be carefully controlled.</p> <p>The document will therefore help to ensure that tall buildings are not provided in inappropriate locations where they would have a negative impact.</p>
0183 Pat Roberts	Support	Tall Buildings SPD	Support combination of options 3 and 4	Support noted. The combination of Options 3 and 4 has been taken forward into the revised SPD.

Name/ Reference Number	Support/ Object/ Comment	Policy/Section	Comment/Representation	Officer Response
0231 Gloucester Quays LLP	Support	Tall Buildings SPD	<p>General support for a tall buildings policy. However it is considered that none of the options set out in the document provides a suitable base for consideration of exemplar buildings that make a positive contribution to the skyline.</p> <p>Recommend that any future SPD be based on the criteria contained within guidance recently prepared by English Heritage and CABA for evaluating tall buildings:</p> <ul style="list-style-type: none"> • Relationship to context • Effect on historic environment • Relationship to transport infrastructure • Architectural quality of the building • Sustainable design and construction • Credibility of design • Contribution to public space and facilities • Effect on the local environment • Contribution to permeability; and • Provision of a well designed environment 	<p>Support noted. The consideration of an exemplar building will be subject to the same tests as other tall buildings and their contribution to Gloucester's skyline will be taken into account.</p> <p>Noted. The revised SPD reflects the CABA advice on tall buildings. Criteria which are targeted to Gloucester are proposed, which build on existing Local Plan policies.</p>

			<p>Rather than imposing unnecessarily restrictive blanket constraints on building heights in areas of the city, recommend a more positive approach that incorporates elements of the options proposed. A simple but robust policy requiring tall buildings to be appropriately located, of excellent design and enhances both the immediate and wider location and setting, including the city skyline. The policy should identify important features that should be maintained and enhanced by any future development.</p>	<p>Comment noted. It is the intention of the revised SPD to take into account issues at both the local and strategic levels and pay due regard to the more sensitive areas of the city. The policy is being developed to be as focussed as possible, while at the same time being robust enough to cover wider issues relating to design.</p>
<p>1353 Morley Fund Management</p>	<p>Comment</p>	<p>Government Guidance</p>	<p>Concern that the overall emphasis of the SPD on tall buildings is rather negative. The thrust of Government guidance, reflected in the EIP Panel Report for the RSS, is for the delivery of an enhanced quantum of residential development at higher densities. The opportunities to provide this by means of tall buildings should be set out at the beginning of the key issues chapter of the draft SPD.</p>	<p>Comment noted. The issue of higher density residential development is a key consideration but this will inevitably be balanced by the need to consider the existing character of Gloucester. It should also be noted that it is possible to achieve high-density development at lower heights, with more efficient ground coverage.</p>

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<p>1353</p> <p>Morley Fund Management</p>	<p>Comment</p>	<p>Definition</p>	<p>There is scope within the draft SPD to provide additional clarification on the characteristics of a tall building to which the document will relate.</p> <p>CABE 'Guidance on Tall Buildings' (July 2007) advises at paragraph 4.1 that the criteria for the evaluation of tall buildings is relevant to buildings that are substantially taller than their neighbours and/or which significantly change the skyline.</p> <p>In the case of Gloucester where the prevailing building heights are 3 - 4 storeys, a proposal for 5 - 6 storeys should not be considered tall, whereas ten storeys should.</p>	<p>Comment noted. The revised SPD defines these characteristics.</p> <p>There are many factors which will be taken into account when responding to development proposals for a tall building. One of these will be the height of the proposal and its impact on the character of the surrounding area. A proposal will be required to respond to the existing Conservation Area Appraisal documents and the special character of the 13 conservation areas within Gloucester.</p>

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1353 Morley Fund Management	Object	Policy Options	<p>Consider that options 2, 3, 4 and 5 do not provide a balanced policy basis in that context forms are the only determining factor. CABE 'Guidance on Tall Buildings' (July 2007) advises that proposals for tall buildings should be considered as pieces of architecture is their own right, and as pieces of urban design sitting in a wider context; in this respect they should be assessed in the same way as any other project.</p> <p>The proposed options would provide an overly restrictive policy basis. Proposals for taller buildings would be refused permission before the full planning merits of the proposal are given due consideration, and no policy guidance is offered on proposals for tall buildings outside the defined areas. It would also result in proposals not responding to the full opportunities presented by development sites (PPS1, para 34).</p>	<p>Objection noted. The combination of Options 3 and 4 is considered to provide suitable flexibility.</p> <p>A full consideration of all the planning and design merits of each development proposal will be made. The Heights of Buildings policy will compliment existing planning policies, such as those relating to the protection and enhancement of conservation areas, while also proving a clear direction to developers. This will enable more appropriate and better-considered schemes to emerge.</p>

<p>1353</p> <p>Morley Fund Management</p>	<p>Support</p>	<p>Proposed Policy Approach</p>	<p>Support a combination of options 1 and elements of option 4. Option 1 (do nothing) is a viable option and would provide a reasonably sound basis for the consideration of proposals for tall buildings and encourage innovative and landmark schemes to be delivered. Generic development control policies relating to good design that emphasise the importance of local context should guide developers and provide the policy basis for determining planning applications. CABE guidance relating to tall buildings states that proposals for tall buildings should be assessed in the same way as any other project.</p> <p>Acknowledge the historic heritage of Gloucester and the significance of the Cathedral as a visual marker. Therefore welcome strategic views option, and agree that the seven strategic views identified are appropriate and worthy of protection.</p> <p>However we do not believe that the identified local views are justified and that they are factually incorrect – therefore they should be omitted from the policy.</p>	<p>Agree in part. Option 1 is considered an inappropriate approach within Gloucester as there are a number of modern tall buildings which have had a detrimental effect on the image of the city. Increased interest in higher density development and rising land values make tall buildings within urban areas a key issue. Guidance, which sets out the considerations relating to the development of tall buildings in Gloucester, will help clarify matters. Strategic and local views are an important part of the process when considering the development of a tall building.</p> <p>Disagree. Local views of the cathedral and other historic structures are essential to reinforce the positive historic image of Gloucester. The views are factually correct and there are photographs from each</p>
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				location. No change.
1353 Morley Fund Management	Object	Option 4; Local Views	<p>The identified local views are unjustified and factually incorrect. Concerned that they seek to protect every direct view available to the cathedral regardless of whether it enhances the character of the immediate/wider area and regardless of the location and function of the viewing point within the hierarchy of the urban spaces and circulation network – especially at pedestrian level.</p> <p>Relevant viewing locations must comprise urban spaces where people are likely to congregate and along routes that are important in the urban pedestrian circulation. The selection of views should be based on a thorough analysis – suggested criteria provided with representations.</p> <p>Consider a complete view of the cathedral is not a pre-requisite for a viewing corridor to be considered important. A series of unfolding views and experiences where unseen views are presented in turn can provide a more rewarding experience.</p>	<p>Disagree. Local views of the cathedral and other historic structures are essential to reinforce the positive historic image of Gloucester. The views are factually correct and there are photographs from each location. Views at the pedestrian level are key to enhancing the experience of the city, especially within the city centre.</p> <p>Agree. This is the basis upon which the local views were presented. An analysis of each view, along with the heritage significance is presented in the revised SPD.</p> <p>Agree in part. As an example, see view 22, from the junction of Spa Road and Southgate Street. It is considered that although there is only a partial view of the cathedral tower, it is still important to retain. Many of the views identified present only</p>

			<p>Moreover, an existing view of the cathedral could be enhanced by improving the form of development in the foreground, whilst resulting in less of the Cathedral being viewed directly.</p>	<p>partial views of the cathedral, but the introduction of a competing tall building would detract from these views.</p> <p>Noted. If the form of development in the foreground is improved, this will be taken into consideration and balanced with the potential loss of a view to the cathedral.</p>
<p>1353</p> <p>Morley Fund Management</p>	Object	Wider considerations	<p>The draft SPD should give due consideration to the need to create a vibrant and vital city centre. The unjustified protection of immediate local views of the cathedral without consideration of constraints could adversely affect the viability of proposed regeneration schemes.</p>	<p>Creating vibrancy or vitality within the city is important, as is the protection and enhancement of the character of Gloucester. The revised SPD is considered to strike an appropriate balance between the protection of key views and the need for new development. Local constraints have been taken into account while considering the local and strategic views.</p>

Name/ Reference Number	Support/ Object/ Comment	Policy/Section	Comment/Representation	Officer Response
1397 South West of England Regional Development Agency	Support	Tall Buildings SPD	<p>Support SPD.</p> <p>Consider that a planning framework for tall buildings should allow for a degree of flexibility in future development of key sites. Option 5 is considered too restrictive, as properly sites and designed taller buildings could enhance the city's historic character as well as developing more sustainable communities.</p> <p>Support an approach in line with option 3 (area based approach) or 4 (view corridor based approach) that would both allow for flexibility in design within clear parameters.</p>	<p>Agree. It is considered that a combination of options 3 and 4 gives the desired flexibility while protecting the existing character of certain areas. These options have been taken forward into the revised SPD.</p>
1400 LXB Property Partners	Support	Tall Buildings SPD	<p>Support Option 4, as this will safeguard specific view corridors, including local views and wider strategic views.</p> <p>Consider the view corridors identified in Appendices 3 and 4 cover the most important view corridors in Gloucester.</p>	<p>Support noted. A combination of Options 3 and 4 have been taken forward into the revised SPD.</p>

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1444 Gloucestershire County Council – Environment Directorate	Comment	Option 4 – Paragraph 4.23 – 4.28	The text and plans at Appendices 3 and 4 do not show or account for the key views of the city that are now highly evident, arising from the creation of the new Gloucester south-west bypass in the sector from Cole Avenue/Bristol Road junction to Hempsted Bridge. If the view corridor approach is adopted, the impact of tall buildings should be considered from this road as well as the other highlighted in the text.	Agree. New views into Gloucester from the south-west bypass have been identified within the revised SPD.
1446 Gloucestershire County Council – Ecology	Comment	Tall Buildings SPD	It is recommended that any proposal for a new tall building should pay particular attention to (a) making the structure unattractive to gulls and (b) providing a green or brown roof for the benefit of biodiversity, energy conservation and reducing rainfall runoff.	Agree. These issues have been identified in the revised draft SPD.
1515 Mr Leonard Carey	Support	Tall Buildings SPD	Support option 4, with a recommendation that the view from the west is maintained or improved as a priority.	Support noted. A combination of Options 3 and 4 have been taken forward into the revised SPD.

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1534 Mr Martyn Williams	Comment	Tall Buildings SPD	Consider that the height of a tall building should not matter as long as it is pleasing to the eye.	Comment noted. However, tall buildings if inappropriately located can harm important views regardless of how well-designed they are. As such, it is important that their siting is controlled. The design of any tall building will also be taken into account and this is reflected in the text of the revised SPD.
01771 Mr Nigel Spry	Support	Tall Buildings SPD	Support combination of options 3 and 4, stressing the need to safeguard the historic building evidence of Gloucester.	Support noted. The revised SPD takes forward a combination of Options 3 and 4.
01800 Gloucester Civic Trust	Support	Tall Buildings	Support a combination of options 3 and 4 as it provides the most appropriate and flexible approach.	Support noted. The revised SPD takes forward a combination of Options 3 and 4.

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01800 Gloucester Civic Trust	Object	Tall Buildings	The document contains no mention of a policy to remove poor quality non-conforming buildings. It is important that the document contains positive proposals for the removal of such buildings.	Agree. Reference to the removal of buildings has been included in the revised SPD.
01851 Jon Close	Support	Tall Buildings SPD	Support option 5 – prohibitive approach to tall buildings. Gloucester should be regenerated sympathetically to its surroundings.	Support noted. The regeneration of Gloucester has to take into account the historic character of much of the city centre and be sympathetic to the existing character of the city. There may be sites, however, which are suitable for the development of a tall building and the combination of Options 3 and 4 is considered to strike an appropriate balance between the protection of key views and the need for development.

Name/ Reference Number	Support/ Object/ Comment	Policy/Section	Comment/Representation	Officer Response
01852 Mr Ian Hatton	Support	Tall Buildings SPD	Support option 4, with a height restriction as shown in clause 4.30. Any building over 4-storeys high should be aesthetically pleasing. Suggest a typical building height limit in accordance with the existing Land Registry building.	Support noted. A combination of Options 3 and 4 has been taken forward into the revised SPD.
01853 Christine Beazer	Support	Tall Buildings SPD	Support a combination of options 3 and 4. The area-based approach is essential in order to conserve the historic buildings and layout of Gloucester, and the view corridor approach will enhance the whole plan. Careful consideration should be given to taller buildings and first class contemporary architecture will be required.	Support noted. Agree that a combination of options 3 and 4 would provide the most appropriate development framework and this is reflected in the revised SPD.

Name/ Reference Number	Support/ Object/ Comment	Policy/Section	Comment/Representation	Officer Response
01854 Mr Richard Graham	Support	Tall buildings SPD	Support adoption of options 3 and 4. However the concept of tall buildings should not be ruled out elsewhere in the city.	Support noted. A combination of Options 3 and 4 has been taken forward into the revised SPD. The concept of tall buildings will not be ruled out in parts of the city which are not historically sensitive and which do not block key views of the cathedral and other historic structures.
01855 Daphne Johnson	Support	Tall Buildings SPD	Support combination of options 3 and 4. Ideally, new view corridors would be considered on an annual basis.	Support noted. A combination of Options 3 and 4 has been taken forward into the revised SPD. Agree that it may be appropriate to review the view corridors on an on-going basis.

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this in English please contact:

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Bengali

ইংরেজী ভাষায় এটা বুঝতে আপনার সমস্যা হলে, দয়া করে নিচের
ঠিকানায় যোগাযোগ করুন:
ট্যাপেস্ট্রী ট্রান্সলেশন সার্ভিস
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হারবার্ট ওয়্যারহাউস, দা ডকস
গ্রান্ডার ডিএল ১ ২ইকিউ
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Chinese

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Gujarati

તમોને જો આ ઈંગ્લીશમાં સમજવામાં તકલીફ પડતી હોય તો મદદરોની
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કોર્પોરેટ પર્સનલ સર્વિસીસ,
હરબર્ટ વેરહાઉસ, ધ ડોક્સ,
ગ્રાન્ડર ડીએલ ૧ ૨ઈકીયુ.
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Urdu

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