

Core Strategy Issues and Options Paper (2)
Schedule of Comments by Policy

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Officer Response
21.1 Government Office of the South West	Core Strategy	Object	There appears to be no feel for what the LDF is going to do for Gloucester in particular. Many of the policies and objectives of this document would be transferable to other Cities as they are not specific or 'local' in their wording. The strategy fails to convey the 'spatial thinking' that the new planning system is all about.		Agree that the document needs to be made more 'Gloucester specific'. Insert additional text as appropriate.
21.2 Government Office of the South West	Core Strategy	Object	There is some repetition of National Policy in the early stages, which should be avoided.		Disagree. The brief summary of national, regional and local policy is required in order to place the remainder of the document in context.

<p>21.6</p> <p>Government Office of the South West</p>	<p>Core Strategy</p>	<p>Object</p>	<p>Could refer to the Neighbourhood Management Pathfinder Project in the Core Strategy – is there a need or scope for the City Council to engage with the work and work together to achieve goals for the wider community.</p>		<p>Agree that reference could usefully be made to the Gloucester Neighbourhood Management Pathfinder Project 'Community Counts'. Amend text accordingly.</p>
<p>24.1</p> <p>Countryside Agency (Landscape, Recreation, and Access Division)</p>	<p>Core Strategy</p>	<p>Object</p>	<p>For understandable reasons the Core Strategy focuses on the consequences of development within the City limits, but the increase in urban density will have important implications in terms of providing adequate recreational facilities and access to countryside. Close liaison will be needed between Gloucester and its neighbouring authorities to deliver an integrated countryside access and recreation strategy.</p>		<p>Agree that further reference should be added to joint-working with neighbouring local authorities. Amend text accordingly.</p>

<p>24.2</p> <p>Countryside Agency (Landscape, Recreation, and Access Division)</p>	<p>Core Strategy</p>	<p>Comment</p>	<p>The Countryside Agency (Landscape, Recreation, and Access Division) have compiled a checklist based on the revision of six planning principles contained in 'Planning Tomorrows Countryside' as updated by CA LAR in June 2005. Its aim is to highlight specific interests and concerns in the early stages of the development of the LDF to assist local planning authorities to incorporate sustainable countryside planning principles into their plans and polices. This covers both the Core Strategy Issues and Options Policy Document and the Development Control Policies Issues and Options Policy Document.</p> <p>The majority of the criteria provided are awarded 'well considered'. There are four criteria however that are only considered 'partially considered'. These are:</p> <ul style="list-style-type: none"> •1 1C – Will the plan proposals respect the ability of the environment to accommodate change (including climate change) 		<p>Comment noted.</p>
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			<ul style="list-style-type: none">•2 3A – Does the document identify landscape character areas?•3 4A – Are the implications of urban intensification, new urban extensions, or stand-alone new settlements fully explored in terms of effects and demands on the countryside? (Intensification of development within Gloucester City will have ramifications for the surrounding countryside)•4 6C – Are specific proposals for rights of way improvement and open space provision clearly set out? (This needs further amplification). <p>Two criteria are considered 'not considered'. These are:</p> <ul style="list-style-type: none">•1 6A – Are the countryside recreational and leisure needs of communities properly addressed? (Leisure within the City is covered but not elsewhere)•2 6B – Are proposals for diversity and all-inclusive use of the countryside set out?		
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<p>25.1</p> <p>White Young Green Planning representing Peel Developments (UK) Limited</p>	<p>Core Strategy</p>	<p>Support</p>	<p>Express support as for the underlying aims of the Strategic Objectives set out in the Core Strategy and the particular focus on central area regeneration advocated in the proposed Spatial Strategy. The essential thrust of the objectives and strategies proposed in the above documents are generally consistent with higher-level policy at national and strategic levels. It will be important that the details of the Preferred Options selected for policies in both documents, when they are drafted, are similarly soundly based.</p>		<p>Support noted.</p>
<p>30.1</p> <p>The Gypsy and Traveller Law Reform Coalition</p>	<p>Core Strategy</p>	<p>Comment</p>	<p>The Gypsy and Traveller Law Reform Coalition highlighted regarding gypsy and traveller accommodation needs with regard to the new planning system.</p>		<p>Comment noted.</p>

Background					
<p>14.2</p> <p>South West Regional Assembly</p>	<p>Background - Paragraph 2.9</p>	<p>Object</p>	<p>Both the Council and the LDF need to be outward looking in terms of recognising the City within the spatial planning context and taking into account cross boundary issues. As a place, Gloucester is more than 'the City'. The Council should continue to work with neighbouring local authorities to ensure that better planning and delivery is achieved for Gloucester as a whole and not just those residents that living within the administrative boundary. It would beneficial to draw this out as part of the Background, Spatial Vision, or Spatial Strategy.</p>		<p>It is acknowledged that greater reference should be made to the role of Gloucester as a Principal Urban Area including the need for cross-boundary working.</p>

Policy Context					
14.1 South West Regional Assembly	Policy Context	Object	Whilst thorough, the section could be reduced in length or better summarised, rather than repeat national and other guidance.		Agree that the Policy Context section of the document could be made shorter in order to avoid repetition of national policy.
14.3 South West Regional Assembly	Policy Context - Paragraph 3.2 – (first sentence)	Object		It would be better to use the words ‘determined through the Regional Spatial Strategy’ as is the case in Paragraph 4.11, than ‘dictated by the Regional Spatial Strategy’.	This sentence has been deleted.
14.4 South West Regional Assembly	Policy Context - Paragraph 3.2 (second sentence)	Object		‘One of the roles’ could be inserted at the start of the sentence.	This sentence has been deleted.

14.5 South West Regional Assembly	Policy Context - Paragraphs 3.15 – 3.20	Support	This section provides useful context for the Core Strategy. Update of the RSS process provided.		Support noted. Amend text to insert reference to Regional Spatial Strategy.
14.6 South West Regional Assembly	Policy Context - Paragraphs 3.20	Object		The fourth IRS bullet point should aim to read 'To address deprivation and disadvantage to reduce significant intra -regional inequalities'.	Agree. Amend text.
14.7 South West Regional Assembly	Policy Context - Paragraphs 3.27 – 3.30	Object		This section should be updated to reflect the County Council's decision not to progress the Structure Plan in light of the Secretary of States Direction, although it is not to be abandoned.	Agree. Amend text accordingly.

1.1 Robert Hitchins Limited	Policy Context - Paragraph 3.27	Object		This should reflect the current situation with regard to the Gloucestershire Structure Plan Third Alteration.	Agree. Amend text accordingly.
1.2 Robert Hitchins Limited	Policy Context - Paragraph 3.18 (Bullet Point 1)	Object		This should state the identification of Gloucester 'and its immediate surrounding area' as one of the two Principle Urban Areas (PUA's).	Agree. Amend text.
1.3 Robert Hitchins Limited	Policy Context - Paragraph 3.18 (Bullet Point 2)	Object		This should state, Gloucester 'along with Cheltenham PUA' to be the focus of growth in Gloucestershire.	Agree. Amend text.

<p>17.1</p> <p>Tweedale Limited representing I.M. Group Limited</p>	<p>Policy Context – Regional Policy</p>	<p>Object</p>	<p>The section outlining the policy background both current and emerging in the preparation of the LDF is supported.</p> <p>However it is suggested that, given the prominence that the Regional Spatial Strategy (RSS) will play in the development and operation of the LDF paragraphs 3.16 to 3.18 will need to be reviewed when the RSS is published later this year.</p>	<p>The timescale of the LDF should be amended where necessary, to take account of the longer operational timescale of the RSS.</p>	<p>Agree that reference should be made to the emerging Regional Spatial Strategy for the South West.</p> <p>Amend text accordingly.</p>
<p>17.2</p> <p>Tweedale Limited representing I.M. Group Limited</p>	<p>Policy Context – Local Policy – Paragraph 3.27.</p>	<p>Object</p>	<p>Paragraph 3.27 indicates that the Structure Plan Third Alteration should be adopted during 2005 but it is currently understood that this will not now progress. As such, the role that the forthcoming RSS will play in the development of the LDF will be much greater.</p>	<p>The section on the Gloucestershire Structure Plan should be redrafted to properly reflect the respective weight in the roles of the Structure Plan and RSS in the LDF.</p>	<p>Agree that the document should be updated to reflect the latest situation concerning the Gloucestershire Structure Plan Third Alteration and its replacement with the Regional Spatial Strategy for the South West.</p>

17.3 Tweedale Limited representing I.M. Group Limited	Policy Context – Local Policy – Paragraph 3.28.	Object		The LDF should acknowledge that it will be the RSS and not the Gloucestershire Structure Plan which will set the level of proposed housing within the City for the current plan period and beyond.	Agree that reference should be made to the role of the Regional Spatial Strategy in determining future housing growth in the Gloucester PUA.
17.4 Tweedale Limited representing I.M. Group Limited	Policy Context – Local Policy – Paragraphs 3.26. 3.34, and 3.35.	Support	Support inclusion of much of the content of the local plan as it was compiled from, in most instances, the most up-to-date planning policy available which remains relevant to date and has been subject to substantial public consultation.		Support noted.
20.1 Environment Directorate – Gloucestershire County Council	Policy Context - Paragraph 2.23	Object	Under local policy, there is currently no mention of the Gloucestershire Local Transport Plan.		Agree. Insert reference to the Gloucestershire Local Transport Plan.

<p>20.2</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Policy Context - Paragraph 2.27</p>	<p>Object</p>	<p>The average build rate as stated in the Gloucestershire Housing Monitor 2004 is higher for the 1997 – 2002 period (438 dwellings per annum). In addition the most recent completion statistics for 2003/04 (768 dwellings) has increased the annual average for the period 1997 – 2003/04 to 485 dwellings. The most up-to-date housing land information should be used - most likely incorporating the period up to 01/04/2005.</p>		<p>Agree that up to date housing completion figures should be included. Amend text accordingly.</p>
<p>20.3</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Policy Context - Paragraphs 2.25 – 2.28</p>	<p>Object</p>		<p>The fact that the Structure Plan is subject to a SoS Direction should be mentioned (although it is noted that it is referred to later in the document regarding housing numbers). The outcome of the Structure Plan item at the 15 June 2005 County Council meeting should be noted. The Structure Plan Second Review still remains the most recently adopted Structure Plan for the County.</p>	<p>Agree that reference should be made to the latest situation concerning the Gloucestershire Structure Plan Third Alteration.</p> <p>Amend text accordingly.</p>

Key Issues						
1.4 Robert Hitchins Limited	Key Issues - Key Issue 1	Object			This point should refer to the fact that the Gloucester PUA includes the City and its immediate surrounding areas.	Agree that a clear definition of the Gloucester PUA should be incorporated into the document. Amend text accordingly.
1.12 Robert Hitchins Limited	Section 4 – Key Issues	Object	Currently unclear as to whether the figures and information quoted is for the Gloucester City area or the Gloucester PUA.			The information provided in Section 4 relates to Gloucester City, not the Gloucester PUA. No change.
5.1 Highways Agency	Key Issues – Key Issue 8	Support	Support the rewording of Key Issue 8 from: 'Car use and ownership in Gloucester is lower than average' to: 'Although car ownership in Gloucester is lower than average,			Support noted.

			high levels of in-commuting and frequent use by those that do own a car, lead to congestion, particularly at peak times'.		
7.1 The Barton Willmore Planning Partnership representing Kayterm Plc	Key Issues – Issue 1	Support	Agree with the revised draft Key Issue 1 as comments regarding clarification that 'growth' includes both employment and housing have been taken on board.		Support noted.
7.2 The Barton Willmore Planning Partnership representing Kayterm Plc	Key Issues – Issue 3	Object		Whilst agreeing with this statement consider that it might be useful if the implications can be drawn out. The identified constraints on development of the City mean that there is a need for 'creative approaches' in future proposals so that sustainable growth can continue to take place.	Agree that reference should be made to the need for sustainable growth.

<p>7.3</p> <p>The Barton Willmore Planning Partnership representing Kayterm Plc</p>	<p>Key Issues – Issue 12</p>	<p>Object</p>	<p>Notable lack of reference to housing in the Key Issues. Concerned that it is not simply a quantitative increase in affordable accommodation that is needed – it is necessary to consider qualitative issues also.</p>	<p>Propose that an additional Key Issue is added:</p> <p>‘Housing will be delivered to cater for a range of needs and aspirations, including a wide choice and mix of dwellings, in order to promote the establishment of sustainable communities’.</p>	<p>Agree in part. Insert suggested wording as a strategic objective not a key issue. Amend text accordingly.</p>
<p>9.1</p> <p>Gerald Eve representing British Energy Plc</p>	<p>Key Issues - Paragraph 4.47</p>	<p>Support</p>	<p>Support the expectation that Gloucester will need to accommodate the majority of the County’s housing growth.</p> <p>Full regard must be had to the issue of household growth and meeting the requirements that are established by the soon to be adopted Structure Plan and subsequently, the emerging Regional Spatial Strategy.</p>		<p>Support noted.</p>

12.1 Gloucestershire Waste Planning Authority	Key Issues - Paragraph 4.40	Support	Support paragraph 4.40 which highlights the importance of waste and recycling issues in the City – this could be tied in with the preparation of the Waste Management Core Strategy currently being prepared by the County Council as Waste Planning Authority.		Support noted. Insert additional reference to the Waste Management Core Strategy document and the need for integration.
13.1 British Waterways	Key Issues - Environment	Object		Would like to see a reference to the River Severn and the Gloucester and Sharpness Canal as key elements of the environment of Gloucester.	Agree that reference should be made to the River Severn and Gloucester-Sharpness Canal.
13.2 British Waterways	Key Issues	Object		The management and enhancement of the river and canal and their corridors should be a key issue to be addressed through the strategy.	Agree. See response above.

13.3 British Waterways	Key Issues	Support	Support points 13 and 14 relating to heritage and brownfield land.		Support noted.
14.8 South West Regional Assembly	Key Issues - Paragraphs 4.7 – 4.10	Object		Reference is made to 'households' and to 'housing'. These are two different things and it would be helpful to clarify the difference or to provide a description of what a 'household' is. Further, do the figures given relate to households or dwellings (housing)?	This sentence has been deleted.
17.5 Tweedale Limited representing I.M. Group Limited	Key Issues – Economy	Object		Suggested that reference should be made to the strategic importance of the employment allocations in the southern part of the City with specific reference to the land at Waterwells Farm and within the proposed Quedgeley development area. Also that there is scope to expand the	Agree that reference could usefully be made to the role and importance of Waterwells Business Park and RAFQ as strategic employment locations.

				areas for appropriate employment uses in these locations further.	
18.1 Tetlow King Planning representing the South West RSL Planning Consortium	Key Issues - paragraph 4.47	Support	Support this summary in principle.		Support noted.
18.2 Tetlow King Planning representing the South West RSL Planning Consortium	Key Issues - paragraph 4.47	Object		Suggest a further issue should be added to state that: 'Gloucester has a severe affordability problem and high levels of housing need'.	Key issue 12 already refers to the acute need for affordable housing in Gloucester. No further changes are considered necessary.
20.8 Environment Directorate – Gloucestershire County Council	Key Issues	Object		Point 2 should refer to preventing coalescence of settlements.	Agree that reference could usefully be made to the importance of preventing the coalescence of settlements.

20.9 Environment Directorate – Gloucestershire County Council	Key Issues	Object		Point 7 should clarify in what ways Gloucester is lagging behind Cheltenham and Worcester.	This sentence has been deleted.
20.10 Environment Directorate – Gloucestershire County Council	Key Issues	Object		Include the point: Apart from on a few routes, public transport services (rail and bus) to access the City are poor in terms of the standard of the vehicle used, reliability, and frequency of service.	Disagree. Reference is already made to the need to improve public transport provision in order to reduce the use of the car.
20.11 Environment Directorate – Gloucestershire County Council	Key Issues	Object		Include the point: Although improving, in many parts of the City the urban environment and infrastructure does not encourage residents to walk and cycle to access facilities and services.	Agree in part. Insert reference to the need to encourage more walking and cycling.

20.12 Environment Directorate – Gloucestershire County Council	Key Issues	Object		Another key issue is the need to tackle climate change.	Agree. Insert new strategic objective and core policy relating to climate change.
21.3 Government Office of the South West	Key Issues	Object	It would be more useful to list the details of the population make up in terms of age than gender. This would assist in provision of healthcare, education, recreation, sheltered housing etc.		This sentence has been deleted.
21.4 Government Office of the South West	Key Issues	Object	The summary of the Key Issues doesn't refer to the restrictions of the Green Belt.		Insert reference to the Gloucester – Cheltenham Green Belt.
28.1 A Knipe	Key Issues / Vision / Strategic Objectives	Object	Develop Kings Square with good stores. No skating rink. The pavements are poor.		Comment noted. The future of King's Square will be determined through the Central Area Action Plan Development Plan Document.

28.2 A. Knipe	Key Issues / Vision / Strategic Objectives	Object	Get the centre of the city right, and clean it before thinking about the Docks development or there will be a ghost town in 10 years.		Comment noted. The proposed Spatial Strategy emphasises the importance of regenerating the Central Area, which should lead to qualitative improvements in the City Centre.
28.3 A Knipe	Key Issues / Vision / Strategic Objectives	Object	With the increase in traffic you will have to start thinking about water again – each one could take 5 lorries off the roads.		Comment noted.
Spatial Vision					
5.2 Highways Agency	Spatial Vision for Gloucester	Support	Support Option 5.		Support noted.

7.4 The Barton Willmore Planning Partnership representing Kayterm Plc	Spatial Vision	Support	Support Option 5B. This would appear to be the most realistic and appropriate for planning policies.		Support noted.
7.5 The Barton Willmore Planning Partnership representing Kayterm Plc	Spatial Vision	Support	Pleased to see that the Council have revised the Vision, replacing the word 'against' by 'with'.		Support noted.
9.2 Gerald Eve representing British Energy Plc	Spatial Vision	Support	Support Option 4 as this is the closest to the principles set out in the Governments Sustainable Development Strategy and PPS 1 – Delivering Sustainable Development.		Support noted.

13.4 British Waterways	Spatial Vision	Support	Support Option 1. Option 3 would be acceptable but is a bit too long.		Support noted.
14.9 South West Regional Assembly	Spatial Vision	Object	The Vision for the City needs to be specific to Gloucester. Where is the City going? What does it want to achieve and be like by the end of the Plan period?		Agree that the vision should be specific to Gloucester.
14.11 South West Regional Assembly	Spatial Vision	Object	The RSS Joint Study Area (JSA) is developing a Vision for the Cheltenham and Gloucester areas and you should therefore be mindful of this work when developing the Core Strategy. RPB initial thoughts provided.		Comment noted.

15.2 Environment Agency	Spatial Vision	Object.	<p>The Vision should clearly reflect the statutory duty to contribute to achieving sustainable development, be locally distinctive, and provide a steer for the planning system.</p> <p>It would appear that none of the Options appear to be locally distinctive, in that they could refer to any City, anywhere.</p>		Agree that the vision should be made more specific to Gloucester.
15.3 Environment Agency	Spatial Vision	Support		Support Option 1 provided the Vision and the underlying aims are combined and the word 'promote' is changed to 'achieve' as this is more aspirational.	Support noted.
15.4 Environment Agency	Spatial Vision	Object	Option 2 is fundamentally a 'social' vision and does not refer to the environment, natural resources, or the economy, which are the other aims of sustainable development.		Comment noted.

15.5 Environment Agency	Spatial Vision	Support	Option 3 is acceptable as it makes reference to the aims of sustainable development.	The word 'promoted' should be changed to 'achieved as this gives a more positive vision	This option has not been selected as the preferred option.
15.6 Environment Agency	Spatial Vision	Object	Option A, D, and E are unacceptable as they make no reference to the environment or sustainable development.		Comment noted.
15.7 Environment Agency	Spatial Vision	Support	Support Option 5, as this is an all-encompassing Vision.		Support noted.
16.1 English Heritage (South West Region)	Spatial Vision	Support	Support the Spatial Vision as outlined in Option 1.		Support noted.

17.6 Tweedale Limited representing I.M. Group Limited	Spatial Vision for Gloucester	Support	Support Option 5B as it is the most realistic and addresses the balance between the need to allow for new development against the need to protect the environment.	Suggest that the words 'to create' should be added at the beginning of the statement.	Support noted.
18.3 Tetlow King Planning representing the South West RSL Planning Consortium	Spatial Vision	Support	Broadly support all 'visions' however must ensure that social well being, fairness and inclusion are a part of whichever vision is adopted.		Support noted.
20.28 Environment Directorate – Gloucestershire County Council	Spatial Vision	Support	Option 3B is an appropriate Vision for Gloucester's LDF to achieve.		Support noted.
20.29 Environment Directorate – Gloucestershire County Council	Spatial Vision	Support	Support the combination of Options 1 and 3(D)		Support noted.

20.30 Environment Directorate – Gloucestershire County Council	Spatial Vision	Support	Support Paragraph 4.40 highlighting the importance of waste and recycling issues for the City. This could be tied in with preparation of the Waste Management Core Strategy currently being prepared by the County Council as Waste Planning Authority.		Support noted. Insert additional reference to the Waste Management Core Strategy document and the need for integration.
22.3 Tesco Stores Limited	Spatial Vision	Support	Consider that Option 1 or Option 5B best reflects the Vision for Gloucester within a spatial planning context. However, the current Vision within Option 1 'To create a City that looks good and feels good' is too broad and general in nature. Therefore the underlying aim of the vision 'To promote the economic, social and environmental wellbeing of the City...' should constitute a preferred Option 1.		Comment noted.
27.1 Mr M White	Spatial Vision	Support	Support Option 3.		Support noted.

Strategic Objectives						
2.1 The Woodland Trust	Strategic Objectives – Objective 3	Support	Support revised Objective SO3 which now includes the wording ‘To protect, conserve, and enhance biodiversity, landscape...’			Support noted.
2.2 The Woodland Trust	Strategic Objectives – Objective 7	Object	Object to the removal of the wording ‘...including publicly accessible open space’ – because it weakens the Strategy’s commitment to green-space provision.		Suggest the Woodland Trust Access Standards (see representation).	Agree that reference should be made to public open space.
2.3 The Woodland Trust	Strategic Objectives – Objective 16	Support	Support this objective as it highlights the need ‘To protect, conserve, and enhance the built and natural environment of the City’.			Support noted.

3.1 The British Wind Energy Association	Strategic Objectives – Objective 2	Support	Support.		Support noted.
4.1 Peacock and Smith representing WM Morrison Supermarkets PLC	Strategic Objectives – Objective 11	Support	Support.		Support noted.
7.6 The Barton Willmore Planning Partnership representing Kayterm Plc	Strategic Objectives – Objective 2	Object	SO2 is linked to Key Issue 2, namely 'the rate of household growth in Gloucester is twice the county average'.	Would suggest that a more planning-focussed Objective would state: 'SO2: To encourage sustainable housing development to meet the needs of the growing City of Gloucester'.	Agree that reference could usefully be made to achieving sustainable housing growth.

<p>7.7</p> <p>The Barton Willmore Planning Partnership representing Kayterm Plc</p>	<p>Strategic Objectives – Objective 3</p>	<p>Object</p>	<p>SO3 is linked to Key Issue 3 i.e. 'development of the city is constrained by</p>	<p>A more appropriate Strategic Objective would state:</p> <p>'SO3: To promote creative solutions to accommodating housing and employment growth in the City, balancing conservation with the need to develop economically'.</p>	<p>Disagree. Do not consider this to be a Strategic Objective.</p>
<p>7.8</p> <p>The Barton Willmore Planning Partnership representing Kayterm Plc</p>	<p>Strategic Objectives – Objective 13</p>	<p>Object</p>	<p>SO13 is linked to Key Issue 12 i.e. acute need for affordable housing in Gloucester.</p>	<p>Suggest that Strategic Objective 13 should read as follows:</p> <p>'SO13: To provide a mix and choice of house types to meet a range of needs and aspirations, encouraging the establishment of sustainable communities within the City'</p>	<p>Agree. Amend text as per suggested wording.</p>

<p>9.3</p> <p>Gerald Eve representing British Energy Plc</p>	<p>Strategic Objectives</p>	<p>Support</p>	<p>In principle, the Core Strategy will strike an appropriate balance. In particular, the need to make efficient use of land, and encourage areas of mixed-use is felt to be an important theme. It is considered that the strategic objectives are a balance, and as such, it could be inappropriate to prioritise specific strategic objectives above others.</p>		<p>Support noted.</p>
<p>10.1</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited</p>	<p>Strategic Objectives – Objective SO.1</p>	<p>Support</p>	<p>Support this Objective.</p>		<p>Support noted.</p>
<p>10.2</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited</p>	<p>Strategic Objectives – Objective SO.15</p>	<p>Object</p>		<p>The policy statement for this Objective should distinguish between ‘new’ and ‘necessary’ development.</p>	<p>Disagree. Good design should be a central tenet of all new development. This is consistent with advice set out in PPS 1 – Delivering Sustainable Development.</p>

10.3 Planning Perspectives representing SecondSite Property Holdings Limited	Strategic Objectives – Objective SO.20	Support	Support this Objective.		Support noted.
10.4 Planning Perspectives representing SecondSite Property Holdings Limited	Strategic Objective SO.21	Object		This Objective now excludes a reference to 'contamination' and this should be reinstated.	Agree that reference to contaminated land should be included. Amend text accordingly.
10.5 Planning Perspectives representing SecondSite Property Holdings Limited	Strategic Objectives – Objective SO.23	Support	The reference to encouraging mixed-use development in 'appropriate locations' is sufficient and the previous objection is withdrawn.		Support noted.

<p>11.1</p> <p>English Nature</p>	<p>Strategic Objectives – Objective SO.3</p>	<p>Support</p>	<p>Support an objective that refers to the need to maintain a high quality environment in terms of biodiversity, landscape character, air, soil, and water quality.</p>		<p>Support noted.</p>
<p>11.2</p> <p>English Nature</p>	<p>Strategic Objectives – Objective SO.3</p>	<p>Object</p>		<p>Would like to see a reference to both the environment and sustainable development. Would suggest that the Objective links to other issues other than the constraints imposed by development. There is a lot of research that suggests that biodiversity and landscape are valuable in maintaining or improving health. There is also a link between maintaining an attractive natural environment and encouraging businesses and residents to re-locate to an area with obvious benefits for economic regeneration.</p>	<p>Disagree. It is considered that these matters are already dealt with adequately.</p>

12.2 Gloucestershire Waste Planning Authority	Strategic Objectives, Objective SO.2	Support	Support this objective, which seeks to address resource usage and waste issues – this could be tied in with the Waste Minimisation SPD which is currently being prepared.		Support noted. Agree that reference could usefully be made to the County Council's proposed Waste Minimisation SPD.
13.5 British Waterways	Strategic Objectives	Support	Support the wide range of issues addressed through the Strategic Objectives.		Support noted.
13.6 British Waterways	Strategic Objectives	Object		An additional objective should be added in relation to regeneration of the waterways and the waterfront areas, including the Docks. This could be a separate Objective, or added to Objective SO.17.	Agree that reference to the regeneration of the waterways and the waterfront areas could be usefully incorporated into the document. Amend text accordingly.
15.8 Environment Agency	Strategic Objectives, Objective SO.3	Support	Support the inclusion this objective.		Support noted.

17.7 Tweedale Limited representing I.M. Group Limited	Strategic Objectives – Objective SO.18	Object	Whilst it is acknowledged that current Government Guidance seeks to re-use previously developed land in the first instance in order to protect Greenfield land resources, it should be noted that the guidance also permits the development of Greenfield sites where they be in a more sustainable location than a brownfield site.		Amend strategy to refer to the potential release of greenfield sites only in exceptional circumstances where it can be shown that the City's development needs cannot be met through the release of previously developed land and buildings.
18.4 Tetlow King Planning representing the South West RSL Planning Consortium	Strategic Objectives	Support	Support all objectives in this section, particularly SO.1, SO.5 and SO.13.		Support noted.
20.13 Environment Directorate – Gloucestershire County Council	Strategic Objectives – Objective SO.2	Object	As people may have different and conflicting needs and opinions, this objective may be difficult to realise.		Agree that this strategic objective should be clarified. Amend text accordingly.

20.14 Environment Directorate – Gloucestershire County Council	Strategic Objectives – Objective SO.4	Object		This should be reworded to read ‘...to enable better provision for and use of public transport, park and ride, walking, and cycling.	Agree. Insert reference to public transport, walking and cycling.
20.15 Environment Directorate – Gloucestershire County Council	Strategic Objectives – Objective SO.11	Object		Add the following wording ‘...to promote healthy and active lifestyles, especially within schools and workplaces in order to prevent ill health.	Agree in part. Amend text to refer to the need to improve people’s ability to engage in healthy activities.
20.16 Environment Directorate – Gloucestershire County Council	Strategic Objectives – Objective SO.18	Object		This Objective should be expanded (in accordance with PPS 1 paragraphs 17 and 18) to read ‘To maintain and where possible enhance a high quality environment in terms of biodiversity landscape character, air, soil and water quality’.	Agree. Amend text.

20.17 Environment Directorate – Gloucestershire County Council	Strategic Objectives – Objective SO.19	Object		This should be expanded to include sustainable drainage systems within an overall context of reducing flood risk.	Agree. Insert reference to sustainable drainage systems.
20.18 Environment Directorate – Gloucestershire County Council	Strategic Objectives – Objective SO.20	Object		Add 'maximising residential densities' to the end of the Objective.	Disagree. High-density development is not solely concerned with residential development.
20.19 Environment Directorate – Gloucestershire County Council	Strategic Objectives – Objective 21	Object		Add 'phasing with any Greenfield site as appropriate' to the end of the Objective.	Agree in part. Amend strategy to refer to the potential release of greenfield sites only in exceptional circumstances where it can be shown that the City's development needs cannot be met through the release of previously developed land and buildings.

<p>20.20</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Strategic Objectives – Objective SO.26</p>	<p>Object</p>		<p>This objective should be amended to read:</p> <p>‘To reduce the consumption of natural resources through environmentally friendly construction and the promotion of renewable forms of energy including onsite generation of energy from renewable resources within development’.</p>	<p>Agree. Amend text as per suggested wording.</p>
<p>20.21</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Strategic Objectives – Objective SO.26</p>	<p>Support</p>	<p>This Objective is supported as it seeks to address resource usage and waste issues. It could be tied into the Waste Minimisation SPD that is currently being prepared. It should be a separate Strategic Objective.</p>		<p>Support noted. Insert reference to Waste Minimisation SPD.</p>

<p>20.22</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Strategic Objectives</p>	<p>Object</p>		<p>Add the following objective:</p> <p>To improve the quality and frequency of public transport links between Gloucester and other towns/cities in the region, to help promote sustainable tourism and business links.</p>	<p>Disagree. This issue is considered to be covered by other strategic objectives relating to the need to reduce the need to travel by car. No change.</p>
<p>20.23</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Strategic Objectives</p>	<p>Object</p>		<p>Add the following Objective:</p> <p>To ensure that new development is supported by good quality public transport, walking and cycling links to the City Centre and local services.</p>	<p>Agree in part. Insert reference to the need to provide good quality public transport, walking and cycling links.</p>

<p>20.24</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Strategic Objectives</p>	<p>Object</p>		<p>Add the following Objective:</p> <p>To work in partnership with local and strategic bodies (e.g. Strategic Partnership, Gloucestershire First) and major employers to ensure that existing sites and future developments operate sustainably with due concern for the environment in which they are located.</p>	<p>Do not agree that this is a strategic objective.</p>
<p>20.25</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Strategic Objectives</p>	<p>Object</p>		<p>Add the following Objective</p> <p>To promote and use land adjacent to the Gloucester and Sharpness Canal for industrial development linked to the use of the canal for freight transport.</p>	<p>Agree in part. Insert reference to the need to make better use of the canal and River Severn.</p>

20.26 Environment Directorate – Gloucestershire County Council	Strategic Objectives	Object		A new Strategic Objective should be introduced setting out the City Council’s commitment to sustainable development aimed specifically at tackling climate change.	Agree. Insert reference to sustainable development and the need to tackle climate change.
20.27 Environment Directorate – Gloucestershire County Council	Strategic Objectives	Object	Many of the Objectives are interlinked, however given limited resources some may need to be prioritised over others. In our view transport related Objectives should be of high priority, as many of the other Objectives will be undermined if the transport ones are not in place.		Disagree. It is not considered appropriate to try and ‘rank’ the strategic objectives. They are all important and although many may hinge on the transport related objectives it would not be helpful to prioritise.
21.5 Government Office of the South West	Strategic Objectives	Object		Strategic Objective 2 refers to ‘promotion of renewable forms of energy’ and a more positive Objective would be to say ‘...USE of renewable energy’.	Agree. Amend text as per suggested wording.

Spatial Strategy						
<p>1.5</p> <p>Robert Hitchins Limited</p>	<p>Spatial Strategy - Paragraph 7.5</p>	<p>Object</p>			<p>This should make reference to the fact that although the City is almost built up to its northern limits in respect of political boundaries, there is land at the northern edge of Gloucester, falling within Tewkesbury Borough Council, which is also within the Gloucester PUA.</p>	<p>Agree that the spatial strategy should make clearer reference to the land around Gloucester, which forms part of the wider Gloucester PUA.</p>
<p>1.6</p> <p>Robert Hitchins Limited</p>	<p>Spatial Strategy – Underlying Principles, Paragraph 7.12 (Bullet Point 18)</p>	<p>Support</p>	<p>Support inclusion of this as it acknowledges the contribution of surrounding Districts.</p>			<p>Support noted.</p>

4.2 Peacock and Smith representing WM Morrison Supermarkets PLC	Spatial Strategy	Support	Support the proposed Spatial Strategy. In particular encouraging a good balanced mix of uses in the Central Area and creating a balanced network of district and local centres that provide a range of shops and services for local people - including the creation of new ones in appropriate locations.		Support noted.
5.3 Highways Agency	Spatial Strategy	Support	Broadly support the Spatial Strategy.		Support noted.
5.4 Highways Agency	Spatial Strategy	Object	<p>The Spatial Strategy has now been modified to include reference to the '...contribution of adjoining districts such as Tewkesbury in meeting the future development needs of the Gloucester PUA.</p> <p>Object as Council should not prejudice the requirements of the RSS for the South West. Also any policy should accord to the requirements of the Gloucestershire</p>		<p>Disagree. Early indications over housing figures set out in the draft RSS suggest that land in Tewkesbury Borough will be needed to accommodate the required level of housing growth in the Gloucester PUA.</p> <p>No change.</p>

			Structure Plan until the RSS is published.		
6.1 RPS Planning representing Costco Wholesale UK Ltd/LXB Properties	Spatial Strategy	Support	Fully support focus of development within the central area – specifically the need for the Railway Triangle site to be recognised as appropriate for urban regeneration.		Support noted.
7.9 The Barton Willmore Planning Partnership representing Kayterm Plc	Spatial Strategy	Object	Concern that the proposed Spatial Strategy does not adequately address the needs of the whole administrative area. There are some areas of the identified Spatial Strategy that could create barriers to other forms of sustainable and appropriate development.		Disagree. Whilst the focus of the Spatial Strategy is the Central Area, it seeks to meet the needs of the wider area. It is however a fact that, in terms of new development, much of the wider city area has already been developed.

8.1 Bidwells Carpenter Planning on behalf of Peregrine Gloucester Limited	Spatial Strategy	Support	Support the proposed Spatial Strategy (realisation of full potential of brownfield land, encouraging the most efficient use of land and buildings) so long as there is not an over-emphasis on the City Centre relative to other sustainable locations within the urban area.		Support noted. The strategy allows for modest growth in sustainable locations outside the urban area.
9.4 Gerald Eve representing British Energy Plc	Spatial Strategy	Support	Support the Spatial Strategy. Encouragement of areas of mixed-use in accordance with national planning policy will assist in reducing reliance on cars.		Support noted.
14.10 South West Regional Assembly	Spatial Strategy	Object	The Spatial Strategy seems broadly appropriate, although in being focussed very firmly on the regeneration of the central area, it is lacking in addressing other wider issues of importance to the City and its sub-region. Whilst supporting the concentration		Agree that the Spatial Strategy should be revised to reflect the strategic context set by the Regional Spatial Strategy including the role of Gloucester as a Principal Urban Area and the need to consider

			of efforts on regeneration as one of the key aims of the Core Strategy, it must be seen in the context of other important key issues such as the need to respond positively to the strategic context to be set by the RSS and for Gloucester to look at the need for growth as a PUA (Working together with neighbouring local authorities).		cross-boundary issues and joint-working.
10.6 Planning Perspectives representing SecondSite Property Holdings Limited	Spatial Strategy - Paragraphs 6.9 – 6.11	Support	Support these paragraphs.		Support noted.
12.3 Gloucestershire Waste Planning Authority	Spatial Strategy - Paragraph 6.13	Object		This could include waste/recycling principles to follow through the statement made in paragraph 4.2.	Agree that reference to waste and recycling should be made in the Spatial Strategy.

13.7 British Waterways	Spatial Strategy	Support	Support the broad approach of focussing the majority of new development towards the central area.		Support noted.
13.8 British Waterways	Spatial Strategy	Object		The Central Area should include the length of the canal from the Docks to the Two Mile Bend.	The 'Central Area' is the same as the Gloucester Heritage Urban Regeneration Company area and does include this stretch of land. No change.
13.9 British Waterways	Spatial Strategy	Support	Support the proposal for an Area Action Plan based on the GHURC area.		Support noted.

13.10 British Waterways	Spatial Strategy	Object	It is unclear from this report how the Strategy and Action Plan will work together.		Disagree. The Central Area Action Plan will be the practical tool through which the Spatial Strategy will be implemented.
13.11 British Waterways	Spatial Strategy	Object		An extra bullet point should be added: <ul style="list-style-type: none"> •1 Creating an attractive and vibrant waterfront for both residents and visitors. 	Disagree. This issue is already considered to be adequately covered.
13.12 British Waterways	Spatial Strategy – Underlying Principles	Support	Support the principles proposed and the focus on the central area.		Support noted.

13.13 British Waterways	Spatial Strategy – Underlying Principles	Object		The bullet point ‘Resisting out of centre retail and leisure proposals...’ would be clearer if it were to say ‘outside the Central Area’, as defined under paragraph 7.10.	Disagree. In line with Government guidance retail development needs to be steered into or next to the City Centre. The Central Area covers too wide an area.
14.12 South West Regional Assembly	Spatial Strategy - Paragraph 7.3	Object		Paragraph 7.3 refers to SO.1 in the context of the regeneration off central Gloucester. However it is SO.17 on the proceeding page that refers to the regeneration of central Gloucester.	This sentence has been deleted.
15.10 Environment Agency	Spatial Strategy	Support	Support the proposed Spatial Strategy.		Support noted.

<p>15.11</p> <p>Environment Agency</p>	<p>Spatial Strategy</p>	<p>Object</p>		<p>It is difficult from Appendix 3 'Key Diagram' to ascertain if parts of the proposed central area are located within flood zones.</p> <p>Therefore it is recommended that a Strategic Flood Risk Assessment is undertaken to ensure that the proposed central area meets the requirements of the sequential test for the development plan and any future windfall allocations.</p>	<p>Disagree. The key diagram is intended to be schematic only. The floodplain will be shown on the Proposals Map.</p> <p>Flood risk will be determined through the Central Area Action Plan and the Site Allocations and Designations (Non-Central Area) documents.</p>
<p>15.12</p> <p>Environment Agency</p>	<p>Spatial Strategy (Paragraph 7.12)</p>	<p>Object</p>		<p>The underlying principles of the proposed strategy refer to the protection of the floodplain of the River Severn but not the floodplains of other watercourses. This should be amended to include all floodplains.</p>	<p>Agree. Amend text to refer to other watercourses.</p>

<p>16.3</p> <p>English Heritage (South West Region)</p>	<p>Spatial Strategy</p>	<p>Support</p>	<p>Broadly support the aim of focussing the majority of the growth in the central area (as defined by Appendix 1).</p> <p>The work must be carried out with the aim of integrating any new development with the historic environment and the quality of design must be high in order to reflect the 'unique character and traditional urban form of the historic city' (Second Stage Deposit Local Plan 2002).</p>		<p>Support noted. Insert additional reference so that the need to integrate any new development with the historic environment is fully acknowledged in the Spatial Strategy.</p>
<p>16.4</p> <p>English Heritage (South West Region)</p>	<p>Spatial Strategy</p>	<p>Object</p>		<p>In the underlying principles of the proposed spatial strategy there is a recognition that the historic environment should be protected – this should be extended to recognise the role and contribution these assets can play in creating a sense of place and in the regeneration of the central area.</p>	<p>Agree. Expand text in relation to the protection of the historic environment.</p>

<p>17.8</p> <p>Tweedale Limited representing I.M. Group Limited</p>	<p>Spatial Strategy – Paragraph 7.6.</p>	<p>Object</p>	<p>Whilst it is acknowledged that there are severe constraints on potential developments opportunities around the City, and that the southern limit of the City will soon be reached with the continued development of Waterwells Farm and the start of the redevelopment of RAF Quedgeley – there remains opportunities for further development in this general area.</p>		<p>Although the Spatial Strategy seeks to focus most new development into the Central Area it allows for modest growth in sustainable locations outside the Central Area.</p> <p>Amend strategy to include a sequential approach whereby greenfield sites are able to come forward once brownfield opportunities have been exhausted.</p>
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<p>17.9</p> <p>Tweedale Limited representing I.M. Group Limited</p>	<p>Spatial Strategy – Paragraph 7.12</p>	<p>Support</p>	<p>Support the inclusion of this paragraph.</p>		<p>Support noted.</p>
<p>17.10</p> <p>Tweedale Limited representing I.M. Group Limited</p>	<p>Spatial Strategy – Paragraph 7.14.</p>	<p>Object</p>	<p>Greenfield sites should not be protected merely for their own sake if they lie in an appropriate location to create a more sustainable development opportunity.</p>		<p>Although the Spatial Strategy seeks to focus most new development into the Central Area it allows for modest growth in sustainable locations outside the Central Area.</p> <p>Amend strategy to include a sequential approach whereby greenfield sites are able to come forward once brownfield opportunities have been exhausted.</p>

<p>18.5</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium</p>	<p>Spatial Strategy</p>	<p>Object</p>	<p>Agree in principle that most (but not all) development should be focussed in the central area of Gloucester.</p> <p>However it should be recognised that this will not adequately meet housing needs. Where affordable housing is concerned this should be provided where there is a need. This will not be confined to the central area, but will arise all across the local authority area. The plan should be sufficiently flexible to allow for Greenfield sites and sites on the edge of Gloucester to come forward where they can provide affordable housing.</p>		<p>Although the Spatial Strategy seeks to focus most new development into the Central Area it allows for modest growth in sustainable locations outside the Central Area.</p> <p>It is fully acknowledged that there is a citywide need for affordable housing provision.</p> <p>Amend strategy to include a sequential approach whereby greenfield sites are able to come forward once brownfield opportunities have been exhausted.</p>
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<p>19.1</p> <p>Boyer Planning representing the Trustees of Winnycroft Farm and Associated Parties</p>	<p>Spatial Strategy</p>	<p>Object</p>	<p>Concern that the Council is putting forward only one Option for the Spatial Strategy. Given the need to progress the LDF documents in advance of RSS 10, it is essential that various Options be put forward for testing to reflect different possible growth levels.</p>		<p>Disagree. The timing of the LDF process will allow the emerging RSS to be taken fully into account. Early indications in relation to housing figures for Gloucester City suggest that the proposed Spatial Strategy should be capable of meeting the required level of housing growth whilst allowing for modest growth at sustainable locations outside the urban area.</p>
<p>19.2</p> <p>Boyer Planning representing the Trustees of Winnycroft Farm and Associated Parties</p>	<p>Spatial Strategy</p>	<p>Object</p>	<p>In these circumstances the Council's approach of focussing new development on central area regeneration is too limited. The Gloucester Heritage URC has a target of providing 3,000 – 3,500 new homes, emphasising that other sources of capacity will be required. Irrespective of this, there are plainly housing opportunities elsewhere in the administrative area in the form</p>	<p>In accordance with Government policy (PPG 3, paragraph 30) there clearly needs to be a sequential approach to site selection in which priority can properly be given to the central area and other previously developed land and buildings.</p>	<p>The spatial strategy is in line with Government Guidance set out in PPG3 in that it seeks to realise the potential of previously developed land and buildings in sustainable central locations, before consideration will be given to less sustainable,</p>

			<p>of existing commitments, windfall opportunities, and potential Greenfield sites.</p> <p>Concern raised that the Council has made no serious attempt to evaluate the relative merits of different Greenfield site options.</p>		<p>more peripheral, greenfield options.</p> <p>The strategy does not preclude the development of greenfield land rather it seeks to prioritise the release of land in favour of previously developed sites. This is considered to be in accordance with Government policy.</p>
<p>19.3</p> <p>Boyer Planning representing the Trustees of Winnycroft Farm and Associated Parties</p>	Spatial Strategy	Object	<p>Reference is made to a number of constraints (environmentally sensitive parts of the city, heritage sites, public open space etc) but no attempt has been made to evaluate the relative importance of any land affected by such designations, and until this is done, the Core Strategy will not deal comprehensively or satisfactorily with the full range of considerations that need to inform its Spatial Strategy.</p>		<p>The relative importance of land and its potential for development will be dealt with through the Council's two site-specific development plan documents.</p> <p>The Core Strategy is intended to set out in broad terms, the Council's overall policy towards the future growth of Gloucester.</p>

20.4 Environment Directorate – Gloucestershire County Council	Spatial Strategy – Paragraph 7.12	Object		This paragraph should include the creation of a Green Infrastructure (or ‘Green Grid’) based on existing and new sites to benefit the health and well being of people and wildlife. Such a principle is likely to be promoted by the Regional Assembly who are currently researching the topic of Green Infrastructure.	Agree. Insert additional reference to green space.
20.5 Environment Directorate – Gloucestershire County Council	Spatial Strategy – Paragraph 7.12	Object		This could include waste/recycling principles to follow through the statement made in paragraph 4.2.	Agree. Insert reference to waste and recycling in the Spatial Strategy.
20.6 Environment Directorate – Gloucestershire County Council	Spatial Strategy – Paragraph 7.12	Object		The incorporation of renewable energy schemes and sustainable drainage systems within new development should be an underlying principle.	Agree. Insert reference to renewable energy and sustainable drainage.

20.7 Environment Directorate – Gloucestershire County Council	Spatial Strategy – Paragraph 7.12	Support	Broadly support the underlying principles of the Spatial Strategy.		Support noted.
21.7 Government Office of the South West	Spatial Strategy	Object		Would like to see a reference to identifying directions of growth, working with neighbouring authorities, density targets, and affordable and renewable targets.	Agree. Amend text accordingly.
21.8 Government Office of the South West	Spatial Strategy	Object	It is not clear how the policies relate to the identified issues.		Disagree. There are clear links between the key issues, strategic objectives and core policies.

<p>22.1</p> <p>Tesco Stores Limited</p>	<p>Spatial Strategy</p>	<p>Support</p>	<p>Support the overarching objective of focussing the majority of (but not all) new development in the central area of Gloucester, provided it is considered alongside the Governments objectives in PPS 6 and the process for selecting development sites, viz:</p> <ul style="list-style-type: none"> •7 Assessing the need for development •8 Identifying the appropriate scale of development •9 Applying the sequential approach to site selection •10 Assessing the impact of development on existing centres •11 Ensuring that locations are accessible and well served by a choice of means of transport. 		<p>Support noted. Guidance set out in PPS6 is fully acknowledged.</p>
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22.2 Tesco Stores Limited	Spatial Strategy	Object		The extent of the central area in the key diagram (Appendix 3) could be clarified i.e. put alongside a footnote providing an explanation of the rationale for the boundaries chosen.	Agree that the boundary should be clarified. Disagree with the need for additional footnote. This area is based on the GHURC area, which will be the focus for regeneration in the City.
23.1 Westbury Homes (Holdings) Limited	Spatial Strategy, Paragraph 7.9 – third bullet point	Object		Amend this bullet point to the following: 'Realising the full development potential of previously developed land and buildings in order to reduce the need for Greenfield land'.	Agree. Amend text to state 'Realising the full development potential of previously developed land and buildings in order to reduce the need to build on Greenfield land'.
23.2 Westbury Homes (Holdings) Limited	Spatial Strategy – Paragraph 7.12, tenth bullet point.	Object		Amend this bullet point to the following: 'Permitting residential development in appropriate locations outside the central area giving priority to the	Agree. Amend text as per suggested wording.

				development of previously developed or 'brownfield' land in preference to Greenfield sites in less sustainable locations'.	
26.2 Cheltenham Borough Council	Spatial Strategy	Support	Support proposed Spatial Strategy.		Support noted.
27.2 Mr M White	Spatial Strategy	Support	Support the concept of the majority of future development taking place in the central area.		Support noted.
Core Policy 1 – Key Development Principles					
2.4 The Woodland Trust	Core Policy 1 – Key Development Principles	Support	Support this Core Policy as it states the strategy's commitment to both '...the fundamental principles of sustainable development' and the need to protect and enhance the natural environment.		This policy has been deleted.

4.3 Peacock and Smith representing WM Morrison Supermarkets PLC	Core Policy 1 – Key Development Principles	Support	Support Option B.		This policy has been deleted.
5.5 Highways Agency	Core Policy 1 – Key Development Principles	Support	Support Option A as it seeks to contribute to a reduction in car use and ensure that development does not create an unacceptable burden on infrastructure that cannot be addressed.		This policy has been deleted.
7.10 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 1 – Key Development Principles	Object	Object to such a broad policy being applied to specific proposals. Do not feel that this kind of overarching policy is required.		This policy has been deleted.

7.11 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 1 – Key Development Principles	Support	If an overarching policy was to be applied, would support Option B as this is more straightforward than Option A		This policy has been deleted.
10.7 Planning Perspectives representing SecondSite Property Holdings Limited	Core Policy 1 – Key Development Principles	Object		The expectation that proposals should contribute to a reduction in car use is too prescriptive. A reference to reducing the need to travel, especially by the private car, would be more appropriate and more consistent with Structure Plan terminology.	This policy has been deleted.
11.3 English Nature	Core Policy 1 – Key Development Principles	Support	Support Option A as it makes it clear that development should be consistent with the principles of sustainable development and recognises the value of the natural environment.		This policy has been deleted.

12.4 Gloucestershire Waste Planning Authority	Core Policy 1 – Key Development Principles	Support	Support the Key Principles that have been identified.		This policy has been deleted.
12.5 Gloucestershire Waste Planning Authority	Core Policy 1 – Key Development Principles	Object	The second bullet point relating to sustainable development would benefit from outlining what constitute elements it relates to over and above those bullets already stated – in particular Gloucester City's recycling services and the wider aims of minimising waste from new developments.		This policy has been deleted.
13.14 British Waterways	Core Policy 1 – Key Development Principles	Support	Support Option A as this gives much greater clarity by setting out a list of criteria to be met by the proposed developments.		This policy has been deleted.

15.13 Environment Agency	Core Policy 1 – Key Development Principles	Support	Support Option A as this overarching general policy sets basic targets for all development.		This policy has been deleted.
16.5 English Heritage (South West Region)	Core Policy 1 – Key Development Principles	Support	Core Policy 1 is broadly supported as the proposed changes go some way to recognise the importance attached to the built historic environment in the GHURC.		This policy has been deleted.
17.11 Tweedale Limited representing I.M. Group Limited	Core Policy 1 – Key Development Principles	Support	Support Option B as it provides a clear and concise statement which accords with national planning policy guidance with regard to new development. Individual key elements of the policy could be expanded upon in the reasoned justification of the policy.		This policy has been deleted.

20.31 Environment Directorate – Gloucestershire County Council	Core Policy 1 – Key Development Principles	Support	The Key Principles identified are supported.		This policy has been deleted.
20.32 Environment Directorate – Gloucestershire County Council	Core Policy 1 – Key Development Principles – Second Bullet Point	Object		This would benefit from outlining what constitute elements this relates to over and above those bullets already listed. Particularly in relation to Gloucester City's recycling services and the wider aims of minimising waste from new developments.	This policy has been deleted.
20.33 Environment Directorate – Gloucestershire County Council	Core Policy 1 – Key Development Principles – Fifth Bullet Point	Object		It would be difficult for a development to contribute to a reduction in car use. Suggest rewording: 'Result in a minimum impact on the highway network and contribute to improvements in and the increased use of public transport, park and ride,	This policy has been deleted.

				walking, and cycling.	
20.34	Environment Directorate – Gloucestershire County Council	Core Policy 1 – Key Development Principles	Object	A key principle should be for energy efficiency measures to be incorporated within new development to help reduce greenhouse gas emissions.	This policy has been deleted.
20.35	Environment Directorate – Gloucestershire County Council	Core Policy 1 – Key Development Principles	Object	An overarching policy as proposed should set the overall context for all new development. Small developments should be included, as incrementally these will have a significant impact on their surroundings over the plan period.	This policy has been deleted.
20.36	Environment Directorate – Gloucestershire County Council	Core Policy 1 – Key Development Principles – Bullet Point 3	Object	Suggest that the wording is changed to ‘respects and enhances’.	This policy has been deleted.

20.37 Environment Directorate – Gloucestershire County Council	Core Policy 1 – Key Development Principles	Object	If an overarching policy is used, it should be consistent with other approaches used in other plans and strategies in existence or currently being developed (e.g. the size of development thresholds used for the parking standards in the Gloucestershire Local Transport Plan and PPG 13).		This policy has been deleted.
22.5 Tesco Stores Limited	Core Policy 1 – Key Development Principles	Support	Option B preferred.		This policy has been deleted.
Core Policy 2 – Housing Provision					
1.7 Robert Hitchins Limited	Core Policy 2 – Housing Provision	Support	Support Option D		Support noted.

5.6 Highways Agency	Core Policy 2 – Housing Provision	Support	Support Option A as it is the least detrimental to the Agency's interests and delivers the greatest certainty about the number of houses to be built in the City over the next 15 years and that it will only consider development that promotes the use of Brownfield land and accessibility by a choice of means of transport.		Support noted.
7.12 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 2 – Housing Provision	Support	Support Option B although feel that Option D is also important.		Support noted.
7.13 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 2 – Housing Provision	Object	Object to the inclusion of the following text as it is overly onerous: 'In allocating sites and in considering speculative applications for residential development the Council will only consider sites that:		Comment noted.

			<ol style="list-style-type: none"> 1. Are consistent with the Councils Spatial Strategy 2. Involve the re-use of previously developed land and buildings 3. Are accessible by a choice of means of transport 4. Are well related to existing shops and services 		
9.5 Gerald Eve representing British Energy Plc	Core Policy 2 – Housing Provision	Support	<p>Support Option D, that the housing requirement should be based on the emerging Regional Spatial Strategy (RSS) given the likely limited life of the 'saved' structure plan once adopted.</p> <p>As the 'preferred options' consultation in January 2006 will emerge after the publication of draft RSS, the figures should be based on those within the draft RSS, but arbitrary phasing should be avoided.</p>		Agree. Incorporate housing figures set out in draft RSS. Amend text accordingly.
10.8 Planning Perspectives representing SecondSite Property	Core Policy 2 – Housing Provision	Support	The overall level of housing provision should be consistent with whatever figure is ultimately adopted under the Third Alteration to the Structure Plan.		Support noted. The Council will adopt the 'plan monitor manage' approach towards the release of windfall sites

Holdings Limited			The figure should however be treated as a guideline and not exclude unallocated windfall sites from coming forward.		in line with Government policy.
11.4 English Nature	Core Policy 2 – Housing Provision	Object		<p>It is noted that all of the proposed Options involve the re-use of previously developed land. Brownfield sites can provide good wildlife habitats and may even support legally protected species.</p> <p>Developers should therefore be required to undertake ecological surveys when proposing to redevelop sites that are likely to have any ecological value.</p>	Comment noted. This issue will be more appropriately dealt with through the Council's Development Control Policies document and Site-Specific development plan documents. No change.
14.13 South West Regional Assembly	Core Policy 2 – Housing Provision	Object	Given the position of the Structure Plan and the emerging RSS, it is difficult at the moment to be certain about the numbers that are appropriate for the LDF to allocate. Suggest that the appropriate approach is something in between the proposed Option B, of the Structure Plan Alteration figure		Agree. Incorporate housing figures set out in draft RSS. Amend text accordingly.

			being a minimum and the proposed Option D, where the Council suggests making sufficient provision (although this should also refer to provision being in appropriate in locations) to meet the requirements of the RSS (which will be the preferred Option of the RPB when the RSS is adopted. Close monitoring of the emerging RSS should be adhered to.		
17.12 Tweedale Limited representing I.M. Group Limited	Core Policy 2 – Housing Provision	Object		Amend point 2 to acknowledge that consideration will also be given to greenfield sites where they may lie in a more sustainable location than some brownfield sites.	Agree. Amend text accordingly.
19.4 Boyer Planning representing the Trustees of Winnycroft Farm and Associated Parties	Core Policy 2 – Housing Provision	Support	Support Option D as it would provide housing in accordance with the emerging RSS. Any attempt to base housing provision on the Structure Plan Third Alteration is fundamentally flawed having regard to the unresolved position as regards the role of Gloucester and Cheltenham within the County.		Agree. Incorporate housing figures set out in draft RSS. Amend text accordingly.

<p>19.5</p> <p>Boyer Planning representing the Trustees of Winnycroft Farm and Associated Parties</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object</p>	<p>Option D as it stands is unsatisfactory as it seeks to restrict housing sites to previously developed land and buildings.</p> <p>Whilst Government policy indicates that such sites are sequentially preferable to Greenfield sites (except where sustainability considerations indicate otherwise) there is no expectation that housing provision will be restricted to previously developed land. Consideration should be given to potentially suitable Greenfield sites as part of any housing strategy having regard to:</p> <ul style="list-style-type: none"> •2 The likely scale of housing provision that the LDF will need to accommodate. •3 The potential benefits of Greenfield land release in appropriate circumstances to deliver a range and choice of housing opportunities, physical and social infrastructure improvements and other planning benefits. 		<p>Agree that Core Policy 2 should provide clearer guidance in respect of the release of greenfield land for development in accordance with the sequential approach advocated by Government.</p> <p>Amend text accordingly.</p>
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20.38 Environment Directorate – Gloucestershire County Council	Core Policy 2 – Housing Provision	Support	The housing requirement up to 2016 should be placed on the Structure Plan Third Alteration. Sites should only be considered post-2016 if they do not involve the release of Greenfield land and are specifically referred to in the final RSS.		It is considered appropriate to base the housing figures set out in Core Policy 2 on the figures contained in the emerging Regional Spatial Strategy for the South West. Amend text accordingly.
20.39 Environment Directorate – Gloucestershire County Council	Core Policy 2 – Housing Provision	Object	Annual figures should not be used for housing delivery for the reasons outlined in the document.		Agree that the use of an annual housing figure is inappropriate.
20.40 Environment Directorate – Gloucestershire County Council	Core Policy 2 – Housing Provision	Object	There should not be a District-wide affordable housing requirement. Instead the affordable housing provision should be set on an individual site level (see Structure Plan Third Alteration Policy SC.4).		Disagree. The most recent housing needs survey data demonstrates an acute need for affordable housing across Gloucester not just in certain parts of the City. For this reason, notwithstanding Policy SC.4 of the Structure

					Plan, it is considered more appropriate to use a city-wide affordable housing requirement.
20.41 Environment Directorate – Gloucestershire County Council	Core Policy 2 – Housing Provision	Object	Reducing the threshold level to 5 dwellings where appropriate would help bring forward more affordable housing. However the issue remains that smaller sites may not be able to generate affordable housing due to financial constraints because of the cost of cleaning up contaminated land.		Agree that reducing the threshold to 5 dwellings is unlikely to be viable.
21.9 Government Office of the South West	Core Policy 2 – Housing Provision	Object	It is not clear here whether the Options take account of the existing shortfall of provision. Given the current annual build rate, may wish to consider interim targets for different periods.		Comment noted. The housing requirement will be based on the Regional Spatial Strategy for the South West. It is understood that the housing requirement set out in the RSS will be subdivided into 5 year blocks.

22.6 Tesco Stores Limited	Core Policy 2 – Housing Provision	Support	Prefer Option D due to the current uncertainty regarding housing numbers.		Support noted.
22.7 Tesco Stores Limited	Core Policy 2 – Housing Provision	Object		Item 4 of this Core Policy should read as follows: 'Are well related to existing shops and services or make appropriate provision as part of the proposed development'.	Agree. Amend text as per suggested wording.
23.3 Westbury Homes (Holdings) Limited	Core Policy 2 – Housing Provision	Object		Amend criterion 2 to read: 'Involve the use of previously developed land and buildings or development of Greenfield land in sustainable locations within the Principle Urban Area'.	Amend text to refer to the release of greenfield land in exceptional circumstances where development needs cannot be met through the release of previously developed land and buildings.

<p>26.1</p> <p>Cheltenham Borough Council</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object</p>	<p>The Regional Spatial Strategy will have significant implications for the Gloucester PUA which will need to be fully addressed within Local Development Documents. Given that the submission deadline for the RSS is now the end of March 2006, the preparation of Development Plan Documents against the background of the emerging RSS cannot be relied upon. The timetable as extended will add uncertainty into the subsequent consultation of issues and alternative options.</p> <p>In the absence of a Structure Plan to 2016, combined with the lack of guidance from the RSS, it is not possible to establish the levels of growth for Gloucestershire and the split between the Cheltenham and Gloucester PUA's.</p> <p>Therefore do not support Option D.</p>		<p>The proposed timetable of the LDF will allow for the Regional Spatial Strategy to be taken into account prior to submission.</p> <p>At this stage, the draft RSS provides a good indication of likely policy content.</p>
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27.3 Mr M White	Core Policy 2 – Housing Provision	Support	Support Option D.		Support noted.
Core Policy 3 – Affordable Housing					
1.10 Robert Hitchins Limited	Core Policy 3 – Affordable Housing	Support	Support Option 3 as it recognises the need to negotiate the level of affordable housing on the most recent affordable housing needs data at the time the planning application is made.		Support noted.
7.14 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 3 – Affordable Housing	Support	Support Option C as this is more flexible, allowing the level of provision to be a matter for negotiation.		Support noted.

8.2 Bidwells Carpenter Planning on behalf of Peregrine Gloucester Limited	Core Policy 3 – Affordable Housing	Support	Support Option A as there is sufficient flexibility to ensure that abnormal costs of development may need to be taken into account which in turn could reduce the affordable housing requirement.		Support noted.
9.6 Gerald Eve representing British Energy Plc	Core Policy 3 – Affordable Housing	Support	<p>The affordable housing policy should be consistent with that which will emerge within the draft RSS, and should not exceed the level that will be stated.</p> <p>The ability to take into account abnormal costs should be taken into account in all cases, or as a minimum, any policy should state the basis upon which costs will be taken into account.</p>		Disagree. The Council's affordable housing requirement should be based on evidence of local housing need, not the content of the Regional Spatial Strategy. No change.
13.15 British Waterways	Core Policy 3 – Affordable Housing	Support	Support Option A as abnormal costs of development may arise as a result of contaminated land where brownfield sites are being re-used.		Support noted.

<p>14.14</p> <p>South West Regional Assembly</p>	<p>Core Policy 3 – Affordable Housing</p>	<p>Support</p>	<p>In recognising the need to deliver more affordable housing, the RPB supports attempts to lower site thresholds and raise percentages of affordable housing sought if these are justified by a robust evidence base and are deliverable in real terms.</p>		<p>Support noted.</p>
<p>18.6</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium</p>	<p>Core Policy 3 – Affordable Housing</p>	<p>Support</p>	<p>Support Option A as it is the most robust of the four Options. The precise site threshold and percentage target should be closely related to the need in the area. It should be clear as to how the thresholds and targets will capture enough housing to meet the needs. The threshold could be lower if it can be demonstrated and justified.</p> <p>Would not recommend a site negotiation target higher than 40% in the interests of viability and the provision of mixed and balanced communities.</p>		<p>Support noted. The importance of providing mixed and balanced communities is acknowledged.</p>

18.7 Tetlow King Planning representing the South West RSL Planning Consortium	Core Policy 3 – Affordable Housing	Support	Support the recognition that targets must be applied flexibly in the light of site circumstances and that on site provision, although preferred, may not always be possible.		Support noted.
21.10 Government Office of the South West	Core Policy 3 – Affordable Housing	Object	The policy needs to be clear about the most recent housing needs evidence to justify the target. It is unclear how a target of 40% works in relation to the net site area as opposed to numbers of dwellings.		Agree that further clarification is required. Insert additional reference to the housing needs survey 2005 for Gloucester and how this has informed the suggested 40% level of provision.
22.8 Tesco Stores Limited	Core Policy 3 – Affordable Housing	Support	Option C preferred.	Abnormal costs should be taken into account under this Option.	Support noted.

27.4 Mr M White	Core Policy 3 – Affordable Housing	Support	Support Option B.		Support noted.
Core Policy 4 – Employment Provision					
1.13 Robert Hitchins Limited	Core Policy 4 – Employment Provision	Support	Support Option C as it is based on achieving a balance between residential and employment uses.		Support noted.
4.4 Peacock and Smith representing WM Morrison Supermarkets PLC	Core Policy 4 – Employment Provision	Support	Option C is the most appropriate and flexible.		Support noted.

<p>5.7</p> <p>Highways Agency</p>	<p>Core Policy 4 – Employment Provision</p>	<p>Support</p>	<p>Support Option C as it affords the greatest certainty about the impact of any traffic that may be generated as a result.</p>	<p>Request information on the net addition of jobs and number of hectares of employment land to be made available in the draft documents so that the other Options may be properly considered.</p>	<p>A more general policy approach has been taken into the preferred option.</p>
<p>6.2</p> <p>RPS Planning representing Costco Wholesale UK Ltd/LXB Properties</p>	<p>Core Policy 4 – Employment Provision</p>	<p>Support</p>	<p>Support setting a target in relation to the number and the quality of jobs to be obtained in the City.</p>	<p>Consider that the document should recognise the employment benefits of some sui generis uses and as such should include the following definition of employment land:</p> <p>‘All buildings and land which are uses or designated for purposes within the Use Class B1 (business), Class B2 (general industrial) and Class B8 (storage and distribution) and closely related issues not falling into a use class – sui generis (such as warehouse clubs, cash and carry businesses, builders merchants, haulage yards, bus garages and MOT testing</p>	<p>Support noted. Disagree with the proposed definition of employment land. Although it is acknowledged that retailing is often an important source of employment it is not considered appropriate to set out a definition of employment land different to that set down in the Use Classes Order.</p>

				stations), but which are commonly found on industrial estates'.	
7.15 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 4 – Employment Land	Support	Support Option A.		Support noted.
8.3 Bidwells Carpenter Planning on behalf of Peregrine Gloucester Limited	Core Policy 4 – Employment Provision	Support	Support Option A as this allows market demand to dictate the amount of employment land that comes forward. Otherwise there is a danger that land that would be suitable for alternative proposals such as mixed-use or housing would be sterilised.		Support noted.
10.9 Planning Perspectives representing SecondSite Property Holdings Limited	Core Policy 4 – Employment Land	Support	Support Option B as it would introduce an employment target based on the net number of jobs to be created rather than the amount of floorspace.		Support noted.

<p>13.16</p> <p>British Waterways</p>	<p>Core Policy 4 – Employment Provision</p>	<p>Support</p>	<p>Support Option A as there is a link between this policy and the proposed Area Action Plan.</p>		<p>Support noted.</p>
<p>14.15</p> <p>South West Regional Assembly</p>	<p>Core Policy 4 – Employment Provision</p>	<p>Support</p>	<p>Direct the Council to the ODPM's Employment Land Review Guidance for appropriate and recent guidance. The Assembly will shortly be receiving a report from Consultants which considers employment land supply and demand which can be supplied. The approach taken to allocation of employment land needs to be firmly embedded in the recognition that employment and housing provision should be brought forward in a balanced way so that any existing imbalances in provision and commuting patterns are not exacerbated.</p>		<p>Comment noted. The importance of balancing employment and housing land is fully acknowledged.</p>

17.13 Tweedale Limited representing I.M. Group Limited	Core Policy 4 – Employment Provision	Support	Support Option A		Support noted.
17.14 Tweedale Limited representing I.M. Group Limited	Core Policy 4 – Employment Provision	Object		Suggest that the supporting text to the policy should make reference to the recent change in guidance at paragraph 42(a) of PPG3, with regard to reuse of redundant industrial or commercial land for residential purposes.	Agree that the supporting text to Core Policy 4 could usefully refer to the updated paragraph 42(a) of PPG3.
20.42 Environment Directorate – Gloucestershire County Council	Core Policy 4 – Employment Land	Object	Numerical targets for employment land are being moved away from – see relevant sections of the Structure Plan Third Alteration EiP Report.		Comment noted. The preferred option does not specify a numerical target for employment land provision.

<p>20.43</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Core Policy 4 – Employment Land</p>	<p>Object</p>	<p>The protection of existing employment land should be included as part of the Core Policy – see Structure Plan Third Alteration Policy SD.20.</p>		<p>Agree that Core Policy 4 should address the issue of employment land provision as well as protection. Amend text accordingly.</p>
<p>20.44</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Core Policy 4 – Employment Land</p>	<p>Support</p>	<p>The Core Policy should encourage employment close to the City Centre to take advantage of the transport links/interchanges and close to the large residential areas (mixed-use developments) to allow walking and cycling as commuting options and to reduce commuting trip distances.</p> <p>City Centre employment will also add to the vitality of the City Centre, especially the lunchtime food sector.</p>		<p>The location of employment land will be dealt with through the Council's site-specific development plan documents.</p> <p>The importance of locating employment uses in sustainable locations including the City Centre is fully recognised.</p>

21.11 Government Office of the South West	Core Policy 4 – Employment Provision	Object	The Option that includes actual job numbers is good but unless it is expressed as FTE (Full-time Equivalent Jobs) it is meaningless. It needs to be clearly linked to the City and Regional Economic Strategies.		This option has not been selected as the preferred option.
22.9 Tesco Stores Limited	Core Policy 4 – Employment Provision	Support	Option A preferred.		Support noted.
27.5 Mr M White	Core Policy 4 – Employment Provision	Support	Support Option A.		Support noted.

Core Policy 5 – Transport and Accessibility					
4.5 Peacock and Smith representing WM Morrison Supermarkets PLC	Core Policy 5 – Transport and Accessibility	Support	Option A is the most appropriate and will provide the greatest flexibility.		Support noted.
5.8 Highways Agency	Core Policy 5 – Transport and Accessibility	Support	Support Option A as this proposes a more detailed approach.		Support noted.
7.16 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 5 – Transport and Accessibility	Object	Do not feel that this issue warrants inclusion as a Core Policy.		Disagree. Ensuring that development reduces the need to travel by car is a key issue for a compact urban area such as Gloucester and as such, is considered to warrant inclusion as a core policy.

7.17 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 5 – Transport and Accessibility	Support	If this was to be included as a Core Policy would support Option B as the alternative is too onerous		Support for Option B noted.
9.8 Gerald Eve representing British Energy Plc	Core Policy 5 – Transport and Accessibility	Support	Support Option B as it would provide flexible yet robust objectives for new development.	Point 5 should make reference to the draft standards within the draft RSS when it is published.	Support noted.
13.17 British Waterways	Core Policy 5 – Transport and Accessibility	Support	Support Option A as this gives much greater clarity by setting out a list of criteria to be met by proposed new developments.		Support noted.
21.12 Government Office of the South West	Core Policy 5 – Transport and Accessibility	Object	Option A, Number 1 – does this mean that an application will be refused for a house extension if there is not a bus stop nearby?		The preferred option takes a more general approach.

<p>22.10</p> <p>Tesco Stores Limited</p>	<p>Core Policy 5 – Transport and Accessibility</p>	<p>Support</p>	<p>Support Option A with the caveat that 'parking is made in accordance with the Council's approved parking standards unless otherwise agreed' (item 3) and that the Core Strategy defines what is meant by 'major development' (item 4).</p>		<p>Support noted. Disagree with suggested wording relating to parking provision. This is considered to be unnecessary. Agree that clarification of major development should be included. Amend text accordingly.</p>
<p>27.6</p> <p>Mr M White</p>	<p>Core Policy 5 – Transport and Accessibility</p>	<p>Support</p>	<p>Support Option A.</p>		<p>Support noted.</p>

Core Policy 6 – Regeneration of the Central Area					
<p>4.6</p> <p>Peacock and Smith representing WM Morrison Supermarkets PLC</p>	<p>Core Policy 6 – Regeneration of the Central Area</p>	<p>Support</p>	<p>Option A is the most appropriate and will provide the greatest flexibility.</p>		<p>Support noted.</p>
<p>5.9</p> <p>Highways Agency</p>	<p>Core Policy 6 – Regeneration of the Central Area</p>	<p>Support</p>	<p>Support Option B as this will resist all new development that is not consistent with and/or would cause harm to the Councils approved Spatial Strategy of the Central Area. This will provide greater control over development in Gloucester than the other Options.</p>		<p>Support noted.</p>

6.3 RPS Planning representing Costco Wholesale UK Ltd/LXB Properties	Core Policy 6 – Regeneration of the Central Area	Support	Support Option A.		Support noted.
7.18 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 6 – Regeneration of the Central Area	Support	Support Option A.	It should make clear that it only refers to new development within the Central Area.	Support noted.
10.10 Planning Perspectives representing SecondSite Property Holdings Limited	Core Policy 6 – Regeneration of the Central Area	Support	Support Option A.		Support noted.

13.18 British Waterways	Core Policy 6 – Regeneration of the Central Area	Support	Support the proactive Option A. Particularly welcome the reference to the waterside areas of the City.		Support noted.
20.45 Environment Directorate – Gloucestershire County Council	Core Policy 6 – Regeneration of the Central Area and Core Policy 7 – City Centre and Retail Development	Object	These two policies could be merged		Core Policy 6 has been deleted.
20.46 Environment Directorate – Gloucestershire County Council	Core Policy 6 – Regeneration of the Central Area and Core Policy 7 – City Centre and Retail Development	Object	It is mentioned earlier in the document (paragraph 2.37) that key regeneration areas were Gloucester Bus Station, Blackfriars and Kings Square – should these schemes be detailed here?		Core Policy 6 has been deleted.

22.11 Tesco Stores Limited	Core Policy 6 – Regeneration of the Central Area	Support	Option A preferred.		Core Policy 6 has been deleted.
27.7 Mr M White	Core Policy 6 – Regeneration of the Central Area	Support	Support Option B.		Core Policy 6 has been deleted.
Core Policy 7 – City Centre and Retail Development					
4.7 Peacock and Smith representing WM Morrison Supermarkets PLC	Core Policy 7 – City Centre and Retail Development	Object		<p>A combination of Options would provide the most appropriate form for this Core Policy. This would provide support for the role of designated centres (existing and new).</p> <p>Would suggest a criteria-based policy against which proposals for new retail development can be considered on unallocated</p>	Comment noted. Agree that the options could usefully be merged. Amend text accordingly.

				sites outside of the designated shopping centre. This would be consistent with the aims and objectives of PPS 6.	
5.10 Highways Agency	Core Policy 7 – City Centre and Retail Development	Support	Support Option C as this permits development only where it is appropriate within the existing Centre and provides the most stringent enforcement around the periphery of the City.		Support noted.
7.19 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 7 – City Centre and Retail Development	Support	Support Option A as this includes reference to the City Centre and District and Local Centres but retaining a suitable level of flexibility.		Support noted.
13.19 British Waterways	Core Policy 7 – City Centre and Retail Development	Support	Support Option A as it encourages a more proactive approach.		Support noted.

22.12 Tesco Stores Limited	Core Policy 7 – City Centre and Retail Development	Object		It is not considered that Options A and B are mutually exclusive. It may be preferable to combine the two Options.	Agree that the options could usefully be merged. Amend text accordingly.
27.8 Mr M White	Core Policy 7 – City Centre and Retail Development	Support	Support Option C.		Support noted.
Core Policy 8 – Mixed-Use Development					
4.8 Peacock and Smith representing WM Morrison Supermarkets PLC	Core Policy 8 – Mixed-use Development	Support	Support Option A. This will be consistent with the aims and objectives of PPS 6.		Support noted.

5.11 Highways Agency	Core Policy 8 – Mixed-use Development	Support	Support Option C as the wording states that mixed-use development will be expected, not just encouraged.		Support noted.
7.20 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 8 – Mixed-use Development	Support	Support Option A as it offers a level of flexibility.		Support noted.
8.4 Bidwells Carpenter Planning on behalf of Peregrine Gloucester Limited	Core Policy 8 – Mixed-use Development	Support	Support Option A as it is broadly framed to allow the case to be made at suitable locations.		Support noted.

9.9 Gerald Eve representing British Energy Plc	Core Policy 8 – Mixed-use Development	Support	Support Option A as it would provide sufficient control and flexibility, encouraging mixed-use developments of compatible uses in appropriate locations.	Option A could be enhanced by noting that the introduction of housing, employment or other uses on certain sites can assist in developing a mix of uses beyond the confines of the immediate site.	Support noted. Agree that additional reference to the benefits of mixed-use development should be included in the supporting text to Core Policy 8. Insert text accordingly.
10.11 Planning Perspectives representing SecondSite Property Holdings Limited	Core Policy 8 – Mixed-use Development	Object	Mixed-use development may not always be appropriate in certain locations, particularly where viability is an issue.		Agree. It is acknowledged that mixed-use development may not be appropriate in certain locations.
13.20 British Waterways	Core Policy 8 – Mixed-use Development	Support	Support Option A as it adopts a proactive approach in relation to mixed-use developments in appropriate locations.		Support noted.

17.15 Tweedale Limited representing I.M. Group Limited	Core Policy 8 – Mixed-use Development	Support	Support Option A as it indicates positive encouragement for mixed-use development in appropriate locations.		Support noted.
22.13 Tesco Stores Limited	Core Policy 8 – Mixed-use Development	Support	Option C preferred.		Support noted.
27.9 Mr M White	Core Policy 8 – Mixed-use Development	Support	Support Option C.		Support noted.

Core Policy 9 – Design and Density					
7.21 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 9 – Design and Density	Object	Object to the requirement of development having to be 'of the highest possible quality' as this goes beyond the remit of reasonable planning policy.	Suggest that 'high quality' would be better wording as it allows an appropriate level of flexibility depending upon other circumstances affecting proposals	Agree in part. Insert reference to development being of a high standard of design.
7.22 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 9 – Design and Density	Support	Support Option A as this is the most sensible approach.		Support noted.
9.10 Gerald Eve representing British Energy Plc	Core Policy 9 – Design and Density	Support	Support Option B as this would provide the opportunity to make the most beneficial use of land. High standards of design do not necessarily have to reflect the scale or appearance of neighbouring		Support noted.

			buildings, which may or may not be of robust character.		
11.5 English Nature	Core Policy 9 – Design and Density	Support	Support the need for new developments to be of the highest possible quality.		Support noted.
11.6 English Nature	Core Policy 9 – Design and Density	Object	Concern if the emphasis on the efficient use of land would lead to the loss of existing green space. The design of new development should seek to create a ‘green network’ of open spaces, linking to existing green space. This has significant benefits for wildlife – species are more likely to survive if they exist in linked rather than isolated populations.		The importance of green spaces is acknowledged. It is not considered however that emphasis on making the most efficient use of land will lead to the loss of green space. These areas will be protected by other policies. No change.
13.21 British Waterways	Core Policy 9 – Design and Density	Support	Support Option A as it takes account of the context and setting for proposed developments, rather than just concentrating on the density.		Support noted.

16.6	English Heritage (South West Region)	Core Policy 9 – Design and Density	Object		This Core Policy could make reference to the Gloucester Characterisation Study and Development Framework carried out by Alan Baxter Associates. This would provide guidance and build upon Option A, whereas B leaves the scope of good design open to conjecture.	Support for Option A noted.
20.47	Environment Directorate – Gloucestershire County Council	Core Policy 9 – Design and Density	Object		Add 'without compromising green open space'.	Disagree. The protection of green open space will be dealt with through other relevant policies.
20.48	Environment Directorate – Gloucestershire County Council	Core Policy 9 – Design and Density	Object		Add reference to TCPA 'Biodiversity by Design'.	Disagree. Cross-referencing to too many different documents is not considered beneficial.

22.14 Tesco Stores Limited	Core Policy 9 – Design and Density	Support	Option B preferred.	It may benefit from a reference to development being of a 'design sympathetic to its surroundings'.	Support noted. Option A does refer to the importance of design respecting the character of the local area.
27.10 Mr M White	Core Policy 9 – Design and Density	Support	Support Option A.		Support noted.
Core Policy 10 – Community Safety					
7.23 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 10 – Community Safety	Object	This policy would be more usefully included in the Development Control Policies document.		Disagree. The higher than average crime rate in Gloucester, which is identified as a key issue in the Core Strategy, warrants the inclusion of community safety as a Core Policy topic.

7.24 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 10 – Community Safety	Support	Support Option A as it allows scope for the consideration of a range of concerns but is not unduly onerous.		Support for Option A noted.
13.22 British Waterways	Core Policy 10 – Community Safety	Support	Support Option A. Consider the wording 'have regard to' is appropriate in this case.		Support noted.
20.49 Environment Directorate – Gloucestershire County Council	Core Policy 10 – Community Safety	Object	Suggest that this is placed in the Development Control Policies document with a cross reference to CABA SPACE 'What are we scared of – the value of risk in designing public space' and also the Gloucester City Council Design guide and Designing Safer Places documents.		Disagree. The higher than average crime rate in Gloucester, which is identified as a key issue in the Core Strategy, warrants the inclusion of community safety as a Core Policy topic. Agree that reference could usefully be made to CABA SPACE and the City Council's own design guidance.

20.50 Environment Directorate – Gloucestershire County Council	Core Policy 10 – Community Safety	Support	Support a policy to plan and design for crime reduction in terms of developments that encourage people to walk and cycle to local facilities rather than putting up barriers to access resulting in less used streets by people and encouraging car use, resulting in deserted streets and more crime.		Support noted. Core Policy 10 links to Core Policy 5 - Transport and Accessibility. No change.
27.11 Mr M White	Core Policy 10 – Community Safety	Support	Support Option C.		Support noted.
Core Policy 11 – Protection of the Built and Natural Environment					
2.6 The Woodland Trust	Core Policy 11 – Protection of the built and natural environment	Support	Support Option A as it opposes development that would harm the natural environment without any caveat.		Support noted.

<p>7.25</p> <p>The Barton Willmore Planning Partnership representing Kayterm Plc</p>	<p>Core Policy 11 – Protection of the Natural and Built Environment</p>	<p>Object</p>	<p>Object to both Options offered. They are too narrow in their interpretation.</p>	<p>Suggest that they should be reworded so as to positively seek the protection of the natural and the built environment. This would then allow a balanced approach to be taken in weighing up the benefits and costs of individual proposals. Suggest the following alternative:</p> <p>‘New development should seek to protect or enhance the City’s built and/or natural environment’.</p>	<p>Agree that this policy could be worded in more positive fashion. Amend text accordingly.</p>
<p>11.7</p> <p>English Nature</p>	<p>Core Policy 11 – Protection of the Built and Natural Environment</p>	<p>Support</p>	<p>Reiterate comments from previous representation.</p>		<p>Support noted.</p>
<p>13.23</p> <p>British Waterways</p>	<p>Core Policy 11 – Protection of the Built and Natural Environment</p>	<p>Support</p>	<p>Support Option A.</p>		<p>Support noted.</p>

<p>13.24</p> <p>British Waterways</p>	<p>Core Policy 11 – Protection of the Built and Natural Environment</p>	<p>Object</p>		<p>Option A should be amended to refer to 'no overall harm' rather than just harm. The key measure is the overall impact of a development. Some harm may be necessary as part of the development, but this can be outweighed by positive benefits elsewhere in the development.</p>	<p>Disagree. The key issue is considered to be whether a development would cause unacceptable harm.</p>
<p>15.14</p> <p>Environment Agency</p>	<p>Core Policy 11 – Protection of the Built and Natural Environment (Paragraph 8.30)</p>	<p>Object</p>		<p>This paragraph explains that the term 'built and natural environment' applies to specific designations and important sites.</p> <p>The Agency considers that it should refer to all environments and not be specific , as any site may be important such as acting as a corridor for certain species.</p>	<p>Agree that this policy should apply to all environments. Paragraph 8.30 lists a number of examples although this is not exhaustive.</p>

15.15 Environment Agency	Core Policy 11 – Protection of the Built and Natural Environment (Paragraph 8.30)	Object		This paragraph refers specifically to the River Severn floodplain and not those associated with other watercourses in Gloucester. This should be amended to include all floodplains.	Agree that reference should be made to all watercourses not just the River Severn.
15.16 Environment Agency	Core Policy 11 – Protection of the Built and Natural Environment	Support	Support Option B as, in accordance with PPS 1 it not only refers to the protection of the environment but also its enhancement. This will help to ensure that the environmental footprint of any development is minimised.		Support noted.
15.17 Environment Agency	Core Policy 11 – Protection of the Built and Natural Environment	Object		Option A should be amended to strengthen the policy and avoid any ambiguity. The word 'or' should be removed as the two environments are not mutually exclusive, all built environments contain an element of nature.	Agree that the word 'or' should be deleted from Option A to provide greater certainty.

<p>16.7</p> <p>English Heritage (South West Region)</p>	<p>Core Policy 11 – Protection of the Built and Natural Environment</p>	<p>Support</p>	<p>Core Policy 11, Option B is broadly supported.</p>		<p>Support noted.</p>
<p>19.6</p> <p>Boyer Planning representing the Trustees of Winnycroft Farm and Associated Parties</p>	<p>Core Policy 11 – Protection of the Built and Natural Environment</p>	<p>Object</p>	<p>This policy groups together a number of different designations and treats them all equally as absolute constraints on new development. This is fundamentally flawed – the six designations listed vary considerably in terms of their importance.</p> <p>It is wholly inappropriate for the Core Strategy to treat them as if they are of equal importance.</p>		<p>The Council's development control policy document will set out the specific approach that will be taken to the protection of specific designations. Core Policy 11 is intended to set out a broad commitment to the protection of the built and natural environments. No change.</p>

<p>19.7</p> <p>Boyer Planning representing the Trustees of Winnycroft Farm and Associated Parties</p>	<p>Core Policy 11 – Protection of the Built and Natural Environment</p>	<p>Object</p>	<p>The Landscape Conservation Areas (LCA's) within the current local plan represent the lowest level of constraint within this hierarchy. PPS 7 (paragraph 25) makes it clear that local landscape designations should only be maintained where there are special circumstances such that criteria-based planning policies cannot provide the necessary protection. It is incumbent on the Council through the LDF to re-evaluate current LCA's with the policy guidance.</p>		<p>Views on the extent of Landscape Conservation Areas will be sought through the Council's Site Allocations & Designations (Non-Central Area) document. It is acknowledged that such local designations should only be maintained where there is good reason.</p>
<p>20.51</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Core Policy 11 – Protection of the Natural and Built Environment</p>	<p>Object</p>		<p>This should be expanded to 'Protection and <u>enhancement</u> of the Natural and Built Environment'. This is in accordance with PPS 1 (paragraphs 17 and 18). There is also a link here with creating Green Infrastructure (see comments from Spatial Strategy).</p>	<p>Agree that this policy should be expanded to include the protection and enhancement of the built and natural environment in accordance with PPS1.</p> <p>Insert reference to green infrastructure.</p>

22.15 Tesco Stores Limited	Core Policy 11 – Protection of the Built and Natural Environment	Support	Option B preferred.		Support noted.
27.12 Mr M White	Core Policy 11 – Protection of the Built and Natural Environment	Support	Support Option B.		Support noted.
Core Policy 12 – Community Provision					
7.26 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 12 – Community Provision	Object	This issue does not warrant inclusion as a Core Policy.		Disagree. The issue of community provision is a key issue which is considered to warrant inclusion as a Core Policy.

7.27 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 12 – Community Provision	Support	If this was to be included as a Core Policy would support Option B as this is clearer than Option A.		Support for Option B noted.
20.52 Environment Directorate – Gloucestershire County Council	Core Policy 12 – Community Provision and Core Policy 13 – Access to Shops and Services	Object	These policies could be merged.		Core Policy 13 has been deleted.
22.16 Tesco Stores Limited	Core Policy 12 – Community Provision	Support	Option B preferred.		Support noted.
27.13 Mr M White	Core Policy 12 – Community Provision	Support	Support Option B		Support noted.

Core Policy 13 – Access to Shops and Services					
7.28 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 13 – Access to Shops and Services	Object	This issue does not warrant inclusion as a Core Policy.		Agree. This policy has been deleted.
21.13 Government Office of the South West	Core Policy 13 – Access to Shops and Services	Object	Is this a duplication of the Transport and Accessibility Core Policy?		Agree. This policy has been deleted.

Core Policy 14 – Sport and Recreation						
2.7 The Woodland Trust	Core Policy 14 – Sport and Recreation	Support	Support Option A as it specifies that appropriate open space provision should be a condition of major developments.	Would like to see the specific mention of woodland creation as an open space option.		Support noted.
7.29 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 14 – Sport and Recreation	Object	Object to Option A.			Objection noted.
7.30 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 14 – Sport and Recreation	Support	Support Option D as it offers the clearest advice in respect of the Council's general approach towards new and existing sports and recreation facilities.	This policy should be clearly defined so as to apply only to public open space and playing pitches/fields.		Support for Option D noted. It is considered appropriate for the policy to include private open space as this may be capable of being used by the public.

<p>9.11</p> <p>Gerald Eve representing British Energy Plc</p>	<p>Core Policy 14 – Sport and Recreation</p>	<p>Support</p>	<p>Support Option A as it provides both clarity and certainty.</p>		<p>Support noted.</p>
<p>20.53</p> <p>Environment Directorate – Gloucestershire County Council</p>	<p>Core Policy 14 – Sport and Recreation</p>	<p>Support</p>	<p>Recreation should also include walking and the enjoyment of the natural environment (which can include public open space), which benefits the health and wellbeing of people. This policy therefore has strong links with Core Policy 10 and the creation of a Green Infrastructure Network. Also related to Core Policy 2 and the release of Greenfield sites.</p>		<p>Support noted.</p>

Core Policy 15 – Culture and Tourism						
7.31 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 15 – Culture and Tourism	Object	Object to this being included as a Core Policy as it would be better dealt with in other LDF documents.			Agree. This policy has been deleted.
7.32 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 15 – Culture and Tourism	Object			If this issue was to be included in the Core Strategy then it is imperative that the term ‘new cultural and/or tourist facilities’ are clearly defined. Concerned that the policy could become onerous if it were to be more broadly applied to developments and uses that should not be so strictly controlled.	This policy has been deleted.

13.25 British Waterways	Core Policy 15 – Culture and Tourism	Support	Support Option A as it suggests a more proactive approach.		This policy has been deleted.
21.14 Government Office of the South West	Core Policy 15 – Culture and Tourism	Object	It is not clear what is meant by cultural facilities – it would be helpful for an explanation or definition of the term.		This policy has been deleted.
Core Policy 16 – Developer Contributions					
1.8 Robert Hitchins Limited	Core Policy 16 – Developer Contributions	Support	Support Option C	Should include that the nature of any provision or contribution will be a matter for negotiation on a site-by-site basis.	Support for Option C noted. Agree that reference could usefully be made to the level of provision being a matter for negotiation as per Option B.

4.9 Peacock and Smith representing WM Morrison Supermarkets PLC	Core Policy 16 – Developer Contributions	Support	Support Option C. This will be the most appropriate and will ensure that developer contributions are reasonably related to the development proposed.		Support noted.
5.12 Highways Agency	Core Policy 16 – Developer Contributions	Support	Support Option B as it enforces developer contributions towards the provision of infrastructure on a site-by-site basis through negotiation.	Would welcome the inclusion of a statement detailing that developers will be required to contribute towards mitigation measures with respect to any adverse impacts created on the Trunk Road Network.	Support noted.
7.33 The Barton Willmore Planning Partnership representing Kayterm Plc	Core Policy 16 – Developer Contributions	Support	Support Option B as it provides flexibility through negotiation on a site-by-site basis.		Support noted.

9.12 Gerald Eve representing British Energy Plc	Core Policy 16 - Developer Contributions	Support	Support Option A as it is considered to be the most concise Option.	It could benefit from stating that contributions should be directly related to the development proposals.	Support noted.
10.12 Planning Perspectives representing SecondSite Property Holdings Limited	Core Policy 16 – Developer Contributions	Support	Support Option B		Support noted.
10.13 Planning Perspectives representing SecondSite Property Holdings Limited	Core Policy 16 – Developer Contributions	Object	The intended policy should not be unduly prescriptive and explain that the level of developer contributions sought will be a matter for negotiation.		Option B specifies that the nature of any provision or contribution will be a matter for negotiation on a site-by- site basis.

<p>11.8</p> <p>English Nature</p>	<p>Core Policy 16 – Developer Contributions</p>	<p>Object</p>		<p>It should make clear in the wording of this policy that developers will be expected to make reasonable contributions to the maintenance or enhancement of biodiversity (otherwise it is difficult to see how Objective 3 will be achieved).</p>	<p>The nature of any contribution will be a matter for negotiation. Where there are biodiversity interests to take into account, consideration will be given to the provision of appropriate contributions. It is not however considered appropriate to make specific reference to biodiversity within Core Policy 16.</p>
<p>13.26</p> <p>British Waterways</p>	<p>Core Policy 16 – Developer Contributions</p>	<p>Support</p>	<p>Support Option B as negotiation would be on a site-by-site basis</p>		<p>Support noted.</p>

13.27 British Waterways	Core Policy 16 – Developer Contributions	Object		The text does not appear to recognise potential changes in the S106 regime, including the introduction of possible tariffs. The issue of unilateral undertakings by developers could also be covered in the text.	Potential changes in the S106 regime are still under review and appear some way off being formally introduced. Any change will be incorporated into a revised Core Strategy at a later date.
17.16 Tweedale Limited representing I.M. Group Limited	Core Policy 16 – Developer Contributions	Support	Support Option B as it acknowledges that the City Council will seek to negotiate with developers on a site-by-site basis in accordance with the provisions of Circular 1/97.		Support noted.
20.54 Environment Directorate – Gloucestershire County Council	Core Policy 16 – Developer Contributions	Support	Although each case is different, guidance should be given for the benefit of both DC officers and developers on what contributions are likely to be sought for a particular type and size of development. Examples provided.		Disagree. The policy as worded allows for an appropriate degree of flexibility with contributions and provision being determined on a site-by-site basis through

					negotiation. It is not considered appropriate to be more prescriptive than this. The circumstances for each site may vary considerably. No change.
22.17 Tesco Stores Limited	Core Policy 16 – Developer Contributions	Support	Option B preferred.		Support noted.
Monitoring and Implementation					
7.34 The Barton Willmore Planning Partnership representing Kayterm Plc	Monitoring and Implementation	Support	Support the ongoing monitoring of the LDF, including assessing that policies are delivering the anticipated outcomes.		Support noted.

Key Diagram					
<p>1.9</p> <p>Robert Hitchins Limited</p>	<p>Key Diagram</p>	<p>Object</p>		<p>Gloucester City's administrative boundaries should be shown on Appendix 3 – Key Diagram.</p>	<p>Agree. Amend Key Diagram to identify the boundaries of the Gloucester City administrative area.</p>