

CHAPTER 1 - Introduction

Ref No	Pol No	Para No	Issue	Representation	Changes Seeking	Officers	Recommendation
204		1.1	1 Local Plan Period	The local plan period up to 2011 is understood, however, given that the new Deposit Draft Structure Plan is to be published shortly it would appear to be the common sense approach for the second stage Deposit Local Plan to cover the same time period up to 2016 which would be in accordance with paragraph 6.8 of PPG12. Suggest that the housing figures in the second Deposit Local Plan be prepared in accordance with new housing figures set out in the Draft Structure Plan and RPG.	The local period should be extended to 2016. The housing figures should be reviewed on the basis of the policies set out in the new RPG and draft deposit Structure Plan.	While the city will undoubtedly continue as a focus for new development in the period beyond 2011, the Review of the Structure Plan has not yet reached the draft stage. PPG12 Para 6.8 also encourages Local Plans to follow the Structure Plan end date which is 2011. Deciding appropriate allocations for this future period would be speculative and at this stage the extent of success in urban regeneration and intensification is difficult to predict. A longer plan period would bring pressure for greenfield peripheral allocations which would raise expectations and could pre-empt decisions about appropriate uses in the future. The County Council support the end date of 2011 for the Plan.	No change.
131		Introduction1	Proposals Map - city boundary incorrectly drawn	Plan area boundary at Over Bridge is incorrectly drawn.	Re-draw boundary.	Agree	Amend boundary accordingly
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Ref No	Pol No	Para No	Issue	Representation	Changes Seeking	Officers	Recommendation
163		1.2	1 The role and purpose of the plan	No mention that the Plan will provide guidance on development form.	Include statement to this effect.	This is in part covered by bullet point one in paragraph 1.2. Bullet point two would be clearer if reference was made to identifying land allocations also in the context of regional and national policy.	Add appropriate text to bullet point two.
139		1.5, 1.6	1 National and Strategic Context	The reference to the national, regional and strategic context within the Plan has been prepared is inadequate and in particular reference to PPGs, RPG and the Adopted Structure Plan. There is scant reference to the PPG3 sequential approach and the role of Gloucester as a focus for development as a principal urban area at the heart of the central severn vale and the potential role of urban extensions to Gloucester as a sustainable solution accommdating development.	Include further justification in the Strategy in relation to national and strategic framework.	The Introduction is brief in the inerests of producing a concise Plan. Adequate detail is included in the Strategy Chapter to explain the aims of urban renaissance. It is sensible to avoid reference to urban extensions since there is a clear priority within national guidance for development within urban areas. In addition, given the detailed Gloucester context, urban extensions other than part of RAF Quedgeley are unlikely to be needed in the plan period to 2011.	No change.

Ref No	Pol No	Para No	Issue	Representation	Changes Seeking	Officers	Recommendation
167		1.12	1 Table 1. The Timetable for the Main Stages of the Local Plan	The table represents an optimistic view of the likely timetable for the Local Plan process. Experience suggests that much more time will need to be allowed between the first and second deposit stages and four months between the second stage and Local Plan Inquiry is unrealistic.	Inclusion of a revised Table 1.	There has been some slippage in getting the Local Plan to the second deposit stage due to the RAF Quedgeley Inquiry. It is now proposed to allow six months between this stage and the Inquiry. It is expected that the Inspectors Report may still be available in accordance with the original timescale. The table should be updated.	Up-date Table 1.
163		1.20	1 Supplementary Planning Guidance	No reference to planning obligations and if these were made it would assist in preparing Development Briefs.	Include paragraph specifying that community, education, highway, libraries, social services, fire and rescue etc. elements may be sought by way of planning obligations and S.106 agreements involving Gloucestershire County Council.	The role of planning obligations is adequately covered in the Implementation section of the Strategy (Para 2.37). The aim is for a concise Plan and the proposed change is too detailed. Support noted.	No change.
100		1.20, 1.21, 1.22	3 Supplementary Planning Guidance	Support the simultaneous release of Supplementary Planning Guidance with the First Deposit Local Plan.			No change.
163		1.22	1 Supplementary Planning Guidance	No reference to planning obligations and if these were made it would assist in preparing Development Briefs.	Include paragraph specifying that community, education, highway, libraries, social services, fire and rescue etc. elements may be sought by way of planning obligations and S.106 agreements involving Gloucestershire County Council.	The role of planning obligations is adequately covered in the Implementation section of the Strategy (Para 2.37). The aim is for a concise Plan and the proposed change is too detailed.	No change.

CHAPTER 2 - Strategy

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		(2.1 - 2.12)	1	Strategy - no reference to economic viability in assessing regeneration	No reference is made to the economic viability in assessing where to build and how to regenerate.	Include additional bullet point specifying that the viability of development and redevelopment schemes may be taken into account in determining development timing.	Further work on viability/availability has now been undertaken in the Urban Capacity Study, and this is taken into account in the revision of the housing strategy (see changes to the Key Development Proposals section from Paragraph 2.25 and the Housing Chapter). The need for viability in regeneration schemes is already acknowledged in the Plan by the location of allocations for high value uses in the Western Waterfront, as referred to in Paragraph 2.30.	No change.
66		(2.1 - 2.43)	1	Strategy Timescale.	Alter strategy so that it fits 250 year masterplan.	None given,	The Local Plan must follow the Structure Plan which sets the strategy to 2011. National guidance reflects that longer term planning is too uncertain.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		(2.2)	1	A Period of Opportunity	<p>The paragraph provides an inaccurate account of the City's recent history and implies that redevelopment of the Dockland area has been deliberately ignored. It is important to distinguish between the edge of the city as a built up area and the city's administrative boundaries. It is fundamentally incorrect to imply that the significant opportunities for the re-use of land in the city centre have been available throughout the 80s & 90s and the suburban development has occurred despite of the availability of this potential area for regeneration. Using PPG3, this land was not and currently still is not "available" for redevelopment for a whole range of reasons.</p> <p>The primary problem is the lack of infrastructure in the form of the SRR/SWBP. The second problem is that the land around the</p>	Paragraph to be revised.	Disagree. Various sites are available and significant progress is now being made coinciding with a reduction of greenfield opportunities available.(See revisions to housing chapter).	No change.

Docks has previously
been used for
employment purposes
and much of it
continues in relatively
low intensity
commercial uses. Their

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					<p>existence precludes viable proposals for redevelopment as do the extraordinary costs associated with development in a commercial area adjoining the Docks. Other problems include contamination and difficulties associated with the floodplain. Many of these factors affect sites in the WW and limit the amount of "available" previously developed land.</p>			

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139		(2.4)	1	A Period of Opportunity	This paragraph contains emotive language particularly in relation to development proposals in Stroud District. The Hunts Grove allocation is considered to represent an urban expansion rather than urban sprawl. It is being promoted in line with the Adopted Structure Plan to concentrate its development in the Central Severn Vale.	Redraft paragraph to remove emotive language.	Disagree. Stroud Local Plan is not in conformity with the Structure Plan due to the Hunts Grove proposal. Hunts Grove should be assessed as an option alongside others in the Structure Plan Review.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
201		(2.4)	1	A Period of Opportunity	<p>It fails to set out the development opportunities available within Gloucester in the current strategic context; that context relates to the adopted Structure Plan which gives clear locational guidance for development both in and adjacent to Gloucester during the Plan period; it fails to acknowledge that allocations made in adjoining Local Plan areas can comply with that guidance; it is inappropriate to suggest such allocations constitute "an unrestricted flow of development" or "urban sprawl"; the strategic context for development was settled through the Structure Plan process and the City Council is making use of the current Local Plan to "argue" against the principles in adopted Structure Plan; the argument includes assertions that locations in the Green</p>	None given.	<p>Concern at the impact of Hunts Grove on Gloucester is shared by the County Planning Authority. If the development of any greenfield land on the periphery of Gloucester is not properly phased then it would be unrestricted and undermine the sequential approach. This paragraph represents the Council's strategic view.</p>	No change.

Belt are the "most sustainable" which have not been tested and cannot be tested through the current local plan process - they were tested

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164		(2.4)	1	A Period of Opportunity	through the Structure Plan process and found wanting; this paragraph does not address matters relevant to land use considerations which apply within the plan area and the plan period. While urban sprawl should be discouraged and development directed to sustainable locations, the Plan should in the first instance emphasise making best use of the existing urban area rather than advocating development within the Green Belt.	Amend text.	Agreed.	Amend the text of Paragraph 2.4 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139		(2.4)	1	A Period of Opportunity	Objects to the reference that the Green Belt is extended to envelop the City as this may relate to land within Stroud District, and should be the subject of proper analysis at a County level with the interested authorities which has yet to be undertaken.	Reword the final sentence of 2.4 to acknowledge need for Green Belt Review to be based on thorough analysis.	This paragraph represents the City's strategic view. Precise boundaries will need considering when the Green Belt is reviewed, but the need for a review is now recognised in Regional Guidance.	No change.
167		(2.4)	3	A Period of Opportunity	Endorses the City Council's intentions and shares its concerns about the likely effect on the City of a major residential development at Hunts Grove. The release of Hunts Grove will adversely effect the ability of housebuilders to remediate and redevelop RAF Quedgeley and is likely to cause the City Council to fail to meet the housing requirements of H2 of the Structure Plan.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164		(2.9, 2.10, 2.11, 2.12)	1	Aims and objectives of the Plan	The Plan would benefit from a more focused and clearer statement of its main aims, objectives and targets, and the strategy for achieving them. Although each chapter has a section on monitoring it is not clear how these indicators will inform the process of monitoring both the implementation and effectiveness of policies, and their subsequent review.	Amend and add text.	Further discussion with GOSW has led to agreement that this comment would be met by a clearer introduction to each topic chapter with monitoring indicators clearly related to objectives.	Amend where appropriate the Introduction and Monitoring sections in each topic chapter. Give more explanation of how monitoring will inform the Review process in the Introduction Paragraph 1.23.
167		(2.9)	3	Aims of the Plan	Welcomes the recognition by the City Council that many agencies may need to be involved in the regeneration of Gloucester.		Support noted.	No change.
139		(2.9)	3		Welcome acknowledgement of the value and need to work in partnership in provision of city's services. Would welcome this approach in relation to Hunts Grove and the wider Quedgeley area.		Support noted, but the Hunts Grove scheme is fundamentally opposed by the City Council.	

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66		(2.10)	1	The Aims of the Plan	Indiscriminate use of brownfield sites preventing long term future infrastructure.	Reallocation of brownfield site land usage.	The Plan can only take account of the infrastructure planned through the approved Structure Plan.	No change.
10			1	The Vision Statement after paragraph 2.10	The Vision omits reference to a healthy and safe city.	That the Vision be amended so it reads: 'To create a city that looks good and feel good and is healthy and safe to live in'.	The city would not "feel good" if it was not a safe and healthy place. The Vision statement should be kept short and memorable.	No change.
100		(2.11)	1	Aims of the Plan	Disappointed that there is no reference to affordable housing in the overall strategy, therefore it fails to give this important issue the weight and status it deserves.	None given	Agreed.	Add a new bullet point to the list in Paragraph 2.11.
163		(2.11)	1	The Aims of the Plan - no reference to easy access	The detail concerning the vision should include "ensuring that all have easy access, by their chosen mode of travel and encourage reduction in the reliance of private car use for short journeys". No reference to planning obligations and their role.	Add "ensuring that all have easy access, by their chosen mode of travel and encourage reduction in the reliance of private car use for short journeys" to the list of bullet points. Include a bullet point stating that planning obligations to provide appropriate levels are relevant and related infrastructure may be sought from developments.	Disagree. The access point is adequately covered in bullet point 8 of paragraph 2.11. The obligations point is covered in the Implementation Section starting at paragraph 2.37.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		(2.11)	1	The Aims of the Plan	The 16 bullet points are laudable objectives but there is little recognition of the problems associated with achieving some or even all of these objectives e.g. the 5 point which encourages waterside apartment contains little market research. Significant environmental improvements to the Central Area is needed if they are to become attractive environments to live in which is one of the reasons why demand for new accommodation is often focused in suburban locations at present.	Revisions to address the question of how these objectives can be achieved.	Implementation of the Friday Metford conversion, and other emerging schemes, show that waterside apartment development is viable. This is backed by the market view of Chesterton (see Housing Chapter). The Implementation Section starting at paragraph 2.37 explains in sufficient detail how the objectives will be achieved.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	ST.1		1	Sustainable Development	Supports principle of promoting sustainable development although the wording does not properly reflect the accepted definition of meeting the needs of the present without compromising the ability of future generations to meet their own needs.	None given.	The Bruntland definition is included at Paragraph 2.5. This policy seeks to reflect the real world where arguably no development is truly sustainable in a strict sense. The policy refers to the important principle of the linkage between social, economic and environmental concerns and reflects the new duty on Local Authorities to look after the social, economic and environmental well-being of their areas.	No change.
66	ST.1		1	Sustainable Development	The policy is too short term.	A 250 year masterplan is needed.	The Local Plan must follow the Structure Plan which sets the strategy to 2011. National guidance reflects that longer term planning is too uncertain.	No change.
139		(2.13)	1	Description of the City.	It does not present a full picture in relation to Gloucester and its environs. There is no mention of the situation to the south and south west of the City and that there is a substantial area of mixed use development in these locations.	Redraft paragraph to reflect the situation around Gloucester generally.	Agree in part. This paragraph ought to refer to the RAF Quedgeley site and Waterwells Business Park.	Amend paragraph 2.13 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	ST.2		1	Priority for Developing Previously Used Sites	Supports the principle of developing previously developed sites before greenfield, however the policy and supporting text should acknowledge the need for a realistic approach to be adopted, eg commercial viability and deliverability in a reasonable time frame. Also question how a suitable location will be quantified.	Reword policy and text to acknowledge potential problems in bringing forward PDL sites rather than greenfield ones within a reasonable timeframe to meet the Plan's requirements.	Agree that the policy should be clarified by including reference to viability and availability of brownfield sites. Suitable locations will be judged against other policies in the Plan and will depend on the use being proposed.	Amend policy wording to refer to viability and availability of brownfield land.
201	ST.2		1	Priority for Developing Previously Used Sites	Support the objective offering priority to the development of previously developed sites, however, objects to the approach adopted within the policy wording as it does not accord with the best practice guidance in "Planning To Deliver".	None given.	The policy should be amended to refer to the viability and availability of brownfield land to more closely accord with national guidance.	Amend Policy ST.2 to refer to viability and availability of brownfield land.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	ST.2		1	Priority for Developing Previously Used Sites	Policy fails to reflect national planning guidelines and it is not the existence of previously developed land it is the availability of suitably located previously used land which is material to such an approach.	Rephrase policy to read "The development of greenfield land will not be supported where previously used land of a suitable size and location "is available" to accommodate the development needed.	Agree that the policy should be amended to refer to the availability of brownfield sites	Amend Policy ST.2 to refer to availability of brownfield land.
149	ST.2		1	Priority for Developing Previously Used Sites	Policy does not acknowledge the fundamental problems of viability that may blight a sites development. The presumption that brownfields will come first can be regulated by phasing, guided by completions, which allows greenfield to be started at the same time ensuring a continuous and equitable supply.	Amend the policy.	Further work on viability has been undertaken in up-dating the Urban Capacity Study and additional brownfield sites have been included in the Plan. The principle of this policy is still valid, although it is accepted that the policy needs clarifying by including reference to availability and viability of brownfield sites.	Amend policy wording to refer to viability and availability of brownfield land.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	ST.2		1	Priority for Developing Previously Used Sites	Welcome objective of the policy. However the policy is unclear if the Council would support development at a previously developed site in the countryside before a greenfield location within or on the edge of the built up area. Amend policy to accord with PPG3 and PPG6.	Policy to be amended to clarify Council's priorities for the location of development within the context of the search sequence approach.	The policy only supports developing previously used sites "in suitable locations" and this would be determined under other policies in the Plan. Suitable locations will depend in part on the use proposed, and it is conceivable that, in the absence of a suitably located brownfield site within the urban area, a greenfield site within the built-up area could be preferable to a brownfield site beyond the urban edge.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
197	ST.2		1	Priority for Developing Previously Used Sites	Supports the principle of the two policies (ST2 and ST3) but is concerned that there is an assumption made that greenfield sites are of a higher biodiversity value than brownfield sites which is not always the case. Many greenfield sites are intensively managed whereas previously used sites may be derelict and have a high conservation value. The supporting text should also make reference to PPG3 Annex C which defines 'previously developed land'.	The Policy and supporting text should recognize the potential conservation value of brownfield sites.	Within the Plan brownfield land is defined in accordance with the PPG3 definition (see Plan Glossary). It is agreed that some brownfield sites have environmental value and this should be reflected by re-titling Policy ST.3 and amending it to refer to all land. The Policy also needs to be amended to reflect that the value of open land will vary.	Amend Policy ST.3 to relate to all open land, and to ensure the level of protection can vary according to the value.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	ST.2		1	Priority for Developing Previously Used Sites	<p>Support generally but the preference for re-using land should not outweigh the other aims of the Plan, and specifically the need to provide housing choice.</p> <p>A range of brownfield and greenfield sites should be brought forward since this is what the residential market in Gloucester will continue to require.</p> <p>A comprehensive urban housing study should be undertaken looking at constraints and market demand. PPG3 supports urban extensions, and deciding how much development should take place beyond the urban area will depend on the capacity to accommodate housing within. However, an element of greenfield will be required.</p>	None given.	<p>While it is agreed that there is a need for choice the aim of national guidance is to re-configure the market and PPG3 Para 30 clearly supports brownfield first which is the principle of this policy. The Plan includes a range of brownfield opportunities in a variety of locations and the Plan includes some greenfield land at RAF Quedgeley in addition to existing greenfield commitments (see new Plan Appendix 6). More brownfield opportunities and a greater level of potential over-supply is now built into the Plan following the up-date of the Urban Capacity Study.</p>	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	ST.2		1	Priority for Developing Previously Used Sites	The emphasis on previously developed land is welcomed although it is acknowledged that a limited amount of greenfield land may be released over the Plan period.	None specified.	Comment noted.	No change.
167	ST.2		1	Priority for Developing Previously Used Sites	Objects as the policy is inconsistent with the advice set out in PPG3 (paras 29-34).	Deletion of policy or revision consistent with Government advice.	The policy needs to include reference to the viability and availability of brownfield sites to be fully consistent with national guidance.	Amend policy to refer to viability and availability of brownfield land.
66	ST.2		1	Priority for Developing Previously Used Sites	Indiscriminate use of brownfield sites preventing long term future infrastructure.	Alteration of planning permission for many brownfield some greenfield that have been committed to housing and employment.	The Plan can only take account of the infrastructure planned through the approved Structure Plan. Removing planning permissions would in any event be incredibly expensive and not viable.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	ST.2		1	Priority for Developing Previously Used Sites	The City's preference to previously developed sites is supported, however the use of a single test based "suitable size and location" is not in accordance with the 'search sequence' and criteria for assessing sites as set out in paragraphs 30 & 31 of PPG3.	Policy should be amended to incorporate tests set out in paragraph 31 of PPG3.	Agree in part. The policy should be amended to refer to the viability and availability of brownfield land to more closely accord with national guidance.	Amend Policy ST.2 to refer to viability and availability of brownfield land.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
148	ST.2	(2.16)	1	Priority for Developing Previously Used Sites	<p>Many of the sites in the central area identified in the Urban Capacity Study are or were employment sites. Although allocated for mixed use development their loss to employment will impact upon the ability of the Plan to meet the Structure Plan requirement. While the jobs may be replaced, in the longer term the potential of the central area to continue to provide for employment will be compromised by giving priority to housing on these sites over greenfield. A balance of land uses across the town is more appropriate and in the central area this requires safeguarding land for other uses.</p>	<p>Re-draft to acknowledge the need to ensure a sustainable pattern of land use across the city and address the shortfall in employment land, and also that there may be occasions where releasing greenfield land for residential may be more sustainable than using urban employment land for mixed use even if this meets a short term imperative of maximising brownfield development.</p>	<p>The policy is not use specific, and the Urban Capacity exercise is not just aimed at finding land for housing as the allocations for employment on some brownfield land in the Plan demonstrates. Although a mix of employment and housing across the city may be sustainable the reality is that the pressure for employment development is greatest at sites such as Waterwells Business Park and there is very little employment activity in central locations. Although Chesterton in their Employment Study identified potential in the Western Waterfront area, the need to produce viable mixed use schemes is unlikely to be achieved with a significant requirement for employment land to be reserved. Such a policy could undermine regeneration efforts and would bring greater pressure to release greenfield land for housing contrary to national policy.</p>	<p>No change.</p>

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
100	ST.2		1	Priority for Developing Previously Used Sites	The sequential brownfield approach is noted however this can limit the scope of effective implementation of affordable housing. Considers that the wording of this policy overlooks the practicalities of delivering affordable housing within the constraints of the funding regime RSLs have to operate in.	It should be made clear that sites on which 100% affordable housing is proposed may be regarded as a legitimate exception.	Government guidance does not suggest that the provision of affordable housing on greenfield sites should be an exception to the sequential approach except for rural "exception sites" which are not applicable in the Gloucester City area.	No change.
122	ST.2		1	Priority for Developing Previously Used Sites	Objects to the policy as it pays no regard to the suitability and availability of sites. It appears to seek to obstruct greenfield development irrespective of the availability of brownfield sites. The policy approach of prioritising the size, location of brownfield sites over the availability, suitability deliverability and viability of sites is contrary to Government guidance.	Delete policy.	Agree that the policy should be clarified by including reference to viability and availability of brownfield sites.	Amend policy wording to refer to viability and availability of brownfield land.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
226	ST.2		1	Priority for Developing Previously Used Sites	Has concerns that about the concentration of development on 'brownfield' as it can be misleading and does not draw attention to those categories of land laid out in Annex C of PPG3 which are considered to have developed sufficient of their own wildlife interest to merit protection in their own right. Similarly much 'greenfield' land is intensive farmland with almost no wildlife interest.	These policies should recognize the established value of some 'brownfield' sites.	In the Plan "brownfield" is defined in accordance with PPG3 Annex C (see Glossary). Where appropriate brownfield sites with nature conservation value have been designated (see Proposals Map and Policies B1-B3). However, this protection for valuable brownfield land is not currently properly reflected in the strategy policies and can be achieved by re-titling Policy ST.3 and amending it to apply to all open land with value.	Amend Policy ST.3.
143	ST.2		3	Priority for Developing Previously Used Sites	Supports the Local Plan as it restricts future development to sites which are at least partly 'brownfield land'. It is important that all greenfield sites should be retained as such and not developed.		Support noted.	No change.
9	ST.2		3	Priority for Developing Previously Used Sites	Derelict areas should be recycled into new living quarters.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
28	ST.2		3	Priority for Developing Previously Used Sites	Previously used sites need rejuvenation. Their development would make the city more attractive and safeguard green field sites elsewhere.		Support noted.	No change.
141	ST.2		3	Priority for Developing Previously Used Sites	Support the policies on greenfield land and reducing travel by car.		Support noted.	No change.
203	ST.3		1	Safeguarding Greenfield Land	Plan should seek to ensure that any land (not just greenfield) with nature conservation, landscape or recreational value is given protection appropriate to its interest or value. With the exception of Green Belt, 'exceptional circumstances' are not required before such land is developed. In other words the policy as phrased fails to properly differentiate between the levels of protection to be afforded to certain designations.	Delete policy.	Agree that the term "exceptional circumstances" could be misconstrued and should be replaced with the term "special circumstances". Amending the title of the policy and its wording to apply to all land with value is also justified. It is agreed that for nature and recreational use that the value can vary, and protection needs to be appropriate to the lands value given the approach of detailed policies in the Plan.	Retain Policy ST.3 but amend title and wording accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	ST.3		1	Safeguarding Greenfield Land	Objects in so far as it affects land at former RAF Quedgeley. Areas within the RAF site which might be recognised as having nature, landscape or recreation value can be adequately protected by condition, legal agreement and/or good design. Policy wording is inconsistent with PPG3 in respect of the circumstances where greenfield land should be protected.	Revision of the policy.	This policy relates to land with identified value and is protected for reasons given in other national guidance than PPG3. Areas with value in the RAF Quedgeley site have been identified on the Proposals Map. The policy is consistent with the aims of PPG3 to produce high quality residential environments.	No change.
66	ST.3		1	Safeguarding Greenfield Land	Indiscriminate use of brownfield sites preventing long term future infrastructure.	Alteration of planning permission for many brownfield some greenfield that have been committed to housing and employment.	The Plan can only take account of the infrastructure planned through the approved Structure Plan.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	ST.3		1	Safeguarding Greenfield Land	Safeguarding should apply to all greenfield sites. The policy should also make reference to protecting best and most versatile agricultural land.	Amend the policy.	Agree that all greenfield should be safeguarded if not needed, but this is the reason for Policy ST.2. Policy ST.3 aims to ensure that open land with value is given appropriate further protection than just the sequential approach. Combining the titles of ST.2 and ST.3, for Policy ST.2, and re-titling Policy ST.3 to refer to the protection of all land with environmental value would be clearer. There is no agricultural land of high value within the city administrative boundary to protect. The policy wording also needs to refer to appropriate protection since the value of some designations varies.	Amend the title to ST.2 and give a new title to ST.3.
9	ST.3		3	Safeguarding Greenfield Land	We should preserve the few green areas we have left.		Support noted.	No change.
141	ST.3		3	Safeguarding Greenfield Land	Support the policies on greenfield land and reducing travel by car.		Support noted.	No change.
28	ST.3		3	Safeguarding Greenfield Land	This protects the natural environment, prevents urban sprawl and adds to the rural setting of the city.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
52		(2.18)	1	Sequential Approach	The paragraph does not refer to the sequential approach.	The text should refer specifically to the sequential approach. The final sentence of paragraph 2.18 should be deleted since there may not always be suitable sites available in the city centre.	Agree in part. Agree that the Strategy Chapter should refer to the sequential approach, but not how it is applied to site selection. This is better explained in individual chapters. Also disagree that the last sentence should be deleted. However, a new sentence should be added that explains that other sites will only be considered if they are made genuinely by public transport, cycling and walking.	Refer to the sequential approach in the new paragraph 2.29a on the central area.
52		(2.19)	1	District and Local Centres.	The paragraph does not recognise that the Local Plan could designate new district and local centres.	Redraft the paragraph so that it supports the development of new district and local centres.	Shopping Policy S.9 covers the issue of new centres, and clarifying the text here would be helpful.	Amend the text accordingly.
163	ST.4		1	Reducing Travel by Car and Promoting Other Means of Travel	Clarify role of developer contributions and planning obligations where relevant.	Add "by securing appropriate developer contribution where necessary and relevant" as last sentence of policy.	The policy implies that contributions will be required, and since planning obligations are specifically referred to by Strategy Policy ST14, it is considered unnecessary to make a specific reference here.	No change.
66	ST.4		1	Reducing Travel by Car and Promoting Other Means of Travel	Policy too short term.	Alternative locational strategy based on 100 plus years' life.	The Local Plan must follow the Structure Plan which sets the strategy to 2011.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	ST.4		1	Reducing Travel by Car and Promoting Other Means of Travel	Objects to the policy as it 'requires' developers to make contributions. The policy provides no opportunity or flexibility and runs counter to advice in Govt. guidance.	Redraft policy to provide flexibility and opportunity for negotiation.	Agree that "measures" set out in the Policy will not always be needed, and consider adding the term "where appropriate" would give flexibility.	Amend Policy ST.4 to include the term "where appropriate".
164	ST.4		1	Reducing Travel by Car and Promoting Other Means of Travel	The emphasis on non car modes is welcome but the policy needs a more flexible approach in recognising that some of the outlying rural areas may not be so well served by other alternatives to the car, and a less restrictive approach should be taken to development in those areas.	Amend the policy.	The city administrative area does not include outlying rural areas.	No change.
28	ST.4		3	Reducing Travel by Car and Promoting Other Means of Travel	More needs to be done to change attitudes towards walking, cycling and using public transport.		Support noted.	No change.
141	ST.4		3	Reducing Travel by Car and Promoting Other Means of Travel	Support the policies on greenfield land and reducing travel by car.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
32	ST.4		3	Reducing Travel by Car and Promoting Other Means of Travel	Support in principle, but need to make sure that appropriate alternative means of travel is available.		Support noted.	No change.
168	ST.4		3	Reducing Travel by Car and Promoting Other Means of Travel	Policy fails to identify the underlying justification of PPG13 namely that the prupose of discouraging travel by car is to secure environmental advantages and that accordingly a development which would generate car travel is not automatically objectionable.		General support for the policy is noted. The policy does not suggest that generating car travel is objectionable, just that it should be minimised. This is entirely consistent with the objectives of PPG13. The text at Paragraph 2.21 explains the environmental purpose of the policy.	No change.
217	ST.5		1	Central Locations for Development which Attracts a lot of People	In order to provide adequate guidance, the proposed policy should include a definition of 'central area'. It should also deal with the consequence of circumstances where 'suitable sites' are not available which would be best handled through the application of the sequential test.	None given.	Agree in part. The central area should be defined in the glossary. However, the policy is intended to set out a strategic principle: development that attracts a lot of people should go to the central area where suitable sites are available. The detailed application of the sequential approach to site selection is explained in the individual chapters on shopping and commercial leisure development.	Introduce definition of the central area in the glossary.

Ref No **Pol No** **Para No**
168 ST.5

T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
1	Central Locations for Development which Attracts a lot of People	'Central area' is not defined in the policies or on the proposals map. It would appear that the area includes not only the historic core of the city but also land on the edge such as the Cattle Market. Having regard to the emphasis in the policies on permitting a wide range of development solely within the central area, it is undesirable for the boundaries of the area to be drawn so widely. Alternatively, if there is no defensible objection to the inclusion within these limits of land proposed to be included, the area should be enlarged to include sites HC.13 and HC.14 and the BT site south of Hempsted Bridge.	Reduce size of central area or, alternatively widen it so it includes these sites.	Agree in part. There is a need to define the central area in the glossary. This should explain that the central area is that land shown on the Central Gloucester Proposals Map; that its boundary has no policy significance but is drawn to include the Western Waterfront and the star attractions of the Urban Design Strategy; that it is not equivalent to the city centre; and that Policy ST.10 in the Strategy Chapter states that the Local Plan gives priority to regenerating the central area subject to certain criteria, including new development being well linked to the attractions of the central area and to the public transport interchange. Given this definition, there is no justification for enlarging the Central Gloucester Proposals Map to include sites HC.13, HC.14 and the BT site south of Hempsted Bridge	Introduce a definition of the central area in the glossary.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	ST.5		1	Central Locations for Development which Attracts a lot of People	The policy must explain the implications of developments that attract a lot of people to out of centre sites if a suitable central site is not available.	The policy should state that if there is not a suitable site then substantial public transport improvement is likely to be required.	Disagree in part. The implications are described in various parts of the text of the Strategy Chapter. (For example, paragraphs 2.4, 2.17 and 2.21). However, the new sentence in paragraphah 2.18 explains that development in other locations would still need to be made genuinely accessible by public transport. Policies TR.30 and TR.34 in the Travel Chapter already cover developer contributions to buses and cycle safety respectively.	No change.
164	ST.5		1	Central Locations for Development which Attracts a lot of People	This type of development need not automatically be limited to the central area. Development could be sited at other locations eg. district centres and near to major public transport interchanges.	Amend policy.	Disagree. The only major public transport interchange is in the central area. The district centres are in comparison poorly served by public transport. The policy does not say that developments will automatically be limited to the central area, but where there are suitable sites available. The new criteria policies in individual chapters cover the sequential approach to new retail and commercial leisure development.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
52	ST.5		1	Central Locations for Development which Attracts a lot of People	The policy does not include the sequential approach	Redraft the policy so that it includes the sequential approach.	Disagree. The policy is intended to set out a strategic principle: development that attracts a lot of people should go to the central area where suitable sites are available. The detailed application of the sequential approach to site selection is explained in the individual chapters on shopping and commercial leisure development.	No change
203	ST.5		1	Central Locations for Development which Attracts a lot of People	The key factor is to ensure that developments which attract a lot of people are located in areas which are well served by means other than the private car - this is not necessarily just the central area of Gloucester.	Delete 'in the central area' from the policy.	Disagree. The central area is the only part of the city that has sufficiently good public transport links to serve developments that attract a lot of people.	No change.
66	ST.5		1	Central Locations for Development which Attracts a lot of People	Policy too short term.	Alternative locational strategy based on 100 plus years' life.	The Local Plan must follow the Structure Plan which sets the strategy to 2011. National guidance reflects that longer term planning is too uncertain.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
52	ST.6		1	District and Local Centres for Everyday Facilities	The policy does not support the development of new district or local centres.	Redraft policy so that it states: district and local centres shall provide facilities which serve suburban areas and the day to day needs of local neighbourhoods respectively.	The policy is intended to set out a strategic principle and shopping policy S.9 covers the issue of new centres. The policy does not imply that new centres will be resisted and the amendment to the supporting text (Paragraph 2.19) clarifies this.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	ST.6		1	District and Local Centres for Everyday Facilities	'New facilities' are not defined. If intended to apply to retail development it should be included in Chapter 8 'Shopping'. Where new facilities are proposed there is no requirement in national guidance or adopted structure plan policies that they should be located in district and local centres. A sequential approach is set out in PPG6 to retail and leisure uses. Where new facilities are proposed within district and local centres they should be consistent with the scale and function of the centre. If policy is to be retained, it should be made clear that the shopping hierarchy is not fixed and new 'centres' can be developed and upon which additional development can be focused. There may be a need to develop additional facilities in the form of new district and local centres.	Deleted or incorporated with policies related to shopping.	Agree in part. Reference to everyday facilities should be deleted and replaced with new development.	Amend policy accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	ST.6		1	District and Local Centres for Everyday Facilities	Policy too short term.	Alternative locational strategy based on 100 plus years' life.	The Local Plan must follow the Structure Plan which sets the strategy to 2011. National guidance reflects that longer term planning is too uncertain.	No change.
163		(2.22)	1	Design Quality	To improve overall urban design standards all developments should be required rather than encouraged to be of high quality (conflict with para 4.4?).	The City Council will require high quality development that respects rhythm, density, massing ... etc.	Agree that a stronger word than "encourage" would be appropriate although "require" is not used in the guidance in PPG1. Consider "expect" to be appropriate.	Amend wording Policy ST.7.
66		(2.22)	1	Design Quality	Design for a 250 year masterplan and then devise strategies to suit design.	Shelving of local plan.	The Local Plan must follow the Structure Plan which sets the strategy to 2011. National guidance reflects that longer term planning is too uncertain. Production of the Local Plan is a statutory duty and cannot be shelved.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184	ST.8		1	Creating Attractive Routes to the Centre	There is no need for distinctive buildings at junctions and roundabouts to inform visitors where they are - "Welcome to Gloucester" signs would suffice. By definition these gateways would be at the city boundary where development should not occur. ST.7 seems to cover all design principles.	Delete policy.	Disagree. Distinctive buildings are not just needed for edge of city gateways to give a good first impression on arrival at Gloucester, but also within the urban area to assist the legibility of the place. Main routes into the centre of the city are particularly important for the impression they give to visitors and this justifies their inclusion in a strategy policy.	No change.
205	ST.8		3	Creating Attractive Routes to the Centre	Support the policy, particularly for the proposed South West Bypass, as new development which is of high quality will help the city achieve its economic, social and environmental aims.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	ST.8		3	Creating Attractive Routes to the Centre	Should be used to encourage the redevelopment of existing sites which are of a poor visual quality and which lie along main routes into the city. The policy should be expanded in order to reflect this pro-active approach to encouraging such development where development would assist in making main routes more attractive to residents and visitors.		Support noted. Agree with the suggestion that the policy should refer to encouraging redevelopment of poor quality sites.	Add an appropriate sentence to Policy ST.8.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
113	ST.9		1	Mixed Use Development	The direct impact on Llanthony will come from the South West By-pass. At no point will there be any relief for Llanthony residents from the effects of the resultant combined traffic flows, both day and night. There will be no acoustic barriers to muffle the noise or air filtration system to purify the air. No traffic control system for the safe ingress and egress of resident's cars and pedestrians and cyclists sharing a combined walkway and cycle track.	None given.	The South West By-pass is a committed scheme and is not an issue for consideration in this Local Plan. In any event the points raised are too detailed for consideration in a Local Plan.	No change.
163	ST.9		1	Mixed Use Development	Make reference to the need for mixed uses within existing buildings as well as new buildings.	A line should be added encouraging mixed use in existing buildings as well as new ones.	Agree.	Add reference to existing buildings in Policy ST.9.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
209	ST.9		3	Mixed Use Development	The policy is supported especially in relation to the regeneration of the Docks and Western Waterfront, however, the Council should make adequate provision to accommodate businesses that are displaced as part of the regeneration process.	None given.	Support noted. It is considered that ample land is allocated for employment development to facilitate relocations.	No change.
200	ST.9		3	Mixed Use Development	Welcomes the provision of the policy and the broad strategic principles it employs, setting out its commitment to the regeneration of the Western Waterfront and securing completion of the South West Bypass underlines the commitment to achieve the Plan's key objectives.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
113		(2.25)	1	South West By-Pass	The direct impact on Llanthony will come from the South West By-pass. At no point will there be any relief for Llanthony residents from the effects of the resultant combined traffic flows, both day and night. There will be no acoustic barriers to muffle the noise or air filtration system to purify the air. No traffic control system for the safe ingress and egress of resident's cars and pedestrians and cyclists sharing a combined walkway and cycle track.	None given.	The South West By-pass is a committed scheme and is not an issue for consideration in this Local Plan. In any event the points raised are too detailed for consideration in a Local Plan.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
152		(Plan 1)	1	Key Development Priorities	Plan 1 fails to identify the historic docks as a key priority for development within the Western Waterfront. Such a priority is given to Blackfriars and this is considered inconsistent.	Request that either the identification of Blackfriars as a key priority is deleted or preferably, the Docks are identified in the same way as Blackfriars to clearly indicate its importance in the successful regeneration of the Western Waterfront.	Disagree. It is correct to highlight Blackfriars as a priority for retail as it is the best site to expand the primary shopping area and link together the other attractions of the centre. While the development of the main Docks area is undoubtedly important, its development may be helped by development elsewhere in the Western Waterfront provided it is in accord with the broad masterplan set out in the Local Plan. Development on other sites in the Western Waterfront could kick-start regeneration eg. by contributing to the completion of the Inner Relief Road.	No change.
209		2.25 2.26 2.27 2.28 2.29 2.30 2.31 2.32	3	Key Development Proposals/Central Gloucester	The GDA welcomes the Councils proposals for regeneration of the central area and Western Waterfront and supports the Urban Design Strategy.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		(2.26)	1	Central Gloucester	The paragraph gives a misleading impression that large areas of Central Gloucester are awaiting redevelopment and the dockland area is available to satisfy the demand for shops, offices, houses and leisure facilities. The site is currently not genuinely "available" and the paragraph should draw more attention to the potential problems associated with bringing land forward for development in this area.	Revision of the paragraph.	This paragraph is factually correct in that there is under-used land with great unfulfilled potential in the central area. It does not imply it is all immediately available and the Plan is in the context of providing for development up to 2011. The fact that the land is described as previously used is sufficient to alert developers to the likely existence of typical issues that will need to be tackled.	No change.
163		(2.27)	1	Central Gloucester - Urban Design Strategy	Plan is confusing.	Produce plan with better clarity.	Disagree. This Plan is a reproduction from the Urban Design Strategy and, when read in conjunction with the text at paragraph 2.27, is clear.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
152		(2.28)	1	Key Development Priorities	Fails to identify the Docks as a key priority for development. Such a priority is given to Blackfriars and this is inconsistent with the role of the Docks as the catalyst to regeneration, and the fact that a comprehensive planning permission exists.	Delete Blackfriars as a key priority, or preferably identify the Docks in the same way to clearly indicate its importance to the successful regeneration of the Western Waterfront.	Agree in part. Blackfriars is now proposed to be included as another character area in the Western Waterfront site, although it remains the best site to expand the primary shopping area and link together the star attractions of the centre. While the development of the main Docks area is undoubtedly important, the appropriate development in any location in the Western Waterfront has the potential to kick-start regeneration and benefit the other parts.	No change.
163		(2.29)	1	Central Gloucester - Western Waterfront and contributions	Need to identify that contributions for infrastructure may be required.	Add bullet point stating that development will be encouraged providing suitable contributions to community and other infrastructure is made where relevant.	The need for contributions from development towards infrastructure is spelt out in paragraph 2.30 and again at paragraph 2.43. A reference in this paragraph would be unnecessary duplication.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
113		(2.29)	1	Western Waterfront development	The impact of new developments in the Western Waterfront must also exert a pressure on the Llanthony area because of its position between The Docks and Monk Meadow Dock. This must bring additional daily movements and add significantly to the volume of local traffic.	None given.	Policy TR.7 in the Travel Chapter will ensure that development west of the canal is properly phased with road improvements.	No change.
139		(2.30)	1	Funding of the Inner Relief Road.	The first bullet point suggests the inclusion of high value uses within mixed use developments will finance the completion of the IRR. Given the various constraints and requirements identified in this paragraph this would appear onerous.	Clarification of bullet point one of paragraph 2.30	The Local Transport Plan currently seeks no extra public funding for Section 4b of the inner relief road and the expectation is that new development will contribute the current shortfall. This is considered realistic on current knowledge of emerging schemes. However, it is unlikely that the full list of infrastructure improvements listed in the text will be fully implemented by developer contribution and the text should reflect this.	Amend paragraph 2.30 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		(2.30)	1	Revitalisation of edge of centre sites	The revitalisation of the edge of centre sites is relying on high value uses which means historically high vehicle trip generators. The proposed SWBP and IRR4b are not designed with much if any spare capacity and unless there is a policy of severe parking restraint on such developments it seems that the strategic benefit of those roads will not be realised.	The plan must acknowledge that transportation is a key issue and potential problem for the Western Waterfront. Traditional high trip generators will need to aggressively change their customers expectations through realistic travel plans. Very high contribution levels will be required for bus provision and enhancements. Add bullet point stating that development will be encouraged providing suitable contributions to community and other infrastructure is made where relevant.	One of the strategic benefits of the planned new road infrastructure is to facilitate central area regeneration, and national policy is to focus major traffic generators in the centre of towns. The Local Plan acknowledges that high value uses are crucial to ensuring viable regeneration schemes and adequate car parking will be necessary to attract development to these locations. This is in fact acknowledged in the County's own parking standards in the Local Transport Plan which seeks to avoid the perverse incentive that lower parking standards in central areas would have on the objective of encouraging development to locate there rather than out of centre. However, Paragraph 2.30 could give more emphasis to the improvements to public transport that may be necessary to create the capacity needed to accommodate the traffic from the Western Waterfront development. Also the importance of improving public transport should be highlighted by its inclusion as a key development	Amend Paragraph 2.30 to give more emphasis to improving bus services. Add improvements to bus provision as a key development priority in Policy ST.12 and new supporting text.

priority of the Plan in the section from Paragraph 2.25 including new text and an addition to Policy ST.12.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		(2.30)	1	Re-organisation of the Westgate gyratory.	Bullet point 3 - whilst there are benefits from this proposal for the accessibility of the island site, it must be made clear that no scheme has yet been devised which safely achieves the aim of removing the Royal Oak Road section of the gyratory system. The highway authority can not guarantee support for this.	The plan must emphasise that no satisfactory scheme has yet been submitted.	The replacement road configuration at Westgate clearly must be safe, but given that the completion of the Inner Relief Road is intended to reduce traffic on the Commercial Road/The Quay route it is pessimistic to assume that a solution will not be found. Removal of the gyratory is essential to knitting back together this part of the central area.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
113		(2.30)	1	Access to Waterside	The development of improved access to canalside and riverside areas will most impact upon the residential environment in Llanthony and Hempsted. Surely any improvement of access should be mainly for pedestrians. Continual use of riverbanks by cyclists would cause only surface erosion damage. Suggests an improved access from The Oxleaze to The Sud Meadow - a footbridge from The Oxleaze (north bank) to The Sud Meadow (south bank) over the eastern arm of The Severn between Lower Parting and Llanthony Weir.	None given.	It is considered that the impact on residential amenity in these areas will be limited. Improvements would involve appropriate surfacing of routes to avoid erosion. A footbridge to Oxleaze would be a good idea but funding is unlikely to be available.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
141		(2.30)	3		Support the redevelopment plans for the Western Waterfront especially those referring to modifications to the highway system and improvements to linkages for pedestrians and cyclists.		Support noted.	No change.
217		(2.30)	3	High value uses within mixed use developments	Supports the recognition that high value uses will be needed to support the regeneration of the Western Waterfront.		Support noted.	No change.
163		(2.31)	1	Western Waterfront and provision of quality car parking	Emphasis seems to be on high quality parking rather than a high quality bus service. The highway authority's aim is to encourage people to leave their cars at home and use local buses, not to use park and ride wherever practicable. There should be a study to identify the level of parking required.	Reword the sentence to put emphasis on the bus links and in particular local bus services.	Agree that reference should be made to extending local services through the site to encourage residents to use the bus. Agree also that the level of car parking to be provided will need to be assessed, but a certain level will be required to ensure the viability of regeneration schemes. The Plan is not specific as to the scale of parking.	Amend paragraph 2.31 to refer to local bus services.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	ST.10		1	Development in the Central Area	Repeats the contents of ST.5. The last sentence emphasising regeneration and Gloucester's special character and sense of place should be added to ST.5.	Delete policy and amend Policy ST.5 accordingly.	Disagree. The two policies address different issues. Policy ST.5 seeks to guide development that attracts a lot of people to the central area rather than to other locations; Policy ST.10 gives priority to all new development that is proposed in the central area provided that it meets certain criteria. However, the criteria on public transport is unnecessarily contained in both policies. It would be better to delete the reference to public transport in Policy St.5 since all the criteria for new development in the central area is covered in Policy St.10	Amend policy ST.5 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	ST.10		1	Central Locations for Development which Attracts a lot of People	'Central area' is not defined in the policies or on the proposals map. It would appear that the area includes not only the historic core of the city but also land on the edge such as the Cattle Market. Having regard to the emphasis in the policies on permitting a wide range of development solely within the central area, it is undesirable for the boundaries of the area to be drawn so widely. Alternatively, if there is no defensible objection to the inclusion within these limits of land proposed to be included, the area should be enlarged to include sites HC.13 and HC.14 and the BT site south of Hempsted Bridge.	None given.	Agree in part. There is a need to define the central area in the glossary.	Define central area in the glossary

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
148	ST.10	(2.29)	1	Development in the Central Area	The emphasis on a significant amount of residential development in the Western Waterfront should be balanced with the need to safeguard the ability to provide a strong commercial centre with good access to public transport. The policy does not consider the need to balance land uses.	Redraft to acknowledge Central Areas importance to retail, cultural, leisure and commercial uses. It should accept the need to balance the attraction of utilising previously developed land to offset the housing requirement of the city with the longer term objectives of ensuring an adequate supply of land for other vital land uses required to ensure the viability of the city centre.	Paragraph 2.30 refers to high value uses and mixed use development and Policy H1 MU2 specifies a wide mix of uses appropriate to a city centre. There are also specific allocations for retail and leisure uses (see Shopping and Commercial Leisure, Tourism and Culture Chapters). It is considered that the level of new housing proposed does not threaten the balance of uses, particularly given the scale of currently under-used land and buildings.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	ST.10		1	Development in the Central Area	The City's objective of regenerating the central area is supported however there is concern that this objective should not be pursued to the detriment of regenerating other areas of the city where previously developed land is located. The policy needs to recognise that these sites may also make an important contribution to meeting the Council's strategic development requirements. Policies ST.10 & ST.5 introduce a 'sequential test' for all development which is acceptable for retail and leisure development but is not applicable to the location of residential development which should be based on the 'search sequence' as set out in PPG3.	Policy ST.10 should be amended to state that whilst regeneration of the central area is a key objective, the redevelopment of previously developed sites elsewhere in the city are of equal importance. The policy should also be amended in accordance with PPG3 and be based on a 'search sequence'.	Disagree. The strategy Chpater explains why the regeneration of the central area is more important than that elsewhere. Policy ST.10 is a strategic policy covering all new development in the central area providing it meets certain criteria. Policies in the individual chapters on housing, shopping and commercial leisure explain how the sequential approach is applied to these different types of developments.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	ST.10		1	Development in the Central Area	The policy seeks to give priority to new development in this location as opposed to other sustainable locations within the urban area and the City Council boundaries, contrary to Government guidance. The policy claims that the central area is well linked to existing attractions and to public transport but without the necessary new infrastructure (SWBP) this statement is of highly dubious validity.	Revision of the policy.	The central area is the most sustainable location in the city. The policy aims to give priority to development that is well linked and builds on the attractions in the centre as is set out in the Urban Design Strategy. The objector mis-interprets this as implying good links to all parts of the city. However, the centre is the hub of the public transport system and offers the best location for good links to all parts of the city, although it is acknowledged that the South West By-pass will enable significant improvements in this respect for the southern sector of the city, which is part of the reason for its identification as a key development priority of the Plan.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	ST.10		1	Development in the Central Area	Scale and location of development, particularly at the Docks, is unrealistic. Further research is required to examine constraints and assess commercial viability. PPG3 supports urban extensions, and deciding how much development should take place beyond the urban area will depend on the capacity to accommodate housing within. However, an element of greenfield will be required.	None specified.	The need for an element of greenfield land for housing and employment development is already acknowledged in the allocation of RAF Quedgeley. Further work on urban capacity has been undertaken (see Housing Chapter) to ensure that the assumptions about brownfield development are realistic.	No change.
200	ST.10		3	Development in the Central Area	Welcomes the provision of the policy and the broad strategic principles it employs, setting out its commitment to the regeneration of the Western Waterfront and securing completion of the South West Bypass underlines the commitment to achieve the Plan's key objectives.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		(2.34)	1	RAF Quedgeley	<p>It provides an inappropriate balance between the amount of new residential and new employment development. QUVL wish to create a balanced community in accordance with PPG13 and the Structure Plan. The City's proposal to only accommodate 1700 new dwellings makes inefficient use of the site and when associated with other employment development in the vicinity generates an unbalanced community. The City Council has decided to safeguard not only a new station for local commuting but also a railfreight terminal facility to serve the sub region even though this latter facility is not mentioned in the Structure Plan. The use of a railfreight facility has knock on implications for the adjoining land uses. There is a more appropriate mix of uses that will enable the</p>	Revision of the paragraph.	<p>Quedgeley has a strategic role to play in respect of employment as set out in Structure Plan Policy E.2. The continued support for a rail freight facility on RAF Quedgeley means that the station cannot be accommodated there and it is now proposed to re-site the station reservation to south of Naas Lane which is the Highway Authorities preferred site (See Travel Chapter).</p>	Amend text in Paragraph 2.34 to reflect change in station reservation location.

Structure Plan housing
and employment
figures to be met.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		(2.34)	1	RAF Quedgeley and Phasing	The phasing of RAF Quedgeley could adversely affect the Highway Authority's ability to deliver the SWBP to schedule. Uncertain obligations on linkages to Quedgeley.	The commencement of development at RAF Quedgeley cannot occur until completion of the SWBP. Pace of development will be linked to other transportation improvements. The development must be well linked to the existing community of Quedgeley and facilities provided at the existing district centre.	The County Council's comment has been up-dated by its agreement at the RAF Quedgeley Inquiry that 500 houses could be built before the completion of the Road. In view of the Chesterton Report on Housing Market Issues and the further urban capacity work (see Housing Chapter), RAF Quedgeley is now to be identified as a strategic site and to be phased only in relation to highway matters (see Policy ST.11). This will give more certainty for the Highway Authority.	Amend Paragraphs 2.35, 2.36 and Policy ST.11 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
201		(2.34)	1	RAF Quedgeley	Support the recognition that the central area cannot accommodate all development needs and recognise that there is potential at RAF Quedgeley to accommodate some of the future development needs. Object to the paragraph because it refer to the site being only part brownfield and does not straightforwardly endorse the development of the whole site which would be an accurate reflection of the Structure Plan. There is no published current Development Brief which justifies the housing number allocated. A reference should be made to the need for the development to be well linked to the existing community of Quedgeley, the adjoining Waterwells employment area and the urban extension at Hunts Grove. Object to the approach of suggesting that there is	None given.	The Plan does allocate the whole of RAF Quedgeley for development, and in the light of advice in "Planning to Deliver" it is now considered to be a "strategic site" that will only be phased on transport grounds. The housing numbers have been recalculated and increased taking into account new information on the scale of the rail freight terminal, and the application of appropriate densities to the net developable area for housing. It is accepted that current links from the site are restricted and these will need to be improved as part of the development and this could be made clearer in the text by referring to "potential" links. The continued support for a rail freight facility on RAF Quedgeley means that the station cannot be accommodated there and it is now proposed to re-site the station reservation adjacent to Naas Lane within the city boundary which is the Highway Authority's preferred site (See Travel Chapter). The wording suggesting the station and rail freight facility may be	Amend paragraph 2.34 to refer to the potential for the site to be well linked.

an option for providing
a station for local
commuting or a rail
freight terminal. RAF
Quedgeley offers
unique advantages for
the location of a rail

needed before 2011 is a
statement of fact and does
not preclude these sites being
rolled forward into reviews
of the Local Plan if that is
appropriate.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
					<p>freight terminal. A station to meet local and national services can be accommodated on land to the south of RAF Quedgeley. This means both can be provided through the co-ordinated and proper development of the wider area.</p> <p>Objection is made to the reference to land being reserved for these potential uses which may be needed before 2001. Government guidance indicates that the reservation of land for rail uses should be long term and not limited by Plan periods.</p>			

CHAPTER 2 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139		(2.34)	1	New Railway Station.	Objects to reference of a new station for local commuting as a site for a new railway station is promoted at Hunts Grove in the Stroud Local Plan. Question the benefit of a station for local commutin as the proposed station site is in the southern periphery of the site, distant from the majority of new residents on RAF Quedgeley. Discussion on the promotion of a passenger station in this general area would be welcomed.	Amend paragraph 2.34 to refer to the potential to provide a new passenger station in the general area, rather than specific to the RAF Quedgeley site.	The City Council are opposed to development at Hunts Grove. However, continued support for a rail freight facility on RAF Quedgeley means that the station cannot be accommodated there and it is now proposed to re-site the station reservation to south of Naas Lane which is the Highway Authorities preferred site (See Travel Chapter).	Amend text in Paragraph 2.34 to reflect change in station reservation location.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		(2.35)	1	RAF Quedgeley and Phasing	The phasing of RAF Quedgeley could adversely affect the Highway Authority's ability to deliver the SWBP to schedule.	The commencement of development at RAF Quedgeley cannot occur until completion of the SWBP. Pace of development will be linked to other transportation improvements. Part completion of elements of the Bypass will not be acceptable to fulfil this condition.	The County Council's comment has been up-dated by its agreement at the RAF Quedgeley Inquiry that 500 houses could be built before the completion of the Road. In view of the results of the Chesterton Report on Housing Market Issues and the further urban capacity work (see Housing Chapter), RAF Quedgeley is now to be identified as a "strategic site" and to be phased only in relation to highway matters (see Policy ST.11). This will give more certainty for the Highway Authority.	Amend Paragraphs 2.35-2.36 and Policy ST.11 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
201		(2.35)	1	RAF Quedgeley Phasing	<p>Support the recognition that development in the central area will be sequentially preferable to RAF Quedgeley. However, object to the phasing arrangements because an allocation on the scale of RAF Quedgeley constitutes a "strategic site" and should not be phased with completions in the centre. Any phasing should be transparent and related to the development over the plan period, allowing investment in infrastructure to be assessed in tandem with rates of development. The references to phasing alongside improvements to the transport infrastructure are insufficiently developed and presumably requires further detailed work through emerging transportation studies. It is more appropriate to identify the objectives of such phasing on the basis that:- 1) development</p>	None given.	<p>Agree in part. In the light of the advice in "Planning to Deliver" and the Chesterton Report on Housing Market Issues (see Housing Chapter) RAF Quedgeley is now considered to be a "Strategic Site" and will only be phased on transport grounds. It is not considered appropriate to take into account Hunts Grove which is being contested at the Stroud Local Plan Inquiry. The County Council has, through the RAF Quedgeley Appeal, adopted a view that the site can commence and develop to 500 dwellings in advance of completion of the GSWBP and this, together with contributions to public transport is considered to be appropriate to include within the Plan.</p>	Amend the text of Paragraph 2.35 accordingly.

south of Gloucester
should not proceed on
an adhoc basis without
proper co-ordination of
transport
infrastructure,
provision and funding,

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Ref No	Pol No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation
				<p>and 2) there is a need to ensure that developments in the Gloucester and Stroud local plans will be capable of funding the relevant transport infrastructure improvements. The co-ordination of funding needs to take account of all development south of Gloucester. Objection is made to the suggestion that development should not proceed before the completion of the SWBP. A number of developments in south Gloucester have proceeded on the basis that major financial contributions have been made to the funding of this bypass which the authorities have not implemented. The approach adopted to ensure that unacceptable congestion does not result in the City should encompass the provision of major infrastructure improvements in terms</p>			

of public transport and
the SWBP.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	ST.11	(2.35)	1	Phasing RAF Quedgeley, Development at RAF Quedgeley	Is it expected that the development of RAF Quedgeley will contribute towards the completion of the SW Bypass? If so, the suggestion that this development should not proceed until the bypass is completed may affect the development as a significant contribution will be required without associated income from house sales.	Clarification of contributions sought from RAF Quedgeley and the provision of the bypass.	Contributions are expected from RAF Quedgeley to the GSWBP, and at the RAF Quedgeley Planning Appeal agreement was reached between the developer and Highway Authority around the payment of contributions which included agreement that up to 500 dwellings could be built in advance of completion of the Road. It is considered this should be reflected in the wording of the phasing policy.	Amend Policy ST.11 accordingly.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	ST.11		1	Phasing RAF Quedgeley	<p>Given the overall development needs to be accommodated, there is a need to adopt a more pragmatic approach towards the release of land for development. There should not only be sufficient housing to be provided but LPAs should plan to meet the housing requirements of the whole community to provide opportunity and choice. It is difficult to see how development at RAF Quedgeley will prejudice development at the Western Waterfront. It is considered that in the context of complementary forms of development likely to take place in the central areas and RAF Quedgeley the phasing policy is unnecessary and indeed it could lead to not all the identified development needs being met by the end of the Plan period. The policy lacks clarity in respect of linking development at RAF</p>	Delete policy.	<p>Agree in part. Given the Chesterton Report on Housing Market Issues (see Housing Chapter) and the new guidance in "Planning to Deliver" it is appropriate to identify RAF Quedgeley as a strategic site. Although it is accepted that there will be limited overlap between the housing markets for the centre and Quedgely it is still appropriate to phase the development of RAF Quedgeley with highway improvements. A revised version of the phasing policy should therefore be retained.</p>	Amend Policy ST.11 accordingly.

Quedgeley to the South
West Bypass.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
44	ST.11		1	Phasing RAF Quedgeley	SW Bypass should be complete before any development begins at RAF Quedgeley.	Amend policy to guarantee construction of by-pass, preferably before development begins.	Disagree. Given funding arrangements which are year by year it is unreasonable to expect a guarantee. The County Council as Highway Authority has also formed the view that up to 500 dwellings can be constructed at RAF Quedgeley before the road is completed (see amended Policy TR.8).	No change.
65	ST.11		1	Phasing RAF Quedgeley	The impact of the large development proposed at RAF Quedgeley on the Trunk Road Network has not been adequately addressed, and nor has the interaction with other major developments around Gloucester such as at Brockworth.	None given.	This objection has now been withdrawn.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
201	ST.11		1	Phasing RAF Quedgeley	Objections is made to the references to development taking place in tandem with development in the Western Waterfront and unclear transportation improvements. Any phasing should be specifically related to dates and incorporated within policy MU.5.	None given.	Agree in part. Given the Chesterton Report on Housing Market Issues (see Housing Chapter) and the new guidance in "Planning to Deliver" it is appropriate to identify RAF Quedgeley as a "strategic site" and amend the phasing approach to link it only to highway improvements. The County Council has, through the RAF Quedgeley Appeal, adopted a view that the site can commence and develop to 500 dwellings in advance of completion of the GSWBP and this should be reflected in amendments to the phasing policies in the Plan. It is not considered necessary to include specific details of phasing in MU.5 as all the policies in the Plan must be considered together, and this would cause duplication.	Amend Policy ST.11 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	ST.11		1	Phasing RAF Quedgeley	<p>The Strategy to phase the development of the two largest housing sites is based on the deliverability of a site (Western Waterfront) which is not currently available and has "floodplain" and "relocation of bad neighbour use" constraints, with a site (RAF Quedgeley) that will be phased with the construction of a By-Pass that does not currently have funding. The RAF site has serious transportation problems and impacts, and the new road is unlikely to be built in the plan period. An independent study of the transport and other infrastructure difficulties should be undertaken to ascertain what proportion of the RAF site can be implemented in the plan period.</p>	None given.	<p>The deliverability of Western Waterfront sites has been analysed in further urban capacity work and there is now more confidence about the development of sites within the Plan period. There is also increased certainty that the GSWBP will be completed in the middle of the Plan period. The evidence is that these two sites will deliver the housing numbers expected of them in the Plan period. The phasing approach has however been amended for other reasons.</p>	No change in response to this objection.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	ST.11		1	Phasing RAF Quedgeley	Concerned that the policy allows for progress to development at RAF Quedgeley in tandem with city centre developments. This is unlikely to be achievable and there is a risk that the development at the sequentially less favourable Quedgeley site may progress in advance of city centre schemes threatening projects over the long term. Also concerned at the Council's decision to prioritise development at RAF Quedgeley when alternative urban extension developments have the potential to deliver greater sustainable planning objectives. There is a risk that development at RAF Quedgeley will prejudice city centre development and conflict with Government guidance whilst also not delivering a new sustainable community.	Redraft the policy to make it clear that any development at RAF Quedgeley does not take place in advance of sequentially preferable sites in the city centre or other urban extension locations that can offer enhanced sustainable development opportunities.	The phasing of RAF Quedgeley must be reconsidered in the light of the Chesterton Report on Housing Market Issues and the guidance in "Planning to Deliver". It is appropriate to identify RAF Quedgeley as a "strategic site" and, given that the development will help fund the By-pass which will assist with regeneration in the centre it is desirable that it develops alongside central area opportunities. An urban extension at Quedgeley is identified in the Structure Plan and offers the opportunity for a properly planned community utilising a significant amount of brownfield land. It is considered there are no preferable urban extension options.	No change in response to this objection.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184	ST.11		1	Phasing RAF Quedgeley	Development at RAF Quedgeley should not be dependent on the South West Bypass.	None given.	Disagree. The South West By-pass is critical for the transport network to cope with the travel demands arising from this area and for creating the capacity in the southern corridor for public transport improvements.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	ST.11	(2.35)	1	Phasing RAF Quedgeley	<p>It seeks to apply the sequential approach incorrectly by delaying the development of RAF Quedgeley. It is based on the assumption that redevelopment of the central area will somehow be inhibited by an early start at RAF Quedgeley. RAF Quedgeley is a complex site with remediation and infrastructure problems. It is a previously developed site and an identified site for strategic development. As such it should be brought forward to meet Structure Plan requirements. The redevelopment will have little impact on the ability of the central area sites to come forward for development whose problems include landownership, contamination, infrastructure and flooding. The proposed form of development appears to comprise more high</p>	Revision of the paragraph.	<p>The Chesterton Report on Housing Market Issues suggests that the effect of RAF Quedgeley on central area completions will be limited and phasing for this reason is therefore now considered inappropriate. The review of the Housing Strategy in accordance with Planning to Deliver (see Housing Chapter) identifies RAF Quedgeley as a Strategic Site which will need to develop alongside the central area. Phasing is still, however, required in relation to transport infrastructure.</p>	Amend Paragraph 2.35 and Policy ST.11 accordingly.

density apartments
which contrasts with
the RAF Quedgeley
site where the majority
of residential
development could be
for family housing.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
28	ST.11		3	Phasing RAF Quedgeley	<p>Objection which seeks to link the development at RAF Quedgeley with the start of development at Western Waterfront and with the implementation of the SWBP. Completion of the SWBP is dependent upon funds from RAF Quedgeley. Without an early start at RAF Quedgeley the implementation of the SWBP will not be delivered.</p> <p>Present roads are inadequate to handle the increased journeys caused by developing RAF Quedgeley.</p>		<p>Support noted. However, the Highway Authority's view is that up to 500 houses can be built before the Road is complete and this is now reflected in the Plan's phasing policies (see also Policy TR.8).</p>	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		(2.36)	1	South West Bypass and St. Ann's Way bridge Link - improvements to public transport	Direct reference to improvements to public transport and infrastructure is required.	Add new sentence at end of paragraph "contributions will be sought to provide relevant and appropriate public transport and other non car transport methods".	Disagree. Such a reference would be inappropriate here as this paragraph explains why these road schemes are a key development priority for the Plan. Reference is already made to the Roads' importance for enabling the implementation of schemes to promote other modes.	No change.
167		(2.36)	1	The Gloucester South West Bypass and the St. Anne's Way Bridge Link	Objects because of the way it defines the relationship between the proposed SWBP and the development at RAF Quedgeley. Implying that the road must be built before development at RAF Quedgeley can take place is unrealistic and inappropriate. Given the likely sources of funding the road, the early release and development of RAF Quedgeley is needed in order to facilitate the construction of the remaining stages of the SWBP.	Revision of the paragraph.	This paragraph implies that a substantial development of the RAF Quedgeley site needs the by-pass. This remains a statement of fact taking into account the latest position of the Highway Authority which is now acknowledged in the proposed amendment to Policy ST.11 (and TR.8).	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	ST.12		1	Key Development Priorities	The key Western Waterfront site falls within the floodplain. Although improvements could be made as indicated by the Environment Agency, the site may not be able to deliver the dwelling numbers expected. Bad neighbour uses also have to be relocated and there is no evidence that the land can be assembled to enable development within the Plan period.	None specified.	Further analysis of the developability of this area has been carried out as part of the Urban Capacity Study which suggests a higher number of dwellings may be expected in the plan period (see Housing Chapter changes).	No change.
184	ST.12		1	Key Development Priorities	The South West Bypass is a good example of unsustainable development and should not be one of the key objectives. It is not right that millions of pounds of public money be spent on subsidising private transport.	None given.	Disagree. The South West By-pass is sustainable because it is needed to provide the capacity to enable bus priority to be implemented, and to help ensure that the regeneration and future vitality of the centre is secured.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	ST.12		1	Key Development Priorities	Support is given to the completion of the Inner Relief Road and the Gloucester South West Bypass, although objection is made to the inclusion of the phased mixed use development at RAF Quedgeley on the grounds that other urban extensions should also be given consideration.	Redraft policy to clarify that development at RAF Quedgeley will only be allowed following advancement of development at sequentially preferable sites within the City Centre and at more sustainable urban extension locations.	Housing allocations have been reconsidered in the light of further work on Urban Capacity. RAF Quedgeley is an urban extension mentioned in Structure Plan Policy and which would deliver the redevelopment of significant amounts of brownfield land as well as contributing to the delivery of the By-pass which will underpin the success of regeneration in the centre of the city. It is now to be considered a "strategic site" in terms of the advice in "Planning to Deliver". There is no better urban extension in terms of national and local policy, and no need to consider other, purely greenfield, sites.	No change.
168	ST.12		1	Key Development Priorities	Although the redevelopment of Blackfriars should be a key priority, it is not appropriate to redevelop it for higher order comparison goods shopping and leisure uses.	None given.	Disagree. Blackfriars is suitable for retail and leisure development provided the design is appropriate. It is the best location to expand the primary shopping area and link together the other key attractions of the centre.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	ST.12		1	Key Development Priorities	Consequent to objection to Policy ST11 there is no need to refer to "phased" mixed used development of RAF Quedgeley.	Delete "phased" from bullet point 2.	It is considered useful to include the term "phased" since there is a very clear need to ensure only limited development of the site in advance of the completion of GSWBP. It is important to avoid undue congestion.	No change.
65	ST.12		1	Key Development Priorities	The impact of the large development proposed at RAF Quedgeley on the Trunk Road Network has not been adequately addressed, and nor has the interaction with other major developments around Gloucester such as at Brockworth.	None given.	This objection has now been withdrawn.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	ST.12		1	Key Development Priorities	Completion of SWBP is first priority for redevelopment of the brownfield land and development of RAF Quedgeley.	In order that this priority is shown and proper status afforded, item 3 in the policy should be moved to item 1.	To a degree the order of this list is unimportant since all the objectives will in reality be pursued at the same time. However, the regeneration of the centre is the council's top priority. To achieve this the completion of the road infrastructure is essential. The development of RAF Quedgeley is important to help fund the By-pass. It is considered that this order should be followed. Although of great significance the role of the bus is likely to become more important as the Plan progresses, and this new development priority should therefore be listed last.	Amend Policy ST.12 accordingly and make clear that the central area is the first priority in Paragraph 2.26.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
152	ST.12		1	Key Development Priorities	The policy fails to identify the key role in securing the regeneration of the City that the historic docks will play. Inappropriate weight is given to the development of Blackfriars. The Docks will consolidate in its role as the primary leisure quarter of Gloucester once planning permissions are implemented.	Redraft policy to read "The City Council's key priorities for development are:1. The regeneration of the central area including mixed use redevelopment in the Western Waterfront, high order comparison goods shopping and leisure uses at Blackfriars and a mix if uses, including Leisure uses at the Docks."	Agree in part. Blackfriars is now proposed to be included as another character area in the Western Waterfront site, although it remains the best site to expand the primary shopping area and link together the star attractions of the centre. While the development of the main Docks area is undoubtedly important, the appropriate development in any location in the Western Waterfront has the potential to kick-start regeneration and benefit the other parts.	No change.
167	ST.12		1	Key Development Priorities	Objects to the inclusion of the word "phased". Policy is unclear and fails to set out a realistic position in terms of delivery of the stated key priorities. There is no realistic major alternative to the RAF Quedgeley site.	Revision of the policy.	It is considered useful to include the term "phased" since there is a very clear need to ensure only limited development of the site in advance of the completion of GSWBP. It is important to avoid undue congestion.	No change.
28	ST.12		3	Key Development Priorities	The policy will ensure much needed development and also protect greenfields from development.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
193	ST.12		3	Development in the Central Area	Cannot understand the empahsis on Blackfriars when the central area is in a terrible state of decline. The empahsis must be on regenerating the centre and cleaning it up. Furthermore there should be some limited free parking in the centre like Cheltenham.	Halt plan for Blackfriars and concentrate on the historic city centre to complement the Cathedral. Provide limited free parking.	Support noted. Blackfriars redevelopment is intended to broaden the city's shopping profile and generate more customers to benefit all businesses in the centre.	No change.
166	ST.12		3	Key Development Priorities - The completion of the Inner Relief Road and the South West Bypass	Strongly supports the City Council's key priorities for development and in particular, the South West By-pass. It has the added benefit of freeing up British Waterways land holding at Netheridge and diverting the canal which is identified in the Waste Local Plan as a potential transfer facility for waste.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
200	ST.12		3	Key Development Priorities	Welcomes the provision of the policy and the broad strategic principles it employs, setting out its commitment to the regeneration of the Western Waterfront and securing completion of the South West Bypass underlines the commitment to achieve the Plan's key objectives.		Support noted.	No change.
167	ST.13		1	Safeguarding the Strategy	It is inconsistent with Govt. guidance as set out in PPGs 1, 3 & 12.	Delete policy.	Do not consider the policy is inconsistent with national guidance. The policy emphasises the importance of the key development priorities and sets out in principle the test against which other proposals will be judged.	No change.
168	ST.13		1	Safeguarding the Strategy	Although the redevelopment of Blackfriars should be a key priority, it is not appropriate to redevelop it for higher order comparison goods shopping and leisure uses.	None given.	Disagree (see response to Policy ST.11). It is appropriate to provide protection to the strategy of the Plan.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	ST.13		1	Safeguarding the Strategy	The need for this policy is questionable, given that key development priorities are highlighted.	Delete the policy.	The policy emphasises the importance of the key development priorities and sets out in principle the test against which other proposals will be judged.	No change.
163		(2.39)	1	Implementation - no reference to County Council	It should be made clear that the "Education Sector" includes as principal authority, Gloucestershire County Council as local education authority. Bullet no.7 omits to refer to working with the County Council in seeking additional funding by way of planning obligations to SWBP, Education, Fire and Rescue, Social Services, Libraries etc.	Working with the LEA and other elements of the education sector to realise new centrally located buildings for Secondary and Further Education. Working with the County Council to seek contributions, planning obligations and further funding to accelerate the provision of the SWBP, Education and other community facilities, public transportation and non-car transport measures.	Agree in part. Specific reference to the education authority would give clarity. However, the list of points in this paragraph is to highlight the key things that are being done to improve the central area. It is neither an exclusive list nor is it meant to be a list of items to which contributions will be sought through planning obligations.	Amend bullet point six to refer to the Local Education Authority.
233		(2.39)	1		This paragraph should include reference to the Environment Agency as one of the organisations involved in the partnership bringing about redevelopment of the Western Waterfront.	None given.	Agree.	Add a reference to the Environment Agency in bullet point one of paragraph 2.39.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		(2.41)	1	RAF Quedgeley and completion of South West Bypass	Completion of SWBP is pre-requisite to any development at RAF Quedgeley.	The site owners aim to have the site significantly developed by 2011. This will only be permitted providing SWBP is completed before any construction starts.	Agree in part. The Highway Authority's view about the commencement of development changed at the RAF Quedgeley Planning Inquiry. Nevertheless the wording of Paragraph 2.41 needs up-dating to reflect the current position.	Amend Paragraph 2.41 to give the up to date position.
163		(2.42)	1	RAF Quedgeley and contributions to South West Bypass	The scale of the development at RAF Quedgeley is such that substantial contributions will be expected to ensure completion of the SWBP which is a pre-requisite of the start of any construction.	The SWBP is supported by GOSW and it will be partly funded by developer contributions and public finance. The scale of development and impact is such that the developer contributions will be significant. The completion of the road is anticipated in 2006.	Agree in principle. Paragraph 2.42 needs up-dating to reflect the Highway Authority's view about the commencement of development and it would be helpful to emphasise that a significant contribution is expected.	Amend Paragraph 2.42 accordingly.
163		(2.43)	1	Implementation - County Council involvement in planning obligations	The County Council has a major statutory input to securing planning obligations. It should be made clear that they must be involved in negotiations affecting education, community, transport etc.	The County Council will where appropriate in determining planning applications, seek with the County Council to enter into agreements under S.106 of the 1990 Act ... etc.	Agree. It would be helpful to point out that both the City and County Councils will be involved in negotiating planning agreements.	Amend Paragraph 2.43 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
147	ST.14		1	Developer Contributions	Places emphasis on ensuring that "reasonable" consideration is given to developer contributions, and that these are fairly related to the specific development proposals reflecting other cost obligations and individual site constraints.		Agree. The policy does reflect that contributions must be reasonable and is in accordance with national guidance.	No change.
132	ST.14		1	Developer Contributions	The policy is not precise enough. The Council should publish SPG setting out the mechanism for the calculation of such contributions.	Council to produce SPG on Developer Contributions.	Agree in part. SPG is helpful in certain instances and the Council has published guidance on Public Open Space contributions. However, contributions often are affected by site and market conditions and are not easily subjected to a formula approach. The policy accords with current national guidance.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	ST.14		1	Developer Contributions	Should make express reference to Circular 1/97.	None given.	The use of the term "reasonable contributions" implies that the council will follow the terms of national guidance. To do otherwise would be unreasonable. It is not best practice to repeat wording from circulars as these may change. This is likely to be the case with Planning Obligations given the current Government Consultation Paper.	No change.
203	ST.14		1	Developer Contributions	Policy does not adequately reflect Circular 1/97 in so far any contributions sought have to be directly related to the proposed development and be fairly and reasonable related in scale and kind to the development.	Add "fairly and reasonably related in scale and kind" after "contributions" in the 5th line of the policy. Add "directly" between "services" and "related" to the last clause of this policy.	The use of the term "reasonable contributions" implies that the council will follow the terms of national guidance. To do otherwise would be unreasonable. It is not best practice to repeat wording from circulars as these may change. This is likely to be the case with Planning Obligations given the current Government Consultation Paper.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	ST.14		1	Developer Contributions	Welcome the Council's approach but would suggest that the policy would benefit from redrafting to reflect more accurately advice in Circular 1/97.	Redraft policy.	The use of the term "reasonable contributions" implies that the council will follow the terms of national guidance. To do otherwise would be unreasonable. It is not best practice to repeat wording from circulars as these may change. This is likely to be the case with Planning Obligations given the current Government Consultation Paper.	No change.
168	ST.14		1	Developer Contributions	Circular 1/97 makes clear that planning obligations may enhance the quality of development and enable proposals to go ahead which might otherwise be refused.	The policy should be reworded to accord with national advice within Circular 1/97 together with the reasoned justification.	Although the wording of national guidance is not directly used, Paragraph 2.43 does refer to development contributions raising the quality of life. It is not best practice to repeat wording from circulars as these may change. This is likely to be the case with Planning Obligations given the current Government Consultation Paper.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
155	ST.14	(2.43)	1	Developer Contributions	Policy is ambiguous in its requirements and appears to go beyond the scope of Government guidance.	Policy should refer to the relevant Circular and include the words - "directly related to the proposed development and fairly and reasonably related in scale and kind to the proposed development."	The policy is not ambiguous and by stating that reasonable contributions will be sought indicates that national guidance will be followed. The council would otherwise be acting unreasonably. It is not good practice to refer to specific wording from circulars as they are liable to change. On the issue of Planning Obligations this is more than likely within the lifetime of the Plan given the current Government Consultation Paper.	No change.
163	ST.14		1	Developer Contributions	Specific reference to bus services would be helpful, they could be the most expensive thing in the package.	Include reference to bus provision.	Although bus provision may be a very significant contribution, so too may be affordable housing, schools etc. This is a general policy and specific topics do not need highlighting.	No change.
196	ST.14		3	Developer Contributions	The policy requires developers to make contributions towards the provision of community services and health care facilities related to their development proposals.		Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	ST.14	(2.37, 2.38, 2.39, 2.40, 2.41, 2.42, 2.43)	3	Developer Contributions	Supports the efforts to secure funding for the provision of certain physical and social infrastructure providing these are reasonable and relate directly to the proposed new development in accordance with Circular 1/97, and providing these requirements are applied consistently and fairly to all development sites in the City.		Support is welcome. The use of the term "reasonable contributions" implies that the council will follow the terms of national guidance. To do otherwise would be unreasonable. It is not best practice to repeat wording from circulars as these may change. This is likely to be the case with Planning Obligations given the current Government Consultation Paper.	No change.
214			3	Overall Strategy	The strong sustainability strategy and approach of the Plan is welcomed. In particular the sequential approach to housing and the phasing of greenfield development is supported.		Support noted.	No change.
140			3	Involve the wider community in consultation	Involve the wider community in consultation including the Asian Elderley's of Gloucester.		Comment noted. The development of the Local Plan has been the subject of wide community consultation (see Statement of Public Consultation June 2001),	No change.

CHAPTER 3 - Natural Environment

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
164		3.7	1	Species decline	Paragraph contains a number of subjective statements about wildlife decline. Assertions of this nature should be based in verifiable factual evidence that are well related to the plan		Statements are not subjective and can be verified. However, it is accepted that the paragraph does little to add to the policies and can therefore be deleted.	That paragraph 3.7 be deleted.
197		3.9	2	Key Wildlife Sites policy	Structure Plan recognises the importance of KWS and advises other local authorities to adopt policies to protect such sites in their local plans. Although reference is made to KWS in para 3.9 there is no policy to protect those sites in Gloucester.	New Policy. 'Development will not be permitted that would have a significant impact on the ecological interest of a KWS. Where development affecting a KWS is permitted the proposal will be required, where feasible, to seek enhancement of the conservation interest of the site'.	There are few KWS in the City. What there is will correspond to a City Council grade A or B site. To identify another tier of designation with its own policy would further confuse matters. However it is a valid point and it is proposed that the sites that are KWS are identified in the appendix and mentioned in the text accordingly.	Amend paragraph 3.9 to take account of KWS. Insert new paragraph after policy B.3 and identify KWS in appendix.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
197		3.10, 3.11, 3.12	1	Critical and Tradable Assets	The concept of critical and tradable assets was popular 5 or 6 years ago but has been overtaken by Biodiversity process. Concern that by identifying whole site as being tradable may establish a presumption in favour of development.	Delete 3.10, 3.11 and 3.12	Accepted in part. Use of terminology is causing confusion.	Delete paragraphs 3.10, 3.11 and 3.12
226		3.10-3.12	1	Critical and Tradable Assets	Concerned that the concept of using tradable and critical assets effectively identifies them as potential development sites.	Paragraphs 3.10, 3.11 & 3.12 be	Accepted in part, deleted from the plan. confusion	Delete paragraphs 3.10, terminology is causing 3.11 & 3.12
122	B.1, B.2, B.3, B.4,		1	SSSI's, Sites of Nature Conservation Interest, Corridors, Biodiversity Action Plan	These policies are negative and seek to prevent development rather than facilitate it.		The majority of these policies concern assets which once lost they are gone for ever. Framing policies to protect these assets is always going to be difficult in a way that gives a positive perspective with respect the opportunities for development.	No change
164	B.1		1	Sites of Special Scientific Interest	SSSIs should be identified on the proposals map		Accepted - the reason they were not included was for the sake of clarity given the number of existing designations, and that the fact that they are already Sites of Nature Conservation Interest.	That the 2 SSSIs in the City be identified on the proposals map

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
197	B.1		3	Sites of Special Scientific Interest	The Trust supports policy		Support welcomed	
226	B.1		3	Sites of Special Scientific Interest	Strongly supports		Support welcomed	
226	B.2		1	Sites of Nature Conservation Interest (A&B)	Supports general thrust of policy however is concerned at lack of reference to enhancement.		Enhancement is addressed in Amend policy B.6 However it is accepted that enhancement could apply to more areas. Amend final sentence of Policy B.2 to read 'Where development is permitted, mitigation or compensatory habitats will be required that in the long term ensure that the overall value of the area is enhanced'.	
226	B.2		1	Key Wildlife Sites within Sites of Nature Conservation Interest	Policies do not recognize the value of KWS, these should be mentioned in B.2 or in another policy.		Although some A&B sites are KWS the boundaries are not always the same. To have a policy we would need to identify sites on the proposals map which would be too complex. However it is accepted that it may appear confusing to those who are familiar with KWS therefore the text and appendix 1 will be amended accordingly and the supporting text changed to ensure that KWS are covered	Amend paragraph 3.9 and Policy B.2 accordingly.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
197	B.2, B.3		1	Sites of Nature Conservation Interest (Appendix 1)	With reference to Paragraphs 3.10-3.12 the Trust is of the opinion that some sites listed in the Appendix have been allocated an incorrect grade. This is critical as the grading of SNCI's in the Local Plan determines which policies apply to which sites.	The Trust would wish to see the reallocation of grades to some sites. We would be happy to advise on this further	The Trust has not provided further information on the regrading of sites. With the provision of this information, the Council would be happy to incorporate it into the Local Plan.	No change
197	B.2, B.3		1	Sites of Nature Conservation Interest	There is no real difference between the two policies. In fact it is possible to read B.3 as giving greater protection than policy B.2. Pre-ambles establish that A & B sites are not re-createable and thus their loss can not be mitigated against, yet the policy proposes just this. In line with biodiversity principles these policies should be seeking enhancement.	The policies need to be reworded to give adequate protection to habitats which can not be recreated.	Accepted in part. Policy and pre-ambles need re-writing to avoid confusion over non-tradable assets being tradable, and tradable assets that can not be recreated.	Amend accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
34	B.3		1	Sites of Nature Conservation Interest (C& D).	Blanket protection of the site is unwarranted.	Remove the majority of the land as a Site of Nature Conservation Interest and reallocate as POS.	The site is designated a grade D and we have no information as to why it should not still be designated as grade D. With respect to POS the area could be POS and still maintain its D status. As to identifying it as POS, realistically there is no mechanism of achieving that objective.	No change
123	B.3	3.25	1	Identification of NC 19 Horsbere Brook as a grade C Site of Nature Conservation Interest	There are insufficient ecological or geological interests on site to warrant the allocation. In so far as there might be - the boundary shown has been drawn inaccurately.	Deletion of NC19	Site was surveyed in July 2000 by an independent consultant and deemed to be worthy of inclusion as a grade D site, with the actual brook being a grade C. The site surveyed corresponds to the site identified on the proposals map	No change
163	B.3	Appendix 1	1	Inclusion of item 19 Horsbere Brook	Object to inclusion of Horsbere Brook."NC25 is either not zoned or coloured correctly"	Delete item 19 in appendix 1	Site 19 was surveyed by independent consultants and was considered worthy of protection. NC25 refers to the area identified on the proposals map outlined in green. It is accepted that the notation NC.25 is not within the area and this will need to be changed.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
167	B.3		1	Sites of Nature Conservation Interest (C&D)	Objector objects insofar as it affects areas NC13, 28 & 29 that are on or adjacent to RAF Quedgeley site		NC 29 has declined and will need to be deleted. NC.13 is predominantly within the ownership of the City Council, its northern section will come over to the City Council, it is also identified as an ecological asset by the developers of RAF Quedgeley who have offered to pay for its improvement. The value of NC 28 has also been recognised by the developers and its most important features retained or mitigated against in the proposal put forward as part of the negotiations with regard to the planning application.	Delete site 29 from proposals map and from appendix A
170	B.3		1	Sites of nature conservation interest (A & B)	The extent of site 27 is not clear, nor is the way the Policy might be interpreted	The site should be restricted to the moat itself and the area within it.	NC.27 on the proposals map includes the Moat and the area enclosed by it. However, since the publication of the deposit draft consultants have re-surveyed the site and recommend that the whole site be designated a grade D.	That the whole former woolstrop cottage site be designated a grade D Site of Nature Conservation interest.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
203	B.3		1	Sites of Nature Conservation Interest (C&D) (Site 28, Appendix 1)	It has been accepted by the Council that NC 28 has diminished in value to the extent that such designation is no longer justified.	Delete NC 28 from proposals map and appendix	The value of NC 28 has not diminished to the extent that such designation is no longer justified as is made clear in the environmental statement submitted with the application. With regard to the inquiry in to the application its value has been traded for improvements to Daniel's Brook. At time of draft being published negotiations were still in place.	No Change
226	B.3		1	Sites of Nature Conservation Interest (C&D)	Supports general thrust of policy however is concerned at lack of reference to enhancement		Enhancement is addressed in Amend Policy B.6. However, it is accepted that enhancement could apply to more areas. Amend final sentence of B.3 to read as follows 'Where development is permitted mitigation and/or compensation on or off site should over the long term lead to an enhancement of the nature conservation value of the area.	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
49	B.3		2	Sites of Nature Conservation Interest (C& D): land between B4008 and A38, part of MU.5	Area of land between A38, B4008 and new link road should be reserved for its nature conservation value.	That the grounds be retained as at present for owners exercising dogs and the retention of the natural habitat and foliage.	Part of the site will have to be kept open due to noise constraints and the wildlife potential around the wetland area has been recognised and built into the current proposals. Together, these should mitigate the problem identified by the respondents. There are no constraints on the remaining area however, and this may be developed. The area currently has no formal public access.	No change
54	B.3		2	Sites of Nature Conservation Interest (C& D): land between B4008 and A38, part of MU.5	Concern at link road for RAF Quedgeley between A38 and B4008. And impact upon the area's nature conservation interest.	Keep field as a nature conservation area	Part of the site will have to be kept open due to noise constraints and the wildlife potential around the wetland area has been recognised and designed into the current proposals. Together, these should mitigate the problem identified by the respondents. There is no reason why the rest of the site should not be developed however.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
236	B.3		2	Sites of Nature Conservation Interest: Woolstrop Cottage	Woolstrop cottage is important as a site of urban biodiversity and indirectly contributes to the enjoyment and amenity of local people. This site acts as a stepping stone for wild flora and fauna within the definition of regulation 37 of the habitats regulations 1994. Paragraph 14 of PPG 9 says many urban sites for nature conservation have enhanced local importance. The site probably supports protected species besides badgers		The site has been re-surveyed and the whole site has been identified as a grade D. The objector needs to read revised policy B.2 to understand the constraint that this places on the site.	Identify the whole of the former Woolstrop cottage site as a grade D Site of Nature Conservation Interest.
233		3.26	1	Corridors	It is suggested that the paragraph is amended to state that where public open space or linear recreation routes are incorporated into riverside corridors a wider corridor may be required to ensure that all nature conservation interests are not compromised.		In part accepted, public open space can function as a wildlife corridor and indeed depending on the site a cycleway/footpath may be perfectly acceptable. However there may be instances when a wider corridor is needed to accommodate multiple uses, it is considered useful therefore to incorporate some of the objectors comments within the text.	Add to paragraph 3.26 'If open space can function as a cyclepaths, play areas and other similar uses are to be located in this Public Open Space then this will have to be taken into account when calculating the size of the corridor'.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233		3.27	1	Corridors	Recommend inclusion of a statement indicating that the Council will support the removal of existing culverts		Accepted. Add extra line to paragraph 3.27 'where development sites include existing culverts the council will actively promote their removal'.	Amend paragraph 3.27 accordingly
164	B.4		1	Corridors for wildlife	No reasoned justification has been given for the figure of 8 metres. It should be deleted or clarified. The river corridors should be identified on the proposals map.		8 metres is considered reasonable and achievable. Accepted that brooks should appear on proposals map.	Include brooks subject to policy B.4 on proposals map
197	B.4		1	Corridors for wildlife	Concern that some of the sites designated as C or D are not tradable in that they can not be re-created over a reasonable time scale. Identifying a site as tradable implies development can go forward		Accepted that C and D sites are not always tradable, however, their worth means that development may be acceptable as long as the value (not necessarily the same habitat) can be recreated. The confusion is understandable and the text and policy should be amended.	Amend paragraph 3.25 accordingly
217	B.4		1	Corridors for wildlife	There is no basis given for the minimum requirement of 8 metres for the maintenance of wildlife corridors		Further text will be included giving the reason for the figure chosen	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
226	B.4		1	Corridors for wildlife	Given likely improvements in river water quality, water courses which are currently of low quality as corridors will be greatly improved. Development should not compromise potential future enhancement even if current interest is low.		All watercourses in the city have been identified irrespective of water quality (as it happens water quality is quite good across the city) as ability to act as a corridor still warrants their protection.	No change
233	B.4		1	Corridors for wildlife	FRP.5 requires an 8 metre wide maintenance strip to be retained either side of any watercourse in the City. For the sake of consistency, and in recognition of their value as ecological corridors, it is recommended that this approach is also applied to policy B.4 rather than restricting it to those water courses identified on plan 3.		In principle this would seem a good idea. However there is pressure to include all nature conservation constraints on the proposals map. The objective behind plan 3 was to avoid the cluttering up of the proposals map. GOSW have expressed concern at the use of the plan rather than the proposals map so watercourses will now be plotted. In reality what is shown on plan 3 is all the water courses in the City.	Include water courses on proposals map.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
197	B.5		1	Biodiversity Action Plan Species and Habitats	The Trust supports the principle of policy but is concerned it is not cross referenced with other policies and thus leads to confusion. Developments involving BAP habitats or species should be seeking overall enhancement of resource.	Delete 'unless the importance of the proposal outweighs the ecological and/or compensatory measures will be required'. And replace with 'Where possible all developments should seek to contribute to BAP targets by buffering and expanding BAP habitats and providing for BAP species'.	Accepted in part. There will always be cases where the need for the development is greater than the value of the habitat especially if the loss can be mitigated. All developments can not reasonably be expected to contribute to BAP targets or indeed other social goods, however, there will be certain developments where through location, or type of development this is a reasonable request. Amend B.5 to take on board UK and Glos BAP targets.	Amend B.5 accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
226	B.5		1	Biodiversity Action Plan Species and Habitats	Supports aims of policy however it should also refer to the UK Biodiversity Action Plan.		Accepted. Re-write policy B.5 to read as follows: 'Development will not be permitted that would harm a species or habitat identified in the UK or Gloucestershire Biodiversity Action Plan, unless the City Council is satisfied that the need for the development outweighs the ecological value of the species or habitat identified. Where development is permitted, mitigation or compensatory habitats will be required that contribute to UK or Gloucestershire BAP targets and enhance their value long term.	Amend policy B. 5 accordingly
122	B.6		1	Prime Biodiversity Areas	The key test against which a development should be assessed is that no net loss occurs. Net gain should be an additional benefit to be accrued from the development.	Reference to enhancement be preceded by the words 'where possible'	Policy seeks to redress the significant losses in biodiversity experienced over the past few years. Maintaining the status quo is not an option if we are really to stem declines further. Suggestion by HBF however appears reasonable in the context of land use planning and what it can reasonably expect to achieve. Insert 'where possible' between 'proposal' and 'will lead'.	Amend Policy B.6 accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
164	B.6	3.30	1	Prime Biodiversity Areas	The Prime Biodiversity area should be defined on the proposals map.		Accepted	That the PBA be identified on the proposals map
166	B.6		1	Prime Biodiversity Areas	Supports policy but objects to description of landfill site as Hemspted Tip. Also objects to fact that PBA is not identified		Accepted that term 'tip' not appropriate and that the PBA should be identified on proposals map.	Amend policy accordingly
197	B.6		1	Prime Biodiversity Areas	Support policy in principle, however it appears to give more protection to an un-designated site. Any development in this area requires biodiversity gains, developments affecting SSSIs and SNCIs do not.	Retain policy but strengthen other nature conservation policies	Problem appears to be with other policies rather than B.6. Accepted that enhancement is an issue that should be addressed.	Policy B.1 & B.2 to include enhancement
226	B.6		3	Prime Biodiversity Areas	Support		Support welcomed	
164	B.7		1	Protected Species	The final sentence of the policy relates to a matter of process	it should be re-drafted or deleted from policy	Accepted last sentence to be deleted.	Delete last sentence of Policy B.7
197	B.7		1	Protected Species	The Trust supports policy, however, it needs to be strengthened to ensure populations of protected species retain their viability if affected by development.	Amend first sentence to read .. 'to ensure that the protection and welfare of the species and the future viability of population of that species'	Point accepted.	Amend B.7 as requested
226	B.7		3	Protected Species	Support		Support welcomed	
197	B.8		3	Non Identified Sites	The Trust supports policy		Support welcomed	
226	B.8		3	Non-Identified Sites	Support		Support welcomed	

CHAPTER 3 **T = TYPE** **1 - Objection** **2 - Omission** **3 - Support**

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
164	B.9		1	Information Accompanying a Planning Application	The policy is a matter of process more suitable for guidance notes rather than providing clear, rational and consistent basis for deciding planning applications	The policy should be re-drafted or deleted	Accepted	Delete Policy B.9
197	B.9		3	Information Accompanying a Planning Application	Support policy		Support welcomed. However, policy may need re-drafting in the light of representations from GOSW.	
226	B.9		3	Information Accompanying a Planning Application	Support policy		Support welcomed. However policy may need re-drafting in the light of representations from GOSW	
226		3.34	1	Trees and Hedgerows	Paragraph 3.34 should refer to hedgerow regulations and BS 5837		Accepted. However paragraph may need re-drafting in the light of representations from GOSW	Amend paragraph 3.34 accordingly
149	B.10		1	Trees and Hedgerows on Development Sites	An allowance has not been made for compensatory planting. In addition there appears no scope for the justified removal of species. The policy needs more balance.	Delete last sentence of policy	Accepted that more balance is needed. Other objectors concerns however, also need to be taken on board.	Amend policy B.10 accordingly.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
164	B.10		1	Trees and Hedgerows on Development Sites	The first 2 sentences of the policy relate to matters of process more suitable for guidance notes. The final sentence takes an inflexible approach in suggesting that in all instances the loss of important trees and hedgerows is inherently unacceptable.		Accepted policy will need to be re-drafted taking on board objectors concerns	Re-write B.10 accordingly
197	B.10		3	Trees and Hedgerows on Development Sites	Supports policy		Support welcomed. However policy may need re-drafting in the light of representations from GOSW.	
226	B.10		3	Trees and Hedgerows on Development Sites	Support		Support welcomed. However policy may need re-drafting in the light of representations from GOSW	
164	B.11		1	Tree Preservation Orders	The reference to 'guidelines and policies published in the City Councils Tree Strategy' is a matter of process rather than planning land use policy and is more suitable for guidance notes	It should be deleted from the policy	Accepted delete text	Amend policy accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233			2	New policy to require developers to provide a more generalised survey to identify all features not just trees (extension to policy B.10)	It is recommended that this policy is widened to require developers to provide a more generalised survey to identify all features, not just trees and hedgerows, that should be retained and protected as part of development proposals.		Para 3.33 Addresses most concerns raised by the objector. GOSW have suggested that its associated policy (B.10) is however removed. They have also suggested that B.10 be re-written.	B.10 changed in response to GOSW refer objector to para 3.33
226	B.11		3	Tree Preservation Orders	Support		Support welcomed. However policy may have to be re-drafted in the light of representations from GOSW.	
11	LCA.1		1	Development within Landscape Conservation Areas	Although the land is unusable by the public, it is welcome open space within an otherwise build up area.	Identify site as a Landscape Conservation Area.	This site was not identified by the independent landscape consultant who carried out a landscape assessment of the whole City.	No change
36	LCA.1		1	Development within Landscaped Conservation Areas	There is no justification for the designation east of Hempsted Lane.	Remove most of the designation.	This area forms an important contribution to the semi rural character of Hempsted Village and enables long distance views out towards surrounding countryside and should therefore be retained in an open manner. Independent landscape consultants re-surveyed the whole of the City and recommended this area for inclusion.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
93	LCA.1		1	Identification of Winneycroft Farm as Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft Farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide. To have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
113	LCA.1		1	Development within Landscape Conservation Areas	To remove all danger of or risk of from flood plain developments, whether or not developed or undeveloped it would be best to ban all/any commercial development within the floodplain areas. Those involving Landscape Conservation Areas and Flood management schemes being the exceptions.		Proposals within landscape conservation areas should not be exempt from floodplain policies if they are within the floodplain.	No change

CHAPTER 3 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
125	LCA.1		1	Identification of Winneycroft Farm as a Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure Plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft Farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide. To have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
126	LCA.1	3.39 - 3.42	1	Identification of Winneycroft Farm as Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide. To have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
127	LCA.1	3.39 - 3.42	1	Identification of Winneycroft Farm as a Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide. To have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
128	LCA.1	3.39 - 3.42	1	Identification of Winneycroft Farm as Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide. To have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
129	LCA.1		1	Identification of Winneycroft Farm as a Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide. To have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
147	LCA.1		1	Development within Landscape Conservation Areas	No justification for the oil pumping station at Hempsted to be included within the LCA		As preamble to the policy makes clear the whole of the City was surveyed by independent consultants. LCAs were identified utilising criteria as described at paragraph 3.40. Site dossiers are available as detailed at paragraph 3.41.	No change
164	LCA.1		1	Development within Landscape Conservation Areas	The policy should take a more flexible approach in encouraging diversification of the rural economy and to allow the farming community to manage the land in a way that benefits the wider rural economy		There is very little rural land in the administrative area of the City. What there is under great pressure for development.	No change
167	LCA.1		1	Development within Landscape Conservation Areas	Objects to LCA.1 insofar as it affects the areas designated within or adjacent to RAF Quedgeley site. Concerned at designation of proposed central square LCA whose quality is predominantly a function of its historic association with the former RAF use. This will materially change following redevelopment of the site. QUVL believe the designation of this LCA is therefore unnecessarily restrictive.	That the criterion in LCA1 be revised and the proposed Central Square LCA be deleted.	The criterion for designation are considered sound given the urban nature of the City. Utilising the criteria an independent consultant recommended a series of LCAs all of which have been identified within the proposals map.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
203	LCA.1		1	Development within Landscape Conservation Areas - Bodiam Ave	Planning permission exists on the site for the development of 350 houses on this site. LCA notation should be redrawn taking this into account.	Delete LCA notation from the committed housing area.	Detail of POS at time of drafting was not assured. At time of writing this was still outstanding however second deposit will be amended in line with objectors suggestion.	
203	LCA.1		1	Development within Landscape Conservation Areas	The policy would appear to be more restrictive than that which applies to landscapes of national importance namely AONBs.	Delete 'unless there are exceptional circumstances' from this policy.	The objective of AONBs is the conservation of the natural beauty of the landscape. LCAs have other functions for example the separation of development and the ability to provide green lungs in otherwise built up areas. It should also be borne in mind that the particular landscape qualities being protected are not as testing as would be the case for an AONB. In terms of the restrictive nature of development within AONBs that considered 'major' would not be permitted unless it is in the national interest, this is clearly not the sort of test required by LCA.1. The request to delete 'unless there are exceptional circumstances' is confusing as this adds a degree of flexibility that the objector appears to be seeking.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
205	LCA.1		1	Development within Landscape Conservation Areas	Objector concerned at the Councils identification of large tracts of land as LCAs which in their view have little regard to the landscape quality of those areas designated. In particular, contend that area to south of Hempsted Lane (as identified) has limited landscape value.	Deletion of the area south of Hempsted Lane (as identified) be deleted and the range of developments considered acceptable within the defined areas be broadened to reflect more accurately the advice within PPG7	Re-appraisal of all LCAs was undertaken by an independent consultant who confirmed the site to the south of Hemspted lane as being worthy of inclusion.	No change

CHAPTER 3 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
229	LCA.1		1	Land at Winneycroft Farm in the Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure Plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft Farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide. To have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
230	LCA.1		1	Land at Winneycroft Farm in the Landscape Conservation Area	Land at Winneycroft Farm makes very little contribution to the Special landscape Area. Land not worthy of protection by reference to structure plan policy can not deserve the same degree of protection at local plan level. Of 3 additional criteria only visibility is relevant to Winneycroft Farm. Visibility is not sufficient justification for a protective designation against a background of Structure Plan Policy and the previous inspector's comments	Omission of land at Winneycroft Farm from the Landscape Conservation Area	The second review of the Structure Plan has confirmed the importance that should be attributed to the area between 'Gloucester urban area and the Cotswolds, including Robinswood hill' There can be no question that Winneycroft Farm site is between the Gloucester Urban area and the Cotswolds. The local plan does not confuse strategic and local designations, the two not unsurprisingly coincide, to have another layer of designation at a Gloucester level would be confusing and achieve little. The previous inspector agreed with the City Council in that the loss of the vast majority of the site would conflict with Structure Plan policies. The City Council maintains that to fulfill the structure plan and local plan criteria the whole of the site should be designated.	No change
116	LCA.1		3	Development within Landscape Conservation Areas	Support for Landscape Conservation Areas at Hempsted		Support Welcomed	

CHAPTER 3 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
162	LCA.1		3	Development in Landscape Conservation Areas - land to south of Grange Road	Support proposed amendments to LCA as formulated by the Council's independent landscape consultants.		Support Welcomed	
226		3.43	1	Development and Flood Risk	This section should refer to recently published PPG25		Accepted, the Plan was drafted prior to PPG25. Revised deposit will need to take it on board	Amend accordingly
164		3.46	1	Development in Areas of Flood Risk	The text could usefully make reference to the draft PPG 25		Accepted. Revised deposit will take on board new PPG 25	Amend text accordingly
233		3.50	1	Undeveloped land in the floodplain	Re-phrase text.	Replace 'information' with 'Flood Risk Assessment'	Paragraph will be significantly changed taking on board PPG25.	Amend text accordingly
28	FRP.1		1	Undeveloped Land in the Floodplain	The policy should not permit any development in the floodplain regardless of conditions.	The policy should be amended so that no development will be permitted in areas at risk of flooding on undeveloped land.	This policy has been re-drafted in the light of PPG 25. This follows a risk based approach to development. This is clear that in undeveloped areas that are at a high risk from flooding, development should be wholly exceptional and limited to essential transport and utilities infrastrucutre.	Amend policy in line with PPG 25 this may address some of the objectors concerns.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
113	FRP.1		1	Undeveloped Land in the Floodplain	To remove all danger of or risk of from flood plain developments, whether or not developed or undeveloped land it would be best to ban all/any commercial development within the floodplain areas.		This policy has been re-drafted in the light of PPG 25. This follows a risk based approach to development. This is clear that in undeveloped areas that are at a high risk from flooding development should be wholly exceptional and limited to essential transport and utilities infrastrucutre.	Amend policy in line with PPG 25 this may address some of the objectors concerns.
122	FRP.1		1	Undeveloped Land in the Floodplain	Contributions should not be made for the maintenance of flood defences in perpetuity. This is contrary to advice in PPG 25 which advises a period of 30 years, after which the public purse should pay for subsequent maintenance.		Final draft of PPG 25 was not published until July hence its guidance will not have made it into policy drafted a few months earlier	Amend policy accordingly
148	FRP.1	3.49	1	Undeveloped Land in the Floodplain	Policy does not reflect guidance in PPG 25	FRP.1 should be re-drafted to include a sequential approach.	Policy draft pre-dated PPG 25. Entire redraft needed to reflect changes	Amend policy FRP.1 accordingly
149	FRP.1		1	Undeveloped Land in the Floodplain	Policy requires the maintenance of flood defence measures in perpetuity. This should be reduced to 30 years as advised in revised PPG25.		Policy draft pre-dated revised PPG 25. It is accepted that the policy will have to be re-drafted and take on board new guidance including a timescale of 30 years rather than perpetuity for on going maintenance.	That Policy FRP.1 be ammended accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
163	FRP.1		1	Undeveloped Land in the Floodplain	No reference made to the sequential approach as set out in revised PPG25	The policy should be re-written to state the risk based approach and the sequential test will be carried out when considering proposals for development in flood risk areas.	Accepted. Policy was drafted before publication of revised PPG 25. Policy should reflect changes as suggested by objector.	Amend accordingly
205	FRP.1		1	Undeveloped Land in the Floodplain	Policy creates an inappropriate presumption against development within areas at risk of flooding regardless of mitigation measures that may be provided which could satisfactorily address the issue of flooding	Delete criterion 1 of policy	Policy will need to be re-written in the light of recently published PPG25. This may address concerns of objector.	
233	FRP.1		1	Undeveloped Land in the Floodplain	PPG25 sets out a sequential test for new development within areas at risk from flooding. The local plan should make reference to the various categories of land and the sequential test applied to them.		Accepted, policy was drafted prior to publication of PPG.25	Amend text accordingly
143	FRP.1		3	Undeveloped Land in the Floodplain	Any future development should take account of the effect which it could have on flooding		Policy as drafted does ensure that development itself should not be flooded and that it should not lead to increase in flooding elsewhere. Policy will need to be updated however in response to revised PPG 25	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
162	FRP.1		3	Undeveloped Land in the Floodplain	There is sufficient land available to avoid development in existing floodplain areas		Support welcomed	
168	FRP.1 FRP.2		3	Undeveloped Land in The Floodplain & Allocated, Previously Developed Land in the Floodplain	The principles of draft policies are supported. Policy FRP.1 should be amended to make reference to the sequential approach.		Supported noted with thanks - Policy will need to be amended to take on board PPG 25 and the sequential approach.	
164	FRP.1 FRP.2		1	Undeveloped Land in The Floodplain & Allocated, Previously Developed Land in the Floodplain	The difference between undeveloped and previously developed land is accepted. However the potentially adverse effects of development on floodplains are similar regardless of status of the land. The 2 policies could usefully be amalgamated.	Suggested rewording "Proposals for development including the raising of land on the floodplains and washlands shown on the proposals map will not be permitted where they would. (a) materially impede the flow of water (b) increase the risk of flooding elsewhere (C) reduce the capacity of the washlands or (d) increase the risk of people of property from flooding."	The revised PPG 25 suggests a sequential approach to development within floodplains the policy will have to be redrafted to reflect these changes and should hopefully address the objectors concerns.	Amend text accordingly
200	FRP.1, FRP.2,		3	Development in Areas of Flood Risk	BW support the general principles set out with regard to floodplain policies		Support Welcomed	

CHAPTER 3 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
167	FRP.2		1	Allocated Previously Developed Land in the Flood Plain	Objectors draws attention to the possible implications of policy. If developers are required to make contributions to flood prevention and mitigation this may have adverse effect in the financial viability of redevelopment, especially given other constraints. Objector also raises question about whether on flood grounds alone the redevelopment of extensive areas of Monk Meadow for housing is actually appropriate.		Policy will be modified in line with advice in PPG.25 which will make it less onerous on developers. EA have not raised objection to redevelopment of Monk Meadow, and are currently developing a flood mitigation strategy with the City Council and land owners.	Policy to be redrafted in line with PPG.25
203	FRP.2		1	Allocated Previously Developed Land in the PPG 25 Flood Plain	The construction of flood defences can have significant environmental impacts on the natural and built environment and this should be taken into account in assessing the suitability of a site for redevelopment	add 'and provided that there are no resultant from such (flood defence) measures.	Accepted in principle unacceptable environmental impacts Gloucester is that any contributions will pay for a scheme of work which has already been identified and been subject to scrutiny with regard its environmental impact. Policy has been significantly changed with regard to PPG25 Support welcomed	Amend policy in line with however the reality in
209	FRP.2		3	Allocated Previously Developed Land in the Flood Plain	Respondent welcomes moves to protect the flood plain and policies encouraging the removal of obstacles within it.			

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233			2	Undeveloped land in the flood plain. Allocated, previously developed land in the flood plain	PPG 25 sets out a sequential test for new development within areas at risk from flooding. The plan should make reference to the various categories of land and the sequential test applied to them.		Accepted deposit draft written before publication of PPG25	Re-write flooding section of taking on board PPG 25
113	FRP.3		1	Obstacles in the Flood Plain	Any existing obstacles acting or adversely diverting water , especially when likely to add to the threat to flooding to residential properties should be removed to prevent that occurring.		We can not require the removal of existing structures in the floodplain, however we can encourage it and would support the Environment Agency in any proposals it has to remove obstacles subject to the constraints outlined in the policy,	No change
177	FRP.3		1	Obstacles in the Flood Plain	Before there is any proposal to remove restriction to floodwater flow in the Severn above Hempsted Landfill, flood defences downstream of the site should be increased because water flow downstream will increase.		There would be little point in transferring the problem downstream. Flooding downstream is caused by tidal events and involves huge amounts of water, any extra water flowing further downstream is minimal compared to the size and volume of the Estuary.	No change
209	FRP.3		3	Obstacles in the Flood Plain	Respondent welcomes moves to protect the flood plain, and policies encouragng the removal of obstacles within it.		Support welcomed	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233		3.53	1	Minimum Floor Levels	Re-phrasing of text	Replace 'within lower lying areas' with 'in areas at risk of flooding' And The last sentence to read as follows "The precautionary principle will be applied as there will always be a need to allow for a margin of error in each case, for example to take account of the effects of wind and tidal action on floodwater and to allow for the impact of climate change'	Accepted, amend text accordingly	
113	FRP.4		1	Minimum Floor Levels	Minimum floor levels will not be needed if there was no building in the flood plain		The policy will need to be re-drafted to take account of PPG 25. However there will still be the possibility of building in protected non-functional flood plains	Amend in accordance with PPG 25
122	FRP.4		1	Minimum Floor Levels	Requirement for 600mm pre-judges the risk assessment process as advocated in PPG25.	Policy and supporting text should demonstrate the consideration and interpretation of the guidance provided for in PPG 25.	Policy pre-dated PPG25 it will need to be amended accordingly.	Amend accordingly
164	FRP.4		1	Minimum Floor Levels	Although the principle of permitting development on floodplains is an appropriate matter for consideration within the development plan process, matters relating to floor levels and internal layouts are more appropriately dealt with by building regulations or SPG.	The policy should be deleted	The impact of this policy could significantly effect the external design of a proposal and will therefore need to be addressed at the planning application stage. The policy will need to be updated with regard to PPG 25 some of the objectors concerns therefore may be reflected in any redraft.	Text to be amended in line with PPG 25 though commitment to minimum floor levels maintained

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
168	FRP.4		1	Minimum Floor Levels	Policy should refer to PPG25 for the appropriate level of flood defence which may be 1 in 200 year in some areas.		Noted with thanks policy will need to reflect new PPG 25	Amend policy in line with PPG25
205	FRP.4		1	Minimum Floor Levels	Objector welcomes general approach in that it attempts to protect development against the risk of flooding - but would suggest that the detailed requirements of the policy are overly prescriptive		Policy will need to be re-written in light of recently issued PPG 25 this may address objectors concerns	
233		3.55	1	Maintenance of Water Courses	Supporting text and appendix could more clearly define the distinction between designated Main River and Ordinary Water courses. The appendix could make it clear it is not an exhaustive list of all main rivers and ordinary water courses		Accepted in part. The text should clarify the distinction between 'Main' and 'ordinary' water courses; amend text accordingly. Appendix 3 does list all water courses in the City of any worth. Small drainage ditches are not included as policy will not apply to them.	Amend paragraph 3.57 accordingly
66	FRP.5		1	Maintenance of Watercourses	Maintenance strip greater than 8 metres required adjacent River Severn	A maintenance strip for the western channel of the river Severn of width of the channel plus 16 metres	The Environment Agency who are responsible for the maintenance of the channel bank on main rivers have not requested anything greater than the 8 metres proposed.	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
113	FRP.5		1	Maintenance of Watercourses	Watercourses could either pose or add to the hazard of flooding in the Llanthony area.		Objective of policy is to ensure that water courses are kept free thus preventing local flooding due to channel blockage.	No change
122	FRP.5		1	Maintenance of Watercourses	The local plan should provide a clear definition as to what is considered a watercourse.		The water courses covered by the policy are listed in appendix 3.	No change
233	FRP.5		3	Maintenance of Watercourses	Comment on relationship with B.4		Comment welcomed	
233		3.56	1	Development adjacent to other water courses	It is unclear what is meant by 'other' water courses as previous policy refers to 'any' water course		Text amended due to PPG 25	Paragraph deleted as part of revision due to PPG 25
233		3.57	1	Surface Water Run Off	The agency does issue discharge consents, however the Council and Severn Trent also have a responsibility to deal with pollution in some instances.	The second sentence should be re-worded "Although polluting uses may be controlled in some instances." At the end of the paragraph the following sentence should be added. "There may therefore be a need to install appropriate safeguards through planning conditions on surface water drainage systems to prevent pollution occurring"	Accepted with slight modification to wording	Replace Although polluting uses will be controlled through licences issued by the Environment Agency with 'Although polluting uses may be controlled in some instances. At end of paragraph add the following ' Conditions may be attached therefore ensuring systems are installed that prevent pollution occurring'.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233		3.59	1	Surface water run off	Recommended that mention is made of recycling grey water as one of the elements of SUDS		Grey water recycling is considered more a demand management issue rather than a SUDS issue, hence its inclusion in policy FRP.7	No change
122	FRP.6		1	Surface Water Run Off	Policy should acknowledge the problems regarding the provision of SUDS in particular the adoption and maintenance of systems		The difficulty with adoption is acknowledged, the City Council has been active in promoting a solution to the problem. In terms of policy this is issue probably better expressed in the SPG	No change
149	FRP.6		1	Surface Water Run Off	Developers would embrace the opportunity to incorporate SUDS however, it is practically impossible to get these systems adopted.		The difficulty with adoption is acknowledged, the City Council has been active in promoting a solution to the problem. In terms of policy this is issue probably better expressed in the SPG	No change
197	FRP.6		1	Surface Water Run Off	The trust supports the principle of the policy however feels it is unnecessarily weak and could be strengthened.	Amend text to read "Permission will not be granted to any development proposal that would unacceptably affect the water environment, including surface waters, ground water levels and resources. Development proposals should incorporate the principles of SUDS into the scheme"	Accepted in part.	delete 'of large sites'

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
215	FRP.6		1	Surface Water Run Off	SUDS is appropriate to all sites and the aim should be to expect all development to use SUDS not only large sites.	FRP.6 to read: 'Developers will be required to adopt the SUDS approach to drainage on all sites unless it can be demonstrated that it is inappropriate.....	Accepted policy should not just apply to large sites	Delete 'of large sites' from second sentence of FRP.6
226	FRP.6		1	Surface Water Run Off	Welcomes promotion of SUDS, however believes policy should be strengthened.	Planning permission for any development proposals will not be granted if it would adversely affect the water environment, including groundwater and surface water. Development proposals should incorporate an appropriate Sustainable Drainage System	Agreed in part. Policy should cover all development	Delete 'large sites'
233	FRP.6		1	Surface Water Run Off	Recommends that all developers, not just of large sites should address the principles of SUDS		Accepted, amend policy accordingly	Delete 'of large sites'
200	FRP.6		3	Surface Water Run Off	BW supports the general principles of floodplain policies. We welcome the promotion of Sustainable Urban Drainage Systems as set out in Policy FRP.6 and the treatment of this issue further through SPG		Support welcomed	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233		3.61	1	Water Supply - Demand Management	The supporting text should refer to the Gloucester and Sharpness Canal which provides drinking water for Bristol and should not therefore be polluted. The text should also refer to the need to install fittings and fixtures that will minimise water use and reduce costs the environment and consumer.		The policy concerns problems with abstractions and not water pollution, these issues are dealt with under surface water run off. Second part of objection is however accepted. At end of paragraph 3.61 add 'House builders especially can help mitigate the problem by installing as part of their development fixtures and fittings that use water more efficiently'.	Amend paragraph 3.61 accordingly
233	FRP.7		1	Water Supply	Current wording is vague	Replace developers may with developers will	May is used rather than will as it hinges on whether or not the EA deem measures are necessary.	No change
197	FRP.7		3	Water Supply	The Trust supports this policy		Support welcomed	
226	FRP.7		3	Water Supply	Supports policy		Support welcomed	
53		3.63	3	Renewable Energy	Welcome inclusion within plan of section on renewable energy		Support welcomed	
53		3.64	1	Renewable Energy	Definition of renewable energy should be the same as PPG 22		PPG 22 is 9 years old the definition it uses includes sources of energy which are finite and therefore can not be seen as renewable. Description in the deposit draft is in concordant with that in the Structure Plan.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
53		3.65	1	Renewable Energy	Do not agree that all renewable installations can have significant visual impact	delete from plan	Accepted	Delete paragraph 3.65
53		3.66	1	Renewable Energy	Whilst current pricing mechanisms are an important factor this may change over the plan period.	Suggest first part of paragraph deleted	Agreed government policy may change	Delete paragraph 3.66
53		3.67	1	Renewable Energy	The Plan should not presume that commercial collectors for solar energy will not come forward over the plan period	Delete first sentence	Assume objector is referring to second sentence. Agreed technology may move rapidly making commercial collectors viable. Delete 'solar collectors. It is unlikely that over the plan period that commercial collectors will be installed, however there is a vast potential for' and add solar after 'own'	Amend paragraph accordingly
53		3.69	1	Renewable Energy	Waste is regarded as a renewable energy source	Delete paragraph	Statement adds nothing that is not covered in paragraph 3.64 therefore delete	Delete paragraph 3.69
53	FRP.8		1	Renewable Energy	FRP.8 as written is not a statement of planning policy and should be relegated to supporting text	An appropriate policy which provides clear guidance about the circumstances in which proposals for renewable energy developments will be permitted.	Agreed in part policy needs to be more focused and reflect the PPG	Amend policy accordingly
149	FRP.9		1	Light pollution	Part 3 of this policy is considered extraneous and more suited to development control		Although quite detailed it does give a useful context in which to make DC decisions	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
113	FRP.10		1	Noise	Before allowing new developments, the City Council should take positive steps to improve the living conditions of Llanthony residents, presently suffering from the effects of previously granted planning permissions		Breaches of planning condition and of Section 106 agreements are pursued. The local plan is not a mechanism to revoke or enforce existing planning consents.	No change
149	FRP.10		1	Noise	This policy should allow for sensitive development in noisy areas, if new proposals can be designed to mitigate the effects of the noise generator		Accepted, extend policy supporting measures that permanently mitigate the source of disturbance	Amend policy FRP.10 accordingly.
164	FRP.10		1	Noise	The third paragraph relates to matters of process. The amelioration of adverse noise impact by the imposition of conditions and the matters more appropriately dealt with by Building Regulations.	The paragraph should be deleted or redrafted.	Building regulations provide a level of protection. They do not take into account for example the vulnerability of a neighbouring use to noise generated by a development. Accepted however that the policy may need re-drafting with elements of it being in supporting text.	Relegate third paragraph to text.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233		3.75	1	Other Pollution	Recommends that the role of the Council's Environmental Health Department who deal with emissions, pollution and contaminated land is referred to in the text. The text should also make reference to the necessity of including appropriate planning conditions to prevent pollution and to remediate contaminated land		Accepted in part. Include reference to Environmental Health Section	Amend paragraph 3.75 accordingly
113	FRP.11		1	Pollution	Before allowing new developments, the City Council should take positive steps to improve the living conditions of Llanthony residents, presently suffering from the effects of previously granted planning permissions		Breaches of planning condition and of Section 106 agreements are pursued. The local plan is not a mechanism to revoke or enforce existing planning consents.	No change
163		3.76	1	Lack of statement on natural sewage treatment systems	A new paragraph could be added regarding the installation of natural sewage treatment systems such as reed beds		Accepted as the plan progresses use of this technology will inevitably increase. Insert new paragraph after FRP.14	Amend text accordingly

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
34	FRP.12		1	Sewage Works Cordon Sanitaire	All flows and treatment is being diverted to Netheridge. This process will finish by early 2002. The cordon sanitaire is therefore no longer unjustified.	Remove the cordon sanitaire.	Paragraph 3.77 is clear - when the works do close the part of the policy relating to Longford will no longer apply.	No change
168	FRP.12		1	Sewage Works Cordon Sanitaire	There is no scientific or planning basis for the two cordon sanitariums which seem to be defined by reference to physical boundaries on the ground rather than any analysis of wind borne dispersal from the sites. There has been no study examining the degree to which sites within the area are adversely and demonstrably harmed by smells from the Netheridge sewage disposal works and Longford Works.	Policy be deleted until further investigation of the impact if any of the two works upon neighbouring land uses, has been properly investigated.	As to whether or not there is a planning basis for the policy- it was discussed at the 1993 Inquiry into the previous local plans. In his report the inspector stated " Policy PU.1(f) imposes a restriction on other development as a result of smell from treatment works to my mind it is manifestly a land-use policy" With respect to scientific basis we are not in receipt of any reasoned justification indicating that the area should be changed.	No change
205	FRP.12		1	Sewage Works Cordon Sanitaire	While accepting there is a justification for a degree of control over development, the objector is concerned at the size and scope of Sewage Works Cordon sanitaire defined on the proposals map surrounding Netheridge Treatment works.	That the cordon sanitaire be re-defined to reflect more accurately the area within which development may be affected by the sewage works	This issue was debated at the last Local plan Inquiry back in 1993. The inspector concluded then that the area as proposed by the City Council with input from Severn Trent was appropriate. We are not in receipt of any reasoned justification indicating that the area should be changed.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
149	FRP.13		1	Phasing of development requiring sewage capacity	It is unreasonable to restrict new development due to the failure of a statutory undertaker to adequately service new streams		Policy is roll over from 1996 adoption draft. There have been no reported problems with it's implementation.	No change
233		3.80	1	Contaminated land	The text should also refer to the responsibilities of Environmental Health Department with regard to contaminated land issues. The text commencing 'Developers should liaise..' would benefit from strengthening to state that developers must consult the EA and Environmental Health when considering proposals on contaminated sites and make it clear that subsequent planning applications will be referred to the EA.		Accepted. Second and third sentence of paragraph 3.80 to read as follows:'Developers should consult the Environment Agency and the City Council's Environmental Health Section prior to submitting a planning application to establish the need for studies to be undertaken into potential effects on water resources and other receptors. Any subsequent planning application will be referred to the Environment Agency for their comments.'	Amend paragraph 3.80 accordingly
117	FRP.16		1	Telecommunications	Para. 1 of Policy FRP.16 - replace transmission or receipt with transmission and receipt. Supporting text should take into account the connectivity between transport and telecommunications.		Accepted 'or' to be replaced with 'and' in first paragraph of policy FRP.16. Reference to connectivity will add little as to whether or not a proposal is acceptable or not.	Ammed FRP.16 accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
164	FRP.16		1	Telecommunications	The need to facilitate telecommunications development needs to be balanced against the protection of the appearance of the urban and rural environment and residential amenity. Criterion 1 should reflect this emphasis.		Accepted policy should be redrafted to reflect these wider concerns. Insert 'residential' before amenity on point 1 .Add 'and the appearance of the wider urban and rural environment. At the end of point 1'	Amend policy accordingly
168	FRP.16		1	Telecommunications	The policy should be amended to reflect the fact that it relates to masts which exceed 15m in height as described in paragraph 3.83 of the reasoned justification		The Policy begins 'planning permission will be granted'. Masts under 15 metres do not need planning permission (as stated in paragraph 3.83) so a mast under 15 metres will not normally need permission from this authority therefore the policy will not apply.	No change
220	FRP.16		1	Telecommunications	Policy fails to identify existing sites and so encourage new developments towards existing telephone installations	Development of mast register	We do have a register of consented and notified masts. This is currently being transferred to an electronic format to make it more accessible. This facility should be identified in the text.	Amend text to add new paragraph after FRP.16

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
138	FRP.16 FRP.17	3.85, 3.86	1	Telecommunications - no sites identified	FRP.16 and FRP.17 fails to identify existing sites and so encourage new developments towards existing telecommunications installations. FRP. 17 is overly cautious and misleading. Radiation is a safety matter for the Health and Safety Executive.	Development of a mast register. Deletion of FRP.17	We do have a registrar of consented and notified masts. This is currently being transferred to an electronic format to make it more accessible. This facility should be identified in the text. The point on FRP is accpeted policy and text will be ammended accordingly Support welcomed	Add new paragraph after FRP.16
151	FRP.16		3	Telecommunications	Support FRP.16			

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Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
220	FRP.16		2	Identification of existing telecommunications facilities.	Policy fails to identify existing sites and so encourage new development towards existing telephone installations	The proposals map fails to identify and so encourage new development towards existing telecommunications facilities. In addition policy needs to be changed as follows; Planning permission will be granted for the installation of external apparatus necessary for the transmission or receipt of telecommunications, provided that: 1. The siting and appearance of apparatus, including any location or landscape design requirements, have been designed to minimise the impact of such apparatus on amenity. 2. Installations are sites so as to minimise their effect on the external appearance of the building on which they are installed. 3. Applicants have proved that they have fully explored the possibility of utilising existing apparatus and masts, as shown on the proposals map and maintained on a separate up-dateable register by the council particularly for accommodating new large scale requirements; and that other suitable buildings or structures can be used 4. Applicants who propose to install a mast have considered the need to include additional structural capacity to take account of the growing demands for network development, including that of other operators.	It would be impossible to identify all sites on the proposals map. The City does however have a registrar of consented masts. This is currently being transferred to an electronic format to make it more accessible. This facility should be indentified in the text.	Amend text to add new paragraph after FRP.16

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
220		3.85, 3.86	1	Telecommunication Health and Safety Issues	Health and safety is an issue that is a matter for the Health and safety executive. Believe that para 3.85 and 3.86 should be modified	Para 3.85 and 3.86 should be amended as follows' Scientific research on health implications of telecommunications development is currently inconclusive. The City Council will therefore ensure that any telecommunications proposal fully complies with the relevant ICNIRP guidelines.	Given the revised publication of PPG8 and recent case law the above is accepted in principle	Amend Paragraph 3.85 accordingly
117	FRP.17		1	Telecommunication Installations Close to Other Buildings	Policy is inequitable, unsustainable and contrary to existing and emerging government policy.		Given the revised publication of PPG8 and recent case law the objection is accepted in principle	Delete FRP.17
138	FRP.17		1	Telecommunication Installations Close to Other Buildings	Policy overly cautious and misleading. Safety is a matter for the Health and Safety Executive and duplication of roles should be avoided.	Policy should be deleted	Given the revised publication of PPG8 and recent case law the above is accepted in principle	Delete FRP.17
151	FRP.17		1	Telecommunication Installations Close to Other Buildings	25 metre requirement is contrary to Government guidance	Policy FRP.17 be deleted in its entirety.	Given revised PPG8 and recent case law the above is accepted in principle	Delete FRP.17

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
168	FRP.17		1	Telecommunication Installations Close to Other Buildings	<p>Accept that health considerations and public perception and concern regarding these can be in principle material considerations. In the light of this the Government asked NRBP to set up an independent expert group on mobile phones. Their report in respect of base stations concluded that there is no general risk to health of people living or being near base stations on the basis that exposures are expected to be small fractions of the guidelines. It acknowledges that biological effects may occur but considers these very subtle and that there is as yet little consistent or reliable evidence of the mechanism, magnitude of harmful impact.</p> <p>Government accepts that emissions from base stations should meet the guidelines of the Internal Commission on Non-Ionising Radiation Protection (ICNIRP) for public exposure. The Minister for Housing Planning and Construction wrote to all councils indicating that until new</p>		<p>Given the revised publication of PPG8 and recent case law the objectors point is accepted in principle</p>	Delete FRP.17

guidance is introduced
where a development meets
ICRNP guidelines, the
health effects should not be
considered further.
Therefore since radiation is
a matter for the Health and

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
220	FRP.17		1	Telecommunication Installations Close to Other Buildings	Safety Executive, there is no requirement for the draft policy to duplicate other statutory measures of control. Objector considers FRP.17 to be overly cautious and misleading. Radiation is a matter for the Health and Safety Executive.	Suggest that policy is deleted	Given the revised publication of PPG8 and recent case law the above is accepted in principle	Delete FRP.17

CHAPTER 3 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
166		3.87	1	Waste Disposal	<p>The City Council has a responsibility to support the County Council in its efforts to achieve a sustainable approach to waste management rather than simply passing the buck to the County Council. The City Council can support the aims of the WLP to allocate suitable sites for waste management facilities, and by ensuring that other forms of development do not conflict with the need to develop waste management facilities close proximity to this large centre of population.</p>	<p>Paragraph 3.87 should be extended to incorporate the statements of fact given in the representation and there should be an expression of support for the aims of the Waste Local Plan, including confirmation that sites proposed for waste management facilities will be protected from other forms of development, either on or adjacent to the site, which may conflict with the aims of the WLP.</p>	<p>GOSW has indicated that Waste issues should be addressed in the Waste Local Plan. The majority of the references to waste therefore will be deleted. The sites identified in the WLP could be included as industrial locations however, this may well add to their value and result in them being lost to waste uses. The point about the ensuring waste management services and other forms of development do not conflict is well. As such no housing or other sensitive uses are proposed close to any of the sites put forward in the WLP. The housing allocation H.2.8 (Oil storage depot Hempsted) only provides for housing on the Hempsted Lane frontage, the area to the rear closer to the landfill site and WLP allocation is to be maintained in an open manner and some of the oil depot infrastructure removed.</p>	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
166		3.88	1	Waste Disposal	Objection to the paragraphs contained in this section containing a number of inaccuracies and mis-conceptions	Delete first sentence of paragraph 3.88. Delete 'or indeed removal from the tip' from the final sentence	Accepted, given representations from GOSW much of text will be deleted anyway.	Delete paragraph 3.87 and 3.88.
66	FRP.18		1	Expansion of Sud Meadow Tip	Existing landfill site should not be used for waste disposal. If removal of tip is a contemplated then the material should be used for the building of the SW bypass.	Accommodation of Sudmeadow Tip in the future with a proper SW Bypass completed in a 100 years time.	The site already has consent for landfill. Recoverable hard core etc is recycled at the site. The vast majority of the tipped material is unsuitable for use in construction. Policy to be deleted anyway	Delete policy
163	FRP.18		1	Expansion of Sud Meadow Tip	Appears to be a waste disposal policy		Accepted	Delete Policy
164	FRP.18		1	Expansion of Sud Meadow Tip	Policies on waste treatment and disposal are more appropriately contained within Waste Local Plans and need not be duplicated in Local Plans.	The policy should be deleted	Accepted	Delete policy
166	FRP.18		1	Expansion of Sud Meadow Tip	Re-instatement of the traditional floodplain would require removal of the landfill. This is not an environmentally sustainable option in that there are no alternative disposal facilities for such a large volume of waste		Accepted given comments of GOSW policy will be delted anyway.	Delete policy FRP.18

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers	Recommendation
233	FRP.1		1	Extent of flood plain on proposals map.	Central Gloucester proposals map does not accurately reflect extent of floodplain		Plan is based on information supplied by the agency. If there is more up to date information then we would be pleased to include it	No change
131			2	New policy on designating land as green belt to the east of Elmbridge Court	Land to east of Northern bypass in the vicinity of Elmbridge court should be designated as Green Belt. This would provide a clearly defined boundary, consistent with the approach taken elsewhere along the edge of the City Boundary.		While understanding the reasoning behind the representation the whole area concerned is highway land and can reasonably be excluded from the Green belt given that there is no developable land.	No change
97			2	The protection of underground services	There is no reference to the protection of underground services such as oil pipelines.	New policy giving protection for underground services like oil pipelines	Accepted new policy and preamble needed taking on board objectors concerns	Add new policy FRP.19 and pre-amble
141			3	Chapter 3 Natural Environment	Agree with policies concerned with attaining sustainability		Support welcomed	

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CHAPTER 4 - Built Environment

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
141		4.3	1	Aims of the chapter and criteria for the layout, circulation and landscape of new development	Concerned at possibility of further development of pedestrian priority in city centre at expense of cyclists as indicated in bullet points. May be some conflict with criteria of BE.4..	None stated.	Paragraph 4.3 sets out some examples of City Council initiatives to support and implement its broader economic and environmental priorities. The points made are not intended to be an exhaustive list. The wider plan seeks to improve the integration of cyclists and pedestrians throughout the city not simply within the central area. BE 4 sets out a number of criteria to be met by new development, again with an emphasis on the integration of cyclists and pedestrians. An integral part of pedestrian priority schemes is the provision of cycle parking facilities at the entrances to each scheme.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	BE.1		1	Scale, Massing and Height	<p>Urban sprawl will engulf Gloucester and Gloucestershire unless other than historic Gloucester is essentially rebuilt to a minimum of 6 storeys preserving a green belt more or less as existing around the city.</p> <p>Gloucestershire will become like the south east of England.</p> <p>It should be tall urban islands in a sea of green, where in future the inhabitants could go out and harvest red grapes, apples etc.</p> <p>Housing has been dumped at Gloucester conurbation during recent decades.</p> <p>Developers have had and are having a field day at Gloucester.</p> <p>The last 50 years have been a catalogue of mistakes.</p>	<p>Forethought and a 250 year masterplan.</p> <p>Give the developers a one-way ticket to France or the North of England.</p> <p>A time interval of 100 years before the rebuilding of Gloucester exceptionally mainly to 6 storeys in terraces within which the number of additional dwellings supplied lags far behind the number of additional dwellings stipulated.</p> <p>A time interval of 100 years when additional dwellings are built in northern counties instead of in Gloucestershire after which Gloucester can return the kindness .</p> <p>Government GCHQ should have been rebuilt in north of England so that 5000 fewer houses required in Gloucestershire.</p>	<p>The objector promotes the development of high rise schemes throughout the city, which takes no account of the need to maintain interest and good design by the context set by existing buildings. The reliance on high rise would fail to create the variety of scale massing and height needed to promote good urban design within the city.</p>	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
36	BE.2	4.11	1	Views and Skyline	The policy does not specify particular views that require protecting.	More explanation of policy; particular views need specifying.	The supporting text is clear as to the views that are considered worthy of protection, and states that the details of both views and corridors will be set out in Supplementary Planning Guidance in due course. The publication of SPG will involve a public consultation exercise when the objector will have the opportunity to consider the details and have its points addressed. It is acknowledged that until such time as this exercise is carried out, the policy will carry less weight than it would afterwards when there has been the opportunity to test the detail.	No alterations proposed.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.3		1	Development Framework	Should not place emphasis on landowners/developers to jointly commission development frameworks. It is the Councils responsibility to facilitate and encourage development.	Not stated. Assume delete Policy BE3	Agree that it is the City Councils responsibility to facilitate and encourage development within its administrative area. Given this, it is appropriate for the Council to encourage, rather than require the unilateral provision of a brief.	Amend Policy BE3 to read: "Where large or significant sites that are adjacent to each other are to be developed separately by different owners, the City Council will encourage the preparation of a development framework for the combined sites. This framework may be jointly commissioned by the adjacent owners to ensure an appropriate level integration of design, layout, appearance, roads, footways, cyclepaths, natural and other boundaries, services and infrastructure. The framework should normally form part of the submission of an outline planning application."

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.3		1	Development Framework	Policy relates to process matters more suitable for guidance notes rather than providing a clear, rational and consistent basis for deciding applications for the development and use of land.	Redraft policy or delete (PPG12).	Disagree. The policy relates to the use of land and addresses an increasingly common issue, i.e. the disposal of adjoining sites by different owners and the need, in the interests of the proper planning of an area to promote a comprehensive scheme for its redevelopment.	No change.
167	BE.3		1	Development Framework	Policy is unrealistic and unnecessary and may result in significant delays to planning process for major developments necessary to meet strategic requirements.	Delete policy.	Disagree. The Policy identifies the need for a comprehensive approach where more than one site is being brought forward by different owners. In the interests of the proper planning of such areas a development framework and masterplan must be a prerequisite to any application. Only in such a way can the necessary integration of infrastructure and possible phasing be identified and agreed.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122		4.13	1		Objects to statement that private space should normally be located to the rear of a dwelling. Has no regard to individual character design and traditions of local areas, only seeking to impose unnecessary constraints on design of residential developments. Has no basis in Government guidance.	Not stated. Assume remove reference from text.	Disagree. Paragraph 4.13 refers to the contribution of new development to the re-creation of traditional buildings, streets and spaces. The objection itself refers to "the individual character, design and traditions of local areas" Both points of view firmly point to the traditional location of private space at the rear of dwellings.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.4		1	Criteria for the Layout, Circulation and Landscape of New Development	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.4		1	Criteria for the Layout, Circulation and Landscape of New Development	Does not emphasise that priority should be given to those accessing developments by means other than car. It should not be acceptable for pedestrians to walk across a huge car park to get to a store etc.	Add requirement to give priority to pedestrian/cyclist access to developments rather than car drivers. Car parking to be given low profile.	Disagree. The policy identifies 3 criteria that relate specifically to the needs of pedestrians, cyclists or the disabled, which suggests implicitly the priority afforded to these groups rather than the car.	No change.
164	BE.4		1	Criteria for the Layout, Circulation and Landscape of New Development	Criteria 3, 7 and 11 are vague and lack clarity.	Redraft to clarify how they should be interpreted or delete.	Disagree. The criteria listed are considered to be clear and concise.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.5		1	Community Safety	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.5		1	Community Safety	Policy conflicts with FRP9 (Light Pollution) on a number of points.	Both policies should be re-examined for duplication, repetition and conflict.	Both policies have been reviewed and reveal no instances of duplication, repetition or conflict. FRP 9 deals with light pollution whilst BE5 looks at community safety including the use of lighting to deter crime and the fear of crime.	No change.
122	BE.6		1	Access for All	Policy inappropriate. Part M of Building Regulations refers. Should not duplicate Building Regulations.	Delete policy.	Point acknowledged, but the Policy goes beyond Part M of the Building Regulations. Part M addresses internal circulation and access within the curtilage and from car parks, but does not address the provision of suitable car parking. In a Note attached to Part M it is stated that "Location and arrangement of dwellings on the site is a matter for planning,..."	Amend Policy BE6 by the deletion of ""both within the buildings and" Amend paragraph 4.15 by adding at the end "The Building Control Body will ensure that the Building Regulations are complied with within the building and external access to dwellings."

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.6		1	Access for All	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.7		1	Architectural Design	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.7		1	Architectural Design	Repetition of earlier design policies such as BE2. Level of detail is onerous for areas outside Conservation Areas. Development Control matters.	Delete policy.	Disagree. BE7 seeks to establish a number of urban design good practices as criteria in drawing out local distinctiveness in development proposals. BE2 on the other hand seeks to address the issue of the impact of development on the city skyline and views into and out of the city.	No change.
122	BE.8		1	Energy Efficient Development	Energy efficiency is a matter for Part L of the Building Regulations, not the Local Plan.	Delete policy.	Disagree. Part L of the Building regulations relates to conservation of fuel and power within buildings. This policy and its accompanying text (paragraph 4.17) is aimed at the encouragement of energy efficiency through layout and other features although it is acknowledged that this is not totally clear. The policy needs amendment to reflect this.	Amend Policy by the deletion of "and constructed" and insertion of ", through siting, orientation and layout" after "in a way that"

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.8		1	Energy Efficient Development	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -"Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.8		1	Energy Efficient Development	Policy should only be concerned with matters that are in the scope of planning control - siting and orientation of development. Building Regulations are the appropriate legislative regime for promoting energy conservation in the design and construction of new development.	Policy should be redrafted.	Acknowledge. See response to Objection 122.41.	Redraft policy to read: "The City Council will encourage new development to be designed in such a way that, through siting , orientation and layout , minimises its energy consumption.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.9		1	Criteria for Large Commercial Development	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -"Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	BE.9		1	Criteria for Large Commercial Development	Policy does not define large commercial development. Heading "Large Scale commercial land city centre development" is unclear and inconsistent with the actual wording and approach set out in the policy.	Define what is intended by "large scale".	It is not considered appropriate to be prescriptive about the meaning of large scale. What might be interpreted as large scale within the city may be viewed as small scale elsewhere, and vice versa. Each case will be assessed on its merits and the applicant advised accordingly either at the time of submission or within pre-application discussions.	No change.

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Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.10			1 Criteria for development in the commercial core of the centre.	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.10			1 Criteria for development in the commercial core of the centre	Criterion 6 -(protect/enhance views of Cathedral/historic landmark buildings) is a repetition of Criterion in BE2.	Delete Criterion 6.	Disagree. The two criteria illustrate two aspects of the problem. BE2 addresses the issue of protection of long vistas to and from the city, whilst criterion 6 of BE10 looks at the protection and enhancement of views from development within the commercial core of the city. Additionally it seeks to extend this protection beyond the cathedral to "other historic landmark buildings."	No change.
96	BE.11			1 Shopfronts, Shutters and Signs	Good quality traditional shopfronts make a valuable contribution to the character of the city and should be retained where possible.	Add: "There will be a presumption in favour of retaining good quality traditional shopfronts where they make a positive contribution to the character of the area and are capable of repair"	Agree.	Add as criterion 1 "There will be a presumption in favour of retaining good quality traditional shopfronts where they make a positive contribution to the character of the area and are capable of repair", and renumber following criteria

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.11		1	Shopfronts, Shutters and Signs	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.11		1	Shopfronts, Shutters and Signs	It is not necessary to demonstrate the need for external security measures. Criterion 3 should restrict itself to consideration of the visual impact of such development. The second sub-criterion is a matter more appropriately considered within supplementary planning guidance (see para 4.20).	Criterion should be redrafted.	With regard to need in criterion 4 it is accepted that this may not be an accepted material consideration and that the criterion should be redrafted. Criterion 3 is considered to address the visual impact of the development of adverts, signs and notice boards. The second sub-criterion mentioned is assumed to be within criterion 4 and is acknowledged to be more appropriate for inclusion within Supplementary Planning Guidance.	Redraft criterion 4 to read: "Proposals for external security measures on shopfronts will only be approved where the proposal harmonises with the shop front and the appearance of the street scene"

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.12	1		Landscape Schemes	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -"Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.12		1	Landscape Schemes	Unnecessary and deals with Development Control issues.	Delete policy.	Disagree. PPG 12 states at 5.15 "...These policies may include development control policies...The precise level of detail is a matter fro local decision,..... " As such the policy is entirely consistent with Government advice, provides the potential applicant with the advice needed and the city as Local Planning Authority with the necessary form of control..	No change.

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Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.13	1		Landscape Strategy	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.13	1		Landscape Strategy	Requirement to provide a Landscape Strategy relates to process matters more suitable for guidance notes rather than providing a clear, rational and consistent basis for deciding applications for the development and use of land.	Delete policy (PPG12).	Disagree. The provision of a landscape strategy in such applications is fundamental to the determination of such applications and the encouragement of quality schemes.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.14		1	Native Species in Planting Schemes	Requiring the use of native species is contrary to objectives of PPG12 and Circular 1/97.	Delete policy.	Disagree. The use of native species is an objective in the Biodiversity Action Plan for Gloucestershire. Planting schemes in new developments present an ideal opportunity to increase the use of native species within the city.	The policy and text should be amended rather than deleted, to read: "Where appropriate, the use of native species in planting schemes will be required." Paragraph 4.24 - "The use of native species in new planting schemes, particularly species that are indigenous to the Vale of Gloucester, will help to increase biodiversity in the city. Using local species means:-they grow better as they are adapted to the local climate,-they will suit their local context,(e.g. urban edge sites),- they support significantly more species of fauna. Us of seed and plant stock of local provenance will also be encouraged"

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.14		1	Native Species in Planting Schemes	Policy inappropriate, impractical and provides little to assist the Development Control process, as required by PPG12. Requiring the use of native species seems counter to objectives of PPG 12 and Circular 1/97	Delete policy		

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.14		1	Native Species in Planting Schemes	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.14		1	Native Species in Planting Schemes	Use of the word "normally" detracts from the clarity of the policy. Policy should "seek" rather than "require" the use of native species.	Policy should be redrafted or deleted (PPG12).	Disagree. The use of native species is an objective in the Biodiversity Action Plan for Gloucestershire. Planting schemes in new developments present an ideal opportunity to increase the use of native species plants in the city.	Redraft Policy to read: "Where appropriate, the use of native species in planting schemes will be required."

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.15		1	Provision of Open Space in Major Development	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -"Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.
28	BE.15		3	Provision of Open Space in Major Development	Green public open space is required to break up the density of housing, improve appearance and provide space for people to walk, mix and exist communally.	None stated	Support welcomed.	N/A

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.16		1	Provision of Public Art	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change,

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.16		1	Provision of Public Art	Major development should not be required to provide public art. Residential developments are not necessarily publicly frequented areas, as such, contributions to public art would be questionable. Policy is vague and imprecise. Policy more appropriate to major commercial, retail and other large developments.	Plan should be amended to exempt residential development for the provision of public art.	Disagree. New areas of housing should be designed to add character to their locality. Provision of public art can contribute to this by creating a sense of place and improving legibility of housing areas. Public art adds to local distinctiveness and can help to encourage community ownership and pride of place.	No change proposed.
65	BE.17		1	Criteria for Large Scale Residential Development	Policy should refer also to access to major developments by any and all modes of transport.	Criteria within the policy should be amended to consider all means of access to the sites by all modes of transport including public transport, cycles and on foot.	Policy BE 17 is specifically aimed at the design principles involved in the development of large-scale residential developments.. As such it is considered an inappropriate vehicle for the objection as lodged. Further, there are a number of policies, particularly within the Travel chapter, which combine to address the issues raised by the objector.	No amendments proposed.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	BE.17		1	Criteria for Large Scale Residential Development	<p>Large scale residential development in massive future variable multipurpose 1000 year life tower blocks initially for 50 to 100 years at Railway Triangle and St. James Station, Cheltenham before becoming workplaces at global centres of cities and of local railway network.</p> <p>Large scale residential development in massive future variable multipurpose 1000 year life warehouses same height as existing warehouses near docks and canal before becoming workplaces etc. near docks hinterland an inland port on a lifeline on an industrial canal from London through the Cotswolds to the Midlands 100 years from now.</p>	<p>Fulfilling dwellings imposition before rebuilding existing Gloucester exceptionally to 6 storeys in terraces mainly in stages of a 250 year master plan and to save Gloucester's heritage the surrounding Gloucestershire countryside.</p>	<p>address the content of the policy which sets out design criteria for large scale residential development. Instead it seeks to promote the development of tower blocks at the Railway Triangle and a site in Cheltenham.</p>	<p>The objection fails to No change.</p>

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.17							
		1		Criteria for Large Scale Residential Development	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -"Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.17		1	Criteria for Large Scale Residential Development	<p>Criterion 6 - private rear gardens - matter of detailed design and should not unreasonably restrict innovative housing layout design.</p> <p>Criterion 7 - defensible space at front of properties - conflicts with proposals for high density-PPG3 compliant back of footpath schemes.</p> <p>Criterion 8 - private spaces gated for security - Extraneous, Development Control matter. Could be poor design. Would be negotiated under Secured by Design.</p>	Not stated.	<p>The Policy is headed Design Criteria and as such it would be reasonable to expect consideration of detailed design. The criteria the subject of this objection address in some way the provision and design of private space either at the front or rear of a property. The addition of the phrase "or a variation is agreed" within the introduction to the policy as a result of the response to Objection 167.22, provides the flexibility sought to enable "innovative housing layout design" and high density proposals.</p>	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
155	BE.17		1	Criteria for Large Scale Residential Development	Large scale is not defined. Criterion (3) relates to housing but appears to seek a "mix of uses that support sustainability."	Delete criterion 3.	Acknowledge that criterion 3 appears to be inconsistent referring as it does to mixed uses. However given that the large scale residential allocations within the plan are in larger scale mixed use allocations developments, then this criterion is considered to be consistent. Large scale is not defined because it is considered unnecessary to be too prescriptive. Each case will be assessed on its merits and the applicant will be advised during the course of any pre-application discussions or at the time of submission if the proposal is considered to be large scale.	No change.
164	BE.17		1	Criteria for Large Scale Residential Development	Criterion 6 lacks clarity and appears contradictory in desiring "private rear gardens to back on to each other and wherever possible to face on to the street"	Redraft or delete (PPG12).	Acknowledge. The policy will be redrafted as below.	Redraft criterion 6 to read "Private rear gardens should back on to each other and wherever possible face on to other public places"

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	BE.17		1	Criteria for Large Scale Residential Development	<p>Unreasonable to insist on maximum densities on sites for large scale residential developments (Criterion 2). Maximum density is not specified. Building at high densities may result in developments which are inappropriate for their context, unattractive or unsatisfactory. May also conflict with Criterion 5 (Outlook, overlooking), which is supported.</p> <p>Criterion 6 is contradictory - cannot back onto one another whilst at the same time face the street.</p> <p>Criterion 7 (provision of defensible space)requirements may not be appropriate in all cases and could conflict with the efficient use of land.</p>	Delete references to maximum densities and criteria 6 and 7.	<p>Criterion 2 sets out that the average density should be at the maximum that is feasible given the site constraints. Implicit within this is that the maximum density will differ with each site and must be resolved each time based upon the characteristics of each site. It cannot therefore be specified. Criterion 6 is acknowledged as containing a contradiction. Criterion 7 sets out a reasonable approach to the definition of defensible space. Where a developer considers this to be inappropriate for whatever reason this will need to be justified, and each case will be treated on its merits.</p>	<p>Criterion 2 - No change. Criterion 6 - Delete "the street or" Criterion 7 - No change. Redraft the introduction to the policy to read:"The City Council will permit development if it satisfies the following criteria or a variation is agreed:"</p>

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	BE.17		1	Criteria for Large Scale Residential Development	<p>Policy seems overly detailed and prescriptive. Does not allow for innovative solutions. Criterion 2 (maximum densities) should acknowledge need to meet a range of housing needs (see criterion 4 - range of house types), and it will not always be desirable to meet the maximum density feasible on a site.</p> <p>Criterion 6 appears contradictory in that rear gardens cannot face each other and the street or other open space.</p>	<p>Rephrase Criterion 2 to make it clear that the average density is at the maximum given site constraints, the need to provide for a range and choice of housing and impact on the local area.</p>	<p>Criterion 2 - Agree. Criterion 6 - Agree.</p>	<p>Criterion 2 - Agree reword to read: The average density is at the maximum that is feasible given the site constraints, need and impact on the local area, Criterion 4 below and the density policy; Criterion 6 - See proposed changes in response to Objection 167.22</p>

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation	
205	BE.17			1	Criteria for Large Scale Residential Development	A number of the criteria within the policy are overly prescriptive and would be more appropriate in Supplementary Planning Guidance. In particular criteria 6-10 create a series of detailed design preferences which are inappropriate policy inclusions within the Local Plan and which will prevent the Council from considering the merits of a particular scheme. PPG 12 seeks to reduce the prescriptive nature of Local Plans, see paras 3.11 and 3.12.	Simplify policy by deletion of criteria 6-10 and reserve such detailed prescriptive Development Control guidelines for accompanying SPGs.	Disagree. Paragraph 3.11 of PPG12 suggests that "The local plan..... Sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions." It is considered that the criteria referred to within this objection are consistent with this advice.	No change.
217	BE.17			1	Criteria for Large Scale Residential Development (criteria 2)	No planning justification for the incorporation of "need" in criterion2 (maximum densities). Nor is it included in associated policy H7. Government has already established an underlying need to make best use of land resources via maximum appropriate residential densities. Inappropriate for Local Plan to set policy which might run contrary to government advice.	Not stated.	The point is acknowledged that the use of "need" within this criterion is inconsistent with Policy H7originally and as revised in response to other objections.	Amend Criterion 2 to read: "The density takes account of the requirements of Policy H7"

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	BE.17		1	Criteria for Large Scale Residential Development (criteria 7)	Criterion 7 (provision of defensible space) is unnecessarily detailed and fails to recognise that such enclosure may not be appropriate in all designs, e.g. a news type development.	Not stated.	Acknowledged. See response to Objection 167.22	See response to Objection 167.22
217	BE.17		1	Criteria for Large Scale Residential Development (criteria 6)	Unclear how requirements of criteria 6 (Private rear gardens) might be met. Unlikely to back onto each other and face the street.	Not stated.	Acknowledged. See response to objection No.167.22	See changes proposed in response to objection 167.22

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.18		1	Vehicular Circulation and Parking in New Residential Development	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.18		1 Vehicular Circulation and Parking in New Residential Development	Criterion 4 - covered storage provision for 2 cycles, not always possible in high density schemes. Criterion 7 - pavements need not be constructed to an adoptable standard if they are not to be adopted.	Criterion 4 should not be a policy requirement. Criterion 7 - not stated.	Criterion 4 seeks the provision of covered storage provision for two cycles. It is acknowledged that in certain circumstances it may not prove possible to provide this level of facility and this is allowed for in the introduction to the policy which states that "the design of the scheme should ensure that.." rather than will ensure that. The promotion of this criterion will ensure that the issue is addressed and potential solutions may be developed as a result of it. This will further promote sustainable transport movements and make the use of cycles more acceptable in the modern residential environment. Criterion 7 relates to the construction of pavements to adoptable standards. Whilst the City Council cannot insist that all roads and pavements are ultimately adopted, it would in all circumstances encourage this. As such, given the comments on Criterion 4 above, the policy position that "the design of the scheme should ensure that" rather than must ensure that, provides the	No change.

necessary flexibility for the applicant to justify why footpaths should not be constructed to such a standard.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.18		1	Vehicular Circulation and Parking in New Residential Development	Criterion 4 (covered storage provision for 2 bicycles) lacks clarity. Presumably meant to apply to each dwelling. However, if so the figure is arbitrary and requires justification.	None stated.	Confirm that the figure is to apply to each dwelling. This is derived from the likely minimum occupation of 2 people per dwelling.	Add "per dwelling" at end of Criterion 4.

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Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	BE.18		1	Vehicular Circulation and Parking in New Residential Development	Criterion 4 (Covered storage provision for 2 cycles), is inappropriate for inclusion in a Local Plan policy. Decisions on whether to own or use bicycles rest with the individual and storage decisions should also.	Delete criterion 4.	Disagree. The improvement and enhancement of cycling facilities is a principal element in the development of sustainable transport patterns. One factor which can readily dissuade people from the use of cycles is the lack of storage in or adjacent to the home. Given the existence of Policy TR 35 which seeks to encourage the provision of at least one cycle with each dwelling, the decision of the owner would be then whether or not to retain the cycle/s and whether the storage was then capable of use for something else.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	BE.18		1	Vehicular Circulation and Parking in New Residential Development	Criterion 4(covered storage provision for 2 cycles) is considered too detailed for inclusion in a local plan policy.	None stated.	Disagree. The improvement and enhancement of cycling facilities is a principal element in the development of sustainable transport patterns. One factor which can readily dissuade people from the use of cycles is the lack of storage in or adjacent to the home. Given the existence of Policy TR 35 which seeks to encourage the provision of at least one cycle with each dwelling, the decision of the owner would be then whether or not to retain the cycle/s and whether the storage was then capable of use for something else.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	BE.18		1	Vehicular Circulation and Parking in New Residential Development	Criteria are overly prescriptive for a Local Plan policy and would be more appropriate in Supplementary Planning Guidance. Policy identifies Council preferences to guide Development Control decisions, but such detail is considered unnecessary to be set out within Local Plan policy. View is supported by PPG12 at paras 3.11 and 3.12.	Delete policy and place detailed criteria in an accompanying SPG.	Disagree. The advice contained within PPG12 -"Development Plans and Regional Planning Guidance" is that: "The precise level of detail is a matter for local decision, but authorities should bear in mind that the more detailed the plan, the longer it is likely to take to adopt, and the greater the chance that it will not be up-to-date when it is adopted" It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.19							
		1		Enclosure of Front and Side Gardens on Existing Open Plan Estates	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
191	BE.19							
		1		Enclosure of Front and Side Gardens on Existing Open Plan Estates	Enclosure of gardens and unusable strips of land can result in footpath links which were originally laid out through open areas becoming enclosed alleyways which are unattractive to pedestrians particularly at night. Policy should be framed so as to prevent this.	Amend policy BE19 to read: "Enclosure of gardens and unusable strips of land will be allowed on existing open plan estates provided that the land to be enclosed does not adjoin a footpath link and its enclosure does not harm the visual amenity of the locality"	Agree. It is important to protect the accessibility and community safety of existing open plan estates.	Amend Policy BE19 to read: "Enclosure of gardens and unusable strips of land will be allowed on existing open plan estates provided that the land to be enclosed does not adjoin a footpath link and its enclosure does not harm the visual amenity or community safety of the locality."

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Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.20		1	Extensions	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.21		1	Safeguarding of amenity.	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.22			1 Applications to and Development Within the Curtilage of Listed Buildings	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.22		1	Applications to and Development Within the Curtilage of Listed Buildings	Criterion 5 relates to process matters more suitable for guidance notes rather than providing a clear rational and consistent basis for deciding applications.	Should be redrafted or deleted (PPG12).	PPG15, "Planning and the Historic Environment" asks all Local Planning Authorities to take it into account in the exercise of their listed building and development controls (Para 3.2). Annex C, section C.4 also states "Information about the history and development of a building will be of value when considering proposed alterations...."	No change.
96	BE.23		1	Development Affecting the Setting of Listed Buildings	Use of the word "normally" does not provide a clear basis for decisions and is contrary to current Government advice	Reword policy to read: "The Council will not permit development that adversely affects the setting of a listed building"	Agree, but consider the deletion of the word "any" in addition to "normally" weakens the policy.	Reword the policy to read "The Council will not permit any development that adversely affects the setting of a listed building"

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Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.23		1	Development Affecting the Setting of Listed Buildings	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.
164	BE.23		1	Development Affecting the Setting of Listed Buildings	Use of the word "normally" detracts from the clarity of the policy.	Policy should be redrafted or deleted (PPG12).	Agree.	Redraft policy to read: "The Council will not permit any development that adversely affects the setting of a listed building"

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.24							
		1		Demolition of a Listed Buildings	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.24							
		1		Demolition of a Listed Buildings	Criteria 2 and 3 do not relate to planning land-use matters.	<p>Suggested Rewording:</p> <p>DEMOLITION OF A LISTED BUILDING</p> <p>Development involving the total or partial demolition of a listed building including any features of special architectural or historic interest which contribute to the reasons for listing, will only be permitted if all of the following criteria are met:</p> <p>(a) it is not practicable to continue to use the building for its existing or previous purpose;</p> <p>(b) there is no other viable use for the building;</p> <p>(c) the character or appearance of the listed building will be improved by partial demolition , or demolition of features within its setting;</p> <p>(d) demolition and the creation of a cleared site will not cause harm to the setting of any other listed building, the character of a street scene or the character of a conservation area.</p>	Disagree. The Policy as worded is in accord with PPG 15 "Planning and the Historic Environment" Paragraphs 3.11 and 3.17 provide the justification for the inclusion of these criteria.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.25		1	Consent for demolition of a listed building.	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.26		1	Relaxation of policies.	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.
96	BE.27		1	The Principle of Enabling Development	Guidance from which the policy is taken has been updated (June 2001)	In point 1, delete "or landscape" and add "landscape or biodiversity"	Agree.	At point 1 of the policy, delete "or landscape" and add "landscape or biodiversity"

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.27							
		1		The Principle of Enabling Development	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.27		1	The Principle of Enabling Development	Criteria 4, 5 and 7 are not planning land-use related matters.	Criteria listed above should be deleted or redrafted(PPG12).	With the exception of Criterion 7, the two criteria listed are taken directly from the English Heritage document "Enabling Development and the Conservation of Heritage Assets", June 2001 which sets out to amplify and reinforce the advice contained in PPG 15 and 16. As such it is considered appropriate that the policy as a whole should remain within the Plan. Criterion 7 sets out the responsibility for the funding of the work in order to provide certainty and clarity to applicants.	No change.
170	BE.27		1	The Principle of Enabling Development	Insufficiently flexible and too negative.	Change to: "Permission will be granted when the following criteria are met...."	Disagree. The Policy reflects the Recommendationns contained within the English Heritage document "Enabling Development and the Conservation of Heritage Assets", June 2001.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.28		1	Linking Enabling Development to the Heritage Objectives	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.28			1 Linking Enabling Development to the Heritage Objectives	Use of the word "normally" detracts from the clarity of the criterion.	Redraft or delete criterion. Given link with Policy BE27, the two policies could be amalgamated.	Agree. Given that enabling development would be within the curtilage of or sufficiently adjacent to a listed building or SAM to trigger this policy, outline planning applications would not be acceptable. Do not however accept the need to combine Policy BE28 with BE27. Both are drawn from the English Heritage document on "Enabling Development and the Conservation of Heritage Assets", June 2001 and address separate issues, one following from the other.	Amend Criterion 1 by the deletion of "..., normally"

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
103		4.41	1	Text relating to Conservation Areas.	The existing Additional Areas Local Plan referred to designating a Conservation Area around St. James Church. This is still relevant given the aims and objectives set out in the Introduction to this Chapter of the Local Plan.	Refer to designating a Conservation Area at Quedgeley.	The merits of the St James area of Quedgeley for consideration for Conservation Area status have been considered in some detail since the publication of the Additional Areas Local Plan. Whilst the area does display characteristics not common elsewhere within the parish, it is not considered that there is sufficient architectural or historic quality within the area to warrant the designation as suggested by the objector.	No change proposed.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.29			1 Development within Conservation Areas	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The precise level of detail is a matter for local decision, but authorities should bear in mind that the more detailed the plan, the longer it is likely to take to adopt, and the greater the chance that it will not be up-to-date when it is adopted" It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.
164	BE.29	4.41	1	Development within Conservation Areas	Development is required to preserve or enhance the character or appearance of a conservation area. The wording "or enrich..." is superfluous.	Delete "or enrich..." (PPG15).	Agree. The current wording goes beyond government advice.	Amend Criterion 1 to read, "Preserve or enhance the character and appearance of the conservation area;" Amend Paragraph 4.41 to read "...and will be expected to preserve or enhance the character..."

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Ref No	PoI No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation
96	BE.30	1	Demolition of Non-Listed Buildings in Conservation Areas	Policy is weaker than guidance in PPG15, para 4.27 which refers to tests set out in para 3.19 of that document.	Reword and strengthen policy: "There is a general presumption in favour of retaining buildings and substantial parts of buildings which make a positive contribution to the character or appearance of a conservation area. Applications for the demolition of buildings in conservation areas will be determined having regard to the following considerations: 1) the part played by the building in the architectural or historic interest of the area; 2) the condition of the building and the viability of its retention and continued occupation; 3) the wider effects of demolition on the surroundings and on the Conservation Area as a whole, and 4) whether the replacement scheme will make a positive contribution to the appearance or character of the area, or bring other substantial benefits to the community that outweigh the harm caused by the loss of the buildings.	Agree.	Delete existing policy BE 30 and replace with:"There is a general presumption in favour of retaining buildings and substantial parts of buildings which make a positive contribution to the character or appearance of a conservation area. Applications for the demolition of buildings in conservation areas will be determined having regard to the following considerations: 1) the part played by the building in the architectural or historic interest of the area; 2) the condition of the building and the viability of its retention and continued occupation; 3) the wider effects of demolition on the surroundings and on the Conservation Area as a whole, and 4) whether the replacement scheme will make a positive contribution to the appearance or character of

the area, or bring other
substantial benefits to the
community that
outweigh the harm caused
by the loss of the
buildings.

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122	BE.30							
		1		Demolition of Non-Listed Buildings in Conservation Areas	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -" Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	BE.30		1	Demolition of Non-Listed Buildings in Conservation Areas	Development is required to preserve or enhance the character or appearance of a conservation area. The wording ".or enrich..." is superfluous.	Delete "or enrich..." Add wording to policy or an additional criterion stating that "detailed proposals for the re-use of the site, including any replacement building or structure have been approved" (PPG15).	Agree.	See recommended redrafting of Policy in response to Objection 96.3 and the new Policy recommended in response to Objection 96.2
168	BE.30		1	Demolition of Non-Listed Buildings in Conservation Areas	Policy should be amended to comply with PPG15.	Amend policy to comply with PPG15.	It is considered that the policy as it stands and the new policy to be added in response to objection 96.2 adequately reflect the advice contained in PPG15 - "Planning and the Historic Environment" paragraphs 4.25 to 4.29.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
96		2		New policy on conservation areas	New policy required in line with PPG15, paragraph 4.29	After Policy BE30 insert new policy: "Planning permission for development involving the demolition of buildings within Conservation Areas will be subject to the imposition of conditions or the negotiation of a planning obligation to provide that demolition should not take place until a satisfactory form of contract for the carrying out of works of redevelopment has been entered into"	Agreed.	Add new policy after BE 30, to read:"Planning permission for development involving the demolition of buildings within Conservation Areas will be subject to the imposition of conditions or the negotiation of an obligation under the 1990 Act to provide that demolition does not take place until a satisfactory form of contract for the carrying out of works of redevelopment has been entered into."

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.31		1	Preserving sites of archaeological interest.	Policy is contrary to PPG12, lengthy and over-detailed. Should form Supplementary Planning Guidance with a general policy encouraging good design and referring to the SPG included within the Local Plan.	Delete policies and replace with general policy encouraging good design. Set out details as SPG and refer to it in general policy.	Disagree. The advice contained within PPG12 -"Development Plans and Regional Planning Guidance" is that: "The local plan ,.....sets out the local planning authority's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions."(Paragraph 3.11) It is acknowledged that this paragraph then goes on to suggest that lengthy, over-detailed plans are likely to lead to an increased number of objections which might mean the plan then takes longer to reach adoption. It is considered that the policy under question is appropriate for inclusion within the Local Plan and that its inclusion will not render the final adopted plan out-of-date.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.31		1	Preserving sites of archaeological interest.	Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites. The archaeological issues arising from the allocation of land for development are not generally set out in the text. Where it is known that significant archaeological issues will arise these should be identified.	Amend policies accordingly.	See response to Objection 163.91.	See Recommendationns in response to Objection 163.91.
163		4.42	1	No reference to Archaeology in Glossary	No archaeological definitions included in Glossary. Entries should cover Scheduled Ancient Monuments and Areas of Principal Archaeological Interest.	Amend Glossary accordingly.	Acknowledged and agreed.	Set out entries for Scheduled Ancient Monuments (SAMs) and Areas of Principle Archaeological Interest in the Glossary as follows:

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163	BE.32	1	Archaeological Assessment	<p>Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites.</p> <p>The archaeological issues arising from the allocation of land for development are not generally set out in the text. Where it is known that significant archaeological issues will arise these should be identified.</p>	Amend policies accordingly.	Acknowledge. See detailed Recommendationns below.	<p>Following text to be inserted above policy BE.31:</p> <p>"There is evidence of continuous human occupation in Gloucester district from the Palaeolithic (Old Stone Age) right up to the present day. The first permanent settlement within the City was a Roman fort established Kingsholm following the invasion of Britain under the Emperor Claudius in 43 AD. In about 65 AD this fort was replaced by large Legionary fortress covering what is now the modern city centre. The fortress was later established as a civil settlement named Glevum for retired soldiers during the reign of the Emperor Nerva (96-98 AD). Following a period of abandonment after the collapse of Roman Rule, the city was reoccupied in the 8th century by the Anglo-Saxons who reused the Roman defences, but established new streets, markets and churches. This provided the</p>

framework for the
thriving medieval city
with its castle, guilds and
religious houses, a city
which has now been in
existence for over 1900

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							<p>years.</p> <p>Known archaeological sites and monuments within the City have two levels of protection. The first are Scheduled Ancient Monuments which are protected by law under the Ancient Monuments and Archaeological Areas Act 1979. The second are Areas of Principal Archaeological Interest defined by Gloucester City Council using information contained in the Gloucester Urban Archaeological Database. However, this does not imply that other areas within district are of no archaeological interest. Government planning policy in relation to archaeology is set out in Planning Policy Guidance Note 16 (PPG16, Department of the Environment, 1990). The broad principles set out in PPG16 can be summarised as follows:</p> <p>a. There is a general presumption in favour of the physical preservation</p>

of nationally important
archaeological remains.

b. The need to assess
the archaeological
implications of

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							<p>developments before determination of planning applications.</p> <p>c. The need to secure a suitable archaeological mitigation strategy; the preferred option being preservation in situ, as against preservation by record (archaeological excavation)."</p> <p>Reorganisation of Text</p> <p>Move paragraph 4.46, policy BE.34 and policy BE.35 to new position below policy B31. Add list of Scheduled Ancient Monuments and Areas of Principal Archaeological Interest to Plan as Appendix 5. Add to Paragraph 4.43 after "(See Proposals Map" "and Appendix 5"</p> <p>Scheduled Ancient Monuments</p> <p>No Name</p> <p>00116 Blackfriars 00186 Matson Camp 00188 Hucclecote Roman Villa 00216 Greyfriars Church</p>

00219 Infirmary Arcade
00220 Little Cloister
00221 St Mary's
Gateway
00223 St Oswald's Priory

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Ref No	PoI No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation
							00224 St Nicholas House
							00228 Roman Remains Eastgate Street
							00330 Glevum Roman Colonia
							00331 Remains of Roman Wall
							00337 Llanthony Priory Secunda
							00350 Scrivens Conduit
							00362 Sneedham's Green Moat
							00393 Wall North Bishop's Palace
							00394 Garden Pavilion (Bishop's Palace)
							00398 Tower of St Michaels Church
							00427 Over Bridge
							00462 Hempsted Village Cross
							00463 Lady's Well
							00465 Kingsholm Palace
							00468 Eastgate
							00480 St James Church Moat
							13805 Manor Farm Moat
							28814 Tanner's Hall
							F. Areas of Principal Archaeological Interest (Archaeological significance)
							A Kingsholm (Roman

Fort and Saxon
Settlement)
B Walham (Iron Age
Settlement)
C Parkend Road / New
Street (Roman Cemetery)

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Ref No	PoI No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation
							D Podsmead Moat (Medieval Moated Site)
							E Robinswood Hill (Historic Landscape)
							F Newark Hempsted (Civil War Earthworks)
							G Selwyn School (Historic House and Gardens)
							H Barnwood Villa and Cemetery (Roman Villa and Cemetery)
							I Metz Way Villa (Roman Buildings)
							J Hucclecote Prehistory (Prehistoric-Roman Activity and Settlements)
							K Barnwood Gravels (Prehistoric-Roman Activity and Settlements)
							L Saintbridge Allotments (Iron Age Settlement)
							M Horton Road (Roman Cemetery)
							N Olympus Park (Roman Villa)
							O Hucclecote (Roman Villa)
							P Netheridge (Early Settlement)
							Q Hempsted Grove (Early Enclosure)
							R East Quedgley (Historic Landscape and Roman Road)

S West Quedgeley
(Historic Landscape)
T Sneedhams Green
(Medieval Moated Site)
U Northern By-pass
(Historic Landscape)

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163	BE.32	4.43	1 Archaeological Assessment	<p>Definition of these areas (Areas of Principal Archaeological Remains) may be difficult to justify should the boundaries be challenged. It is recommended they should be listed in the plan with an indication of the reason for their identification and the nature of remains they are likely to contain.</p> <p>The definition of these areas as opposed to SAMs or "known archaeological sites" is not clearly expressed in the text or the policies. E.g. the policy refers only to the undertaking of an initial assessment, not to other aspects of the development control process - evaluation, or to outcomes, e.g. the need for preservation or recording.</p> <p>Should be mapped in a more distinctive way - very difficult to identify at present.</p>	Amend policy and text accordingly.	The City Council is content that there are sufficient reasons to justify inclusion of each Area of Principal Archaeological Interest and these will be set out in an Appendix along with a list of the Scheduled Monuments. See also response to Objection 163.91.	<p>Set out list of Scheduled Ancient Monuments and Areas of Principal Archaeological Interest at Appendix 5.</p> <p>Scheduled Ancient Monuments No Name</p> <p>00116 Blackfriars 00186 Matson Camp 00188 Hucclecote Roman Villa 00216 Greyfriars Church</p> <p>00219 Infirmary Arcade 00220 Little Cloister 00221 St Mary's Gateway 00223 St Oswald's Priory</p> <p>00224 St Nicholas House</p> <p>00228 Roman Remains Eastgate Street 00330 Glevum Roman Colonia 00331 Remains of Roman Wall 00337 Llanthony Priory Secunda 00350 Scrivens Conduit 00362 Sneedham's Green Moat 00393 Wall North</p>

Ref No	PoI No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation
							00462 Hempsted Village Cross 00463 Lady's Well 00465 Kingsholm Palace
							00468 Eastgate 00480 St James Church Moat 13805 Manor Farm Moat
							28814 Tanner's Hall
							F. Areas of Principal Archaeological Interest (Archaeological significance) A Kingsholm (Roman Fort and Saxon Settlement) B Walham (Iron Age Settlement) C Parkend Road / New Street (Roman Cemetery)
							D Podsmead Moat (Medieval Moated Site) E Robinswood Hill (Historic Landscape) F Newark Hempsted (Civil War Earthworks) G Selwyn School (Historic House and Gardens) H Barnwood Villa and Cemetery (Roman Villa and Cemetery) I Metz Way Villa (Roman

Buildings)
J Hucclecote Prehistory
(Prehistoric-Roman
Activity and Settlements)

K Barnwood Gravels

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Ref No	PoI No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation (Prehistoric-Roman Activity and Settlements)
							L Saintbridge Allotments (Iron Age Settlement) M Horton Road (Roman Cemetery) N Olympus Park (Roman Villa) O Hucclecote (Roman Villa) P Netheridge (Early Settlement) Q Hempsted Grove (Early Enclosure) R East Quedgley (Historic Landscape and Roman Road) S West Quedgeley (Historic Landscape) T Sneedhams Green (Medieval Moated Site) U Northern By-pass (Historic Landscape)

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.33		1	Archaeological Field Evaluation	Onerous policy. Archaeology can be dealt with by condition or a watching brief. Should not be necessary to restrict development entirely.	Not stated.	Disagree. This policy is entirely consistent with Government advice contained in paragraph 21 of PPG16 - "Archaeology and Planning"	No change.
163	BE.33		1	Archaeological Field Evaluation	Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites. The archaeological issues arising from the allocation of land for development are not generally set out in the text. Where it is known that significant archaeological issues will arise these should be identified.	Amend policies accordingly.	See response to Objection 163.91.	See Recommendationns in response to Objection 163.91.
164	BE.33		1	Archaeological Field Evaluation	Policy lacks brevity and conciseness.	Policy should be redrafted (PPG12).	Disagree. The policy reflects the advice contained within PPG16 "Archaeology and Planning" at paragraph 21. The policy does not need to be redrafted but may benefit form a slight alteration as indicated below.	End first sentence of policy after the phrase "Before the application is determined." Delete "and" and commence new sentence "They will be expected..."

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.34		1	Presumption in favour of preserving archaeology	If nationally important remains exist they should be scheduled or otherwise protected. Not appropriate to protect remains unworthy of preservation - involves a subjective view on part of Council, which would unreasonably restrict development.	Not stated.	Disagree. This policy is entirely consistent with Government advice as set out in paragraph 8 of PPG 16 - "Archaeology and Planning."	No change.
163	BE.34		1	Presumption in favour of preserving archaeology.	There is some considerable overlap between policies BE34,35, and 36, all of which might be combined into a single policy covering the preservation of nationally important remains whether scheduled or not.	Combine into one policy.	Disagree. The policies address separate issues which are considered to be best served by the retention of the policies individually. Combination of the policies would detract from the clarity and certainty that is provided to the developer as they now stand.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.34		1	Presumption in favour of preserving archaeology.	Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites. The archaeological issues arising from the allocation of land for development are not generally set out in the text. Where it is known that significant archaeological issues will arise these should be identified.	Amend policies accordingly.	See response to Objection 163.91.	See Recommendationns in response to Objection 163.91.
163	BE.35		1	Scheduled Ancient Monument	There is some considerable overlap between policies BE34,35, and 36, all of which might be combined into a single policy covering the preservation of nationally important remains whether scheduled or not.	Combine into one policy.	Disagree. The policies address separate issues which are considered to be best served by the retention of the policies individually. Combination of the policies would detract from the clarity and certainty that is provided to the developer as they now stand.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.35			1 Scheduled Ancient Monument	Nature and legal status of scheduled ancient monuments should be explained in the text. Mapping of SAMs by antique "M"s should be reconsidered as it is difficult to identify the land area to which they apply.	Amend policy accordingly.	<p>Agree. A new introductory paragraph to the section will be added to indicate the nature and status of SAMs.</p> <p>As far as the delineation of the monuments by the antique "M"s it is acknowledged that this may not show the exact site boundaries but this is largely due to the need to include a large amount of detail on the proposals map. The possibility of adding a new method of illustration indicating the site area will be investigated with the Councils map printers at the appropriate time.</p> <p>However, given the limitations of scale, it is not considered essential to indicate the exact site areas since this might be likely to lead to more errors and misinterpretation than is the case now. Where it is not clear to an interested party what the exact boundary is then that party is more likely to ask for clarification.</p> <p>Where a boundary is shown at an inappropriate scale the interested party is less likely to ask for clarification which can lead to mistakes being made.</p>	<p>Add new introductory paragraph:</p> <p>Investigate the potential to amend the delineation of Scheduled Ancient Monuments on the Proposals Maps with the Map Printers</p>

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.35		1	Scheduled Ancient Monument	Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites. The archaeological issues arising from the allocation of land for development are not generally set out in the text. Where it is known that significant archaeological issues will arise these should be identified.	Amend policies accordingly.	See response to Objection 163.91.	See Recommendationns in response to Objection 163.91.
96	BE.36		1	Preservation in situ	Use of the word "generally" does not provide a clear basis for decisions and is contrary to current Government advice.	Delete "generally"	Agree.	Amend Policy BE36 to read: "There will be a presumption in favour of the preservation in situ of nationally important archaeological remains. The preservation in situ of important archaeological remains will be preferred."

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.36		1	Preservation in situ.	<p>Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites.</p> <p>The archaeological issues arising from the allocation of land for development are not generally set out in the text. Where it is known that significant archaeological issues will arise these should be identified.</p>	Amend policies accordingly.	See response to Objection 163.91.	See Recommendationns in response to Objection 163.91.
163	BE.36		1	Preservation in situ.	<p>There is some considerable overlap between policies BE34,35, and 36, all of which might be combined into a single policy covering the preservation of nationally important remains whether scheduled or not.</p>	Combine into one policy.	Disagree. The policies address separate issues which are considered to be best served by the retention of the policies individually. Combination of the policies would detract from the clarity and certainty that is provided to the developer as they now stand.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.37		1	Recording and preserving archaeology.	<p>Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites.</p> <p>The archaeological issues arising from the allocation of land for development are not generally set out in the text.</p> <p>Where it is known that significant archaeological issues will arise these should be identified.</p>	Amend policies accordingly.	See response to Objection 163.91.	See Recommendationns in response to Objection 163.91.

CHAPTER 4 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	BE.38		1	Meeting the Costs	<p>Objects to the assumption that archaeological assessment, excavation and to display should be financed by the developer. Has no regard to individual site circumstances. Finds may not be encompassed wholly within a development site, or a partnership approach may be necessary to progress an initiative. The developer may just be one element of such a range of stakeholders.</p> <p>Unreasonable to "require" developers to provide for entire costs of interpretation. Policy must be flexible enough to allow for consideration of individual site circumstances and enable negotiation. Circular 1/97 emphasises that contributions should be identified through negotiation and must be fairly and reasonably related to the development.</p>	Policy must be amended to accord with the requirements of Circular 1/97 (Planning Obligations)	Disagree. The Policy is entirely consistent with Government advice contained in Circular 1/97. It states quite clearly that "The City Council will encourage and seek to enter into legal agreements..." There is no mention of any "requirement" within the policy.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	BE.38		1	Meeting the Costs	Developers obligations would be reasonably met by providing a watching brief. Too onerous.	Delete policy or define more closely in terms of its application.	Disagree. The policy and accompanying text (Paragraph 4.52) set out quite clearly the circumstances within which such an agreement would be sought. In the circumstances to be considered, I.e. where archaeological remains had been discovered a watching brief would be wholly inappropriate. The emphasis in this situation is on encouragement and seeking an agreement in the context of the 1990 Act. If the City Council were to make unreasonable requests these would be resisted by the applicant or tested at appeal.	No change.

Ref No	PoI No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	BE.38		1	Meeting the Costs	<p>Policies could be more clearly ordered to indicate the hierarchy of importance and differing degrees of protection from SAMs, Areas of Principal Archaeological Interest to other archaeological sites.</p> <p>The archaeological issues arising from the allocation of land for development are not generally set out in the text. Where it is known that significant archaeological issues will arise these should be identified.</p>	Amend policies accordingly.	See response to Objection 163.91.	See Recommendationns in response to Objection 163.91.
203	BE.38		1	Meeting the Costs	<p>Policy goes further than guidance contained in PPG16 - it requires developers to fund the interpretation and display of the archaeological remains for the general public.</p> <p>No local justification is provided for this approach.</p>	Delete policy.	Disagree. The policy seeks to " encourage and seek to enter into legal agreements..." There is no requirement. Where circumstances dictate, the City will negotiate agreements within the context of Circular 1/97. Local justification will be an integral part of such negotiations and will vary with individual site circumstances.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		4.53	1	Monitoring of Archaeological policies	No monitoring points are identified covering the implementation of the archaeological policies.	Amend text accordingly.	Acknowledged and agreed.	Add to paragraph 4.53

"The number of archaeological evaluations and assessments carried out and submitted as part of planning applications

The number of mitigation strategies for both preservation in situ and preservation by record of archaeological deposits submitted as part of planning applications."

CHAPTER 5 - Travel

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164		5.1	1	The role of the private car in maintaining social inclusion in rural areas.	The Plan should acknowledge the role of the private car in the more rural areas less served by public transport. Significant numbers of persons travel into Gloucester from more rural areas where viable and regular public transport alternatives are not available. The private car should be seen as a key element in promoting and maintaining the social inclusion of these areas (Rural White Paper Ch.6)	None given.	Gloucester City is an urban authority and the Local Plan is therefore unable to tackle rural planning issues.	No change
16		5.1	3		Support for the aims of the Travel chapter.	None given.	Support noted.	No change
<p>CHAPTER 5 T = TYPE 1 - Objection 2 - Omission 3 - Support</p>								

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184		5.1	2		Developments that would increase motor vehicle traffic should not be permitted.	Add as an aim of the plan "Developments that would increase motor vehicle traffic should not be permitted."	An increase in some types of motor vehicles, such as buses, is vital to ensure an efficient and sustainable transport system. New housing within the central area will inevitably increase car traffic to some degree but this will be offset by the social, economic and environmental regeneration benefits of such development.	No change.
192		5.1 to 5.5	3	Travel Introduction	Support to the commitment principles made in the introduction which seek to reduce dependence on the private car and increase the role and patronage of public transport.	None given.	Support noted.	No change.
66		5.4	1		Route of South West Bypass should be altered	Structure Plan should be changed	The County Council is responsible for the implementation of the South West Bypass and for the preparation of the Structure Plan.	No change.
163		5.5	1	Dependence of people on the private motor car	It should be the aim of the plan, not just the chapter, to reduce car dependence.	Replace the word "chapter" with the word "plan" in paragraph 5.5, first sentence.	The travel chapter deals with the travel implications of development and is consistent with the overall aims and objectives of the plan as a whole. The plan should be read as a whole and not as individual chapters.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		5.6	1	Park and Ride	Park and Ride should not be promoted, as this paragraph implies, as a means of transport for those who could catch their local bus.	The plan should emphasise that it seeks to create an environment where the local buses are a desirable means of transport. Amend paragraph 5.6 to reflect this.	Disagree. The paragraph clearly states in bullet point 1 that the existing park and ride sites "offer an alternative to driving into the central area from the northern and southern approaches to the city". The intention of the paragraph is to inform what relevant travel initiatives are currently being implemented.	No change.
192		5.6	1	Travel	Should expand explanation of current initiatives to provide a full policy objective which supports Park and Ride and the implementation of further Park & Ride facilities on all main radial routes into Gloucester.	Amend part of paragraph 5.6, bullet point 1 to read "Two Park & Ride facilities offer an alternative to driving into the central area by car from the northern and southern approaches to the city. It is further intended to construct such facilities on all the main radial routes into Gloucester."	Disagree. The intention of the paragraph is to highlight current initiatives and not to identify specific policy objectives. Policy objectives for full Park and Ride coverage for the city is contained in paragraph 5.42.	No change.
163	TR.1		1	Travel Plans and Planning Applications	"Unacceptable development should never be permitted because of the existence of a travel plan" (PPG13, 2000)	Delete bullet 3 from policy.	Accepted in principle. A rewording is required rather than deletion of policy text to clarify the policy.	Make appropriate changes to Policy TR.1 and the supporting text paragraph 5.7.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	TR.1		1	Travel Plans and Planning Applications	No guidance is provided to define "major" in criterion 1 or "significant" in criterion 2. It cannot be ascertained whether an application will be refused on local traffic grounds until an application has been submitted and appropriate consultation carried out.	Revise policy to reflect concerns.	Generally accepted. However, in many cases, it can only be ascertained whether or not a proposal is acceptable on traffic grounds with early consultation with the Highway Authority. It should not practical to set out general criteria for overcoming all local traffic problems as each proposal needs to be judged on its merits.	Make appropriate changes to paragraph 5.9 to provide guidance on 'major' developments and amend policy TR.1 accordingly, regarding smaller developments.
168	TR.1		1	Travel Plans and Planning Applications & Travel Plans	There is no definition as to what is considered to be 'major' developments nor a definition of what constitutes a 'significant amount of travel'.	None given.	Accepted.	Make appropriate changes to paragraph 5.9 to provide guidance on 'major' developments and amend policy TR.1 accordingly, regarding smaller developments.
217	TR.1		1	Travel Plans and Planning Applications	Planning applications for major development will often be in outline and on a speculative basis. Therefore it will often be difficult for the applicant to properly frame a Travel Plan. It may be to the Council's advantage in achieving a more robust Travel Plan if the obligation for its submission and agreement came later in the planning process, where a specific occupier is committed to the site.	None given	PPG13 states that travel plans should be submitted alongside planning applications which are likely to have significant transport implications (para 89).	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	TR.2		1	Travel Plans and Planning Applications & Travel Plans - Planning Obligations	As drafted the policy provides the Council with a considerable degree of discretion as to when a travel plan will be requested and the scope which it will take.	None given.	The policy and the more detailed supplementary planning guidance are in line with government guidance set out in PPG13.	No change.
66		5.13	1		South West Bypass and IRR4 is looking too short term.	A new One Mile Radius Principle Ring Road should be identified which will fit into a 200 year plan for the city	The South West Bypass and IRR4 are set out in the Structure Plan policy T.10 with which this Local Plan policy complies.	No change.
163		5.14	1	Development and the South West Bypass and St Ann's Way Link	Large scale new development and re-development cannot occur without proper highway infrastructure and completion of the SWBP and St Anne's Way Bridge Link. These road schemes are critical and a precursor to achieve major new development in central and southern Gloucester.	Amend text accordingly.	Disagree. The County Council has established that some development can take place in central and southern Gloucester prior to the construction of the SWBP and IRR4. Policies TR.7 and TR.8 will ensure that large scale development is phased with appropriate highway improvements.	No change.
192		5.14	1		References are required to include implementation in new road schemes for public transport priority routes.	Include reference in paragraph 5.14 to priority for public transport within new road schemes, increasing the overall travel choice for Gloucester.	The South West Bypass, as the name implies, is a bypass for the city and will not be a key public transport corridor into the central area. However, the construction of the SWBP will allow for more bus priority routes to be implemented on other roads leading to the central area.	Amend paragraph 5.14 accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	TR.3		1	St. Anne's Way Bridge Link	Construction of the St Anne's Way Bridge Link would ruin the Docks and nullify a future inland port.	Delete TR.3	The IRR4 is set out in the Structure Plan policy T.10 with which this Local Plan policy complies.	No change.
77	TR.3		3	St. Anne's Way Bridge Link	General support for policy, although the St Anne's Way Bridge Link should have a cycleway and cycle access should be improved from Westgate Bridge up Westgate Street.	None given.	It is anticipated that a cycle path will be part of the design for IRR4. The second part of the comment does not relate to policy TR.3.	No change.
163	TR.4		1	Developer Contributions to St Anne's Way Bridge Link	St Anne's Way will provide the opportunity for taking traffic off The Quay, Southgate St, etc. Therefore those developments that add traffic to those roads, contrary to the aspirations of the plan, should contribute to the St Anne's Way Bridge Link.	Widen the contribution net of the policy to include development that adds traffic to those roads that will be downgraded after the construction of the relief road. The County, as Highway Authority, should be party to the Section 106 Agreement.	Accept that the contribution net can be expanded.	Make appropriate changes to policy TR.4 and supporting text.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	TR.4		1	Developer Contributions to St Anne's Way Bridge Link	Although it is acceptable for contributions to be sought from developers towards the cost of the road scheme, there is a lack of clarity in respect of how the benefits that will accrue to a development, as a result of the new road, will be quantifiably measured, and therefore what level of contributions can reasonably be sought.	The policy should be redrafted to identify what benefits would be accrued from the new road, or deleted.	Accept.	Re-draft policy TR.4 to clarify its objectives.
167	TR.4		1	Developer Contributions to St. Anne's Way Bridge Link	The policy should make reference to Circular 1/97 as the basis on which planning obligations will be sought.	Add reference to Circular 1/97 to the policy.	Disagree. The purpose of the local plan is to implement Government guidance and advice, not to reiterate it. The policies in the plan are intended to accord with guidance contained within circular 1/97.	No change.
199	TR.4		1	Developer Contributions to St Anne's Way Bridge Link	The policy does not provide clear and precise guidance for those who need to know about planning policies.	Delete policy TR.4 and use the text as supporting justification for TR.3, with additional qualification to indicate the criteria against which individual proposals will be judged.	Accept that the policy should be clarified. Do not accept that the policy should be supporting text to policy TR.3. TR.4 is a specific contributions policy related to developments that will result in a material increase in traffic within a specific contributions net. This is policy is entirely different (albeit related) to the land safeguarding policy that is TR.3.	Make appropriate changes to policy TR.4.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
200	TR.4		1	Developer Contributions to St Anne's Way Bridge Link	None given	Policy should be deleted and the text used as supporting justification for policy TR.3.	Disagree that the policy should be supporting text to policy TR.3. TR.4 is a specific contributions policy related to developments that will result in a material increase in traffic within a specific contribution net. This is policy is entirely different (albeit related) to the land safeguarding policy that is TR.3.	No change.
77	TR.4		3	Developer Contributions to St Anne's Way Bridge Link	General support for policy, although the St Anne's Way Bridge Link should have a cycleway and cycle access should be improved from Westgate Bridge up Westgate Street.	None given.	It is anticipated that a cycle path will be part of the design for IRR4. The second part of the comment does not relate to policy TR.3.	No change.
163		5.16	1	Development and contributions to SW Bypass	All relevant development should contribute to completion of the South West Bypass.	Amend the text of the first sentence in paragraph 5.16 to read : "All development which impacts on transport loadings in the Bristol Road corridor should contribute to the construction of the South West Bypass."	Accept in principle and the paragraph 5.16 and text of TR.6 should be clarified to fully reflect the aims of the policy.	Make appropriate changes to paragraph 5.16 and policy TR.6

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
26	TR.5		1	South West Bypass	New roads will cause more traffic. Less need for this road with the new Junction 11A on the M5 and the all ways opening of Junction 12. The road could increase the risk of flooding.	Remove policy and text on South West Bypass.	The South West Bypass is essential to ensure the comprehensive regeneration of the central area is achieved and to relieve congestion on other roads within the city. The road scheme is included in the Structure Plan and will be implemented by the County Council. The County have fully assessed the road scheme with regard to flooding issues in conjunction with the Environment Agency and the City Council.	No change.
46	TR.5		1	South West Bypass	Policy wording is not strong enough. As only one short length of the bypass has been built over the last ten years the wording should seek to "ensure total construction and opening of the South West Bypass during the plan period".	Amend policy wording.	The County Council is the authority responsible for implementing the road scheme.	No change.
66	TR.5		1	South West Bypass	South West Bypass should not be constructed.	Delete policy and all reference to construction of South West Bypass	The South West Bypass is essential to ensure the comprehensive regeneration of the central area is achieved and to relieve congestion on other roads within the city. The road scheme is included in the County Council Structure Plan for implementation during the plan period.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
131	TR.5		1	South West Bypass	Must ensure that the construction of the SWBP is linked to floodplain protection and enforcement measures to benefit both the immediate and wider area through, for example, removal of obstacles to enhance water flow.	Need explicit reference in policy to floodplain protection and opportunity to secure floodplain enhancement. Should cross-refer to flood policies FRP1-4.	Individual policies should not be read in isolation of each other. Paragraph 1.4 states that the plan should be read as a whole. Therefore the flooding policies will be referred to during the consideration of other policies and proposals.	No change.
143	TR.5		1	South West Bypass	The SWBP is intended to be a radial road leading into the city centre, not to bypass the city. When the road is completed, restrictions should be in place which prevents heavy vehicles who do not require access to the city centre from using the road.	None given.	Disagree. The Structure Plan states that the South West Bypass is an orbital route around the west of the city, which will reduce traffic levels on main radial roads in the south of Gloucester.	No change.
184	TR.5		1	South West Bypass	The completion of the South West Bypass would make it easier for people to drive into the city centre from the south. Far from dissuading people from using cars, it would encourage it. The section south of Hempsted Bridge should not be built.	None given.	The Local Plan reflects the Structure Plan approach which says that the SWBP will reduce traffic levels on main roads in the south of the city so that bus priority measures and cycle facilities can be installed. The aim of the plan is to encourage people to travel more by public transport into the central area, which this policy approach complies with.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
166	TR.5		3	South West Bypass	Cory supports the early completion of the South West Bypass.	None given.	Support noted.	No change.
168	TR.5		3	South West Bypass	It should be a requirement for developments along the route of the by-pass to make appropriate financial contributions to its construction in order that it can be implemented during the early part of the plan period. This should be linked to an appropriate development strategy which enables this goal to be realised.	None given.	Support noted. Policy TR.5 does seek contributions for the "development of land west of the canal." The housing strategy has also been reviewed to reflect Government advice in "Planning to Deliver".	No change.
205	TR.5		3	South West Bypass	This policy is strongly supported, as we consider that the South West Bypass will contribute towards improving highway conditions, creating an attractive route into the City, essential for the economic well-being of Gloucester. The Bypass is recognised as a key element of the Local Plan and will greatly assist in achieving the Plan's economic, social and environmental objectives.	None given.	Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
132	TR.6		1	Developer Contributions to the South West Bypass	The policy is imprecise and does not set out the mechanism for calculating contributions.	None given.	Agree in principle. However, the policy and supporting text should be clarified to reflect the fact that each site and its contributions will be assessed on its own merits.	Make appropriate changes to policy TR.6 and supporting text.
147	TR.6		1	Developer Contributions to the South West Bypass	None given	A reasonable approach to contributions should be adopted so that obligations do not undermine the financial viability of sites, resulting in them not coming forward for development in the Plan period.	Agree. The policy and supporting text should be clarified to reflect the fact that each site and its contributions will be assessed on its own merits.	Make appropriate changes to policy TR.6 and supporting text.
163	TR.6		1	Developer Contributions to the South West Bypass	The South West Bypass will take traffic off Southgate St, The Quay etc., to the benefit of the area around these roads. The County as Highway Authority should be party to the Section 106 Agreement.	The contribution net should be widened to include sited which add traffic to those roads that will be downgraded post-relief road, e.g. Southgate St, The Quay.	Agree. The policy and supporting text should be amended to widen the contributions net as appropriate.	Make appropriate changes to policy TR.6 and supporting text.
164	TR.6		1	Developer Contributions to the South West Bypass	Although it is acceptable for contributions to be sought from developers towards the cost of the road scheme, there is a lack of clarity in respect of how the benefits that will accrue to a development, as a result of the new road, will be quantifiably measured, and therefore what level of contributions can reasonably be sought.	The policy should be redrafted to identify what benefits would be accrued from the new road, or deleted.	Accept.	Delete reference to the potential benefits accruing from the new road.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	TR.6		1	Developer Contributions to the South West Bypass	The policy should make reference to Circular 1/97 as the basis on which planning obligations will be sought.	Add reference to Circular 1/97 to the policy.	Disagree. The purpose of the local plan is to implement Government guidance and advice, not to reiterate it. The policies in the plan are intended to accord with guidance contained within circular 1/97.	No change.
199	TR.6		1	Developer Contributions to the South West Bypass	The policy does not provide clear and precise guidance for those who need to know about planning policies.	Delete policy TR.6 and use the text as supporting justification for TR.5, with additional qualification to indicate the criteria against which individual proposals will be judged.	Accept that the policy should be clarified. Do not accept that the policy should be supporting text to policy TR.5. TR.6 is a specific contributions policy related to developments that will result in a material increase in traffic within a specific contributions net. This is policy is entirely different (albeit related) to the land safeguarding policy that is TR.5.	Make appropriate changes to policy TR.6.
200	TR.6		1	Developer Contributions to the South West Bypass	None given	The policy should be deleted and the text used as supporting justification for policy TR.5.	Disagree that the policy should be supporting text to policy TR.5. TR.6 is a specific contributions policy related to developments that will result in a material increase in traffic within a specific contributions net. This is policy is entirely different (albeit related) to the land safeguarding policy that is TR.5.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	TR.6		1	Developer Contributions to the South West Bypass	The policy should apply the tests as set out in Circular 1/97.	None given	The policies in the plan are intended to accord with guidance contained within circular 1/97.	No change.
217	TR.6		1	Developer Contributions to the South West Bypass	The supporting text and the policy are inconsistent. Para 5.16 states that new development along the Bristol Road corridor should contribute to the construction of the SW Bypass. The policy, however, states that any new development which would be likely to increase traffic on Bristol Road does not in itself justify the required contribution and legal agreement.	Amend policy to read, "In determining applications for new development along the Bristol Road corridor, or for development of land west of the canal, the City Council will seek to enter into an agreement under Section 106 of the 1990 Act for the developer to contribute towards the cost of the South West Bypass to an extent which is fairly and reasonably related in scale and kind to the proposed development. The assessment of the need for contribution will be based on the principles set out in Government Circular 1/97."	Accept in principle that the policy and supporting text are inconsistent. They should be redraft to address this.	Make appropriate changes to paragraph 5.16.
168	TR.6		3	Developer Contributions to the South West Bypass	It should be a requirement for developments along the route of the by-pass to make appropriate financial contributions to its construction in order that it can be implemented during the early part of the plan period. This should be linked to an appropriate development strategy which enables this goal to be realised.	None given.	Support noted. Policy TR.5 does seek contributions for the "development of land west of the canal." The housing strategy has also been reviewed to reflect Government advice in "Planning to Deliver".	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	TR.6		3	Developer Contributions to the South West Bypass	This policy is supported.	None given.	Support noted.	No change.
147	TR.7		1	Land West of the Canal	None given.	A reasonable approach to contributions should be adopted so that obligations do not undermine the financial viability of sites, resulting in them not coming forward for development in the Plan period.	The policy approach to contributions is consistent with Government advice.	No change.
166	TR.7		1	Land West of the Canal	This policy is too onerous in that it proposes a restriction on any development west of the Canal prior to the completion of new highway links whether or not the development would increase traffic movements. It is possible that Cory may seek permission at Hempsted Landfill site for a more sustainable form of waste management which would divert vehicles from the landfill rather than generate additional vehicle movements. It is therefore important to take into account the overall environmental benefit of any proposals and, in particular, to consider whether the development would cause a net increase in vehicle movements.	In the first sentence of TR.7, insert the words "which would create a significant net increase in traffic movements" between the words "canal" and "will".	Disagree. The policy does not prohibit all development, only specific parts of some development where there would be unacceptable effects on the road network. The policy will be altered to clarify this point.	Make appropriate changes to policy TR.7 and paragraph 5.17 to clarify the policy.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	TR.7		1	Land West of the Canal	Given the uncertainties associated with the funding, timing and construction of the South West Bypass, it would be inappropriate to prevent the development of sites which in all other respects are acceptable and necessary. TR.7 is overly restrictive and inflexible. Some development must be permitted in order to fund the construction of the remaining links yet the policy would prevent this from occurring and consequently will have the effect of reducing the financial contributions received.	The policy should be amended to enable development to occur where it can be demonstrated that a safe interim access can be accommodated in accordance with national and local design standards.	Disagree. The policy does not prohibit all development, only specific parts of some development where there would be unacceptable effects on the road network. The policy will be altered to clarify this point.	Make appropriate changes to policy TR.7 and paragraph 5.17 to clarify the policy.
199	TR.7		1	Land West of the Canal	The policy is ambiguous in terms of the geographical area referred to. The extent of planning conditions that will be applied is unclear. It is Government policy that the use and extent of planning conditions should be specific to the proposal for which planning permission is sought.	Delete policy.	Disagree that the geographical area is ambiguous. Agree that the policy may be unclear.	Make changes to clarify the policy.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
200	TR.7		1	Land West of the Canal	The policy is ambiguous in respect of the proposed areas to which it would relate and unduly prejudices the timing of individual redevelopment proposals along the key regeneration corridor.	Delete policy.	Disagree, although the policy and supporting text should be clarified.	Make changes to clarify the policy.
66		5.18	1		No further development of the South West Bypass	Delete reference to construction of South West Bypass	The South West Bypass is essential to ensure the comprehensive regeneration of the central area is achieved and to relieve congestion on other roads within the city. The road scheme is included in the County Council Structure Plan for implementation during the plan period.	No change.
167		5.18	1	Release of Land at RAF Quedgeley	The final sentence of this paragraph is not sufficiently clear about the relationship between development at RAF Quedgeley and the completion of the South West Bypass.	Clarify the paragraph.	Agree.	Delete final sentence in paragraph.
66	TR.8		1	Development at RAF Quedgeley	The development of RAF Quedgeley should be phased over 40 years, and mainly warehousing and rail freight.	Wait for 40 years before developing RAF Quedgeley.	RAF Quedgeley is an important site for a mix of uses including housing and employment. Disagree with the respondent's comment on the need for the site to be mainly used for rail freight and warehousing.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	TR.8		1	Development at RAF Quedgeley	Is it expected that the development of RAF Quedgeley will contribute towards the completion of the SW Bypass? If so, the suggestion that this development should not proceed until the bypass is completed may affect the development as a significant contribution will be required without associated income from house sales.	Clarification of contributions sought from RAF Quedgeley and the provision of the bypass.	The policy should be amended to clarify the phasing objectives of the policy. The issue of contributions should be dealt with under policy TR.6.	Make appropriate contributions to policy TR.8 and supporting text.
163	TR.8		1	Development at RAF Quedgeley	RAF Quedgeley should not be developed until completion of the South West Bypass to which it should be expected to contribute.	Amend policy to read, "Development at RAF Quedgeley shall not commence until completion of the South West Bypass. Development shall be phased with the introduction of other public transport improvements to reduce congestion locally but particularly along Bristol Road north of Cole Avenue Junction and increase the attractiveness of local bus services including Park and Ride and improving cycling and walking routes.	Disagree. The respondent itself (County Council) has agreed that some housing development will be allowed before the bypass is completed.	No change.
167	TR.8	5.18	1	Development at RAF Quedgeley	This policy is not sufficiently clear about the relationship between development at RAF Quedgeley and the construction of the South West Bypass. It is also potentially inconsistent with paragraph 5.18.	Clarify the policy.	Agree.	Make appropriate changes to policy TR.8 and supporting text to clarify the policy.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	TR.8		1	Development at RAF Quedgeley	None given	Clarify what is meant by "phased with the construction of the South West Bypass".	Agree.	Make appropriate changes to policy TR.8 and supporting text.
205	TR.8		1	Development at RAF Quedgeley	The commencement and phasing of development at RAF Quedgeley is premature (see comments made on ST.11) and this policy is inappropriate.	Amend policy so that only the development potential of RAF Quedgeley should be referred to rather than the phasing of development. Reference to the South West Bypass and other public transport improvements should only note the potential of RAF Quedgeley to act as a potential catalyst.	Although the central area is the priority for development within the city, the city centre cannot accommodate all the development needs of the city. There RAF Quedgeley has been allocated for mixed use development to help meet the development needs of the city to 2011. The phasing policy is necessary to ensure that development at RAF Quedgeley does not create unacceptable effects on the existing road network.	No change.
184		5.20	2	No free non- residential parking	Free non-residential parking must end. A workplace parking charge should be introduced. Pay and display or some other payment method should apply at new and existing retail and leisure sites.	None given	This issue cannot be addressed by the local plan. The planning authority cannot impose pay and display regimes on private car parks.	No change.
66		5.20 and 5.21	1		New futuristic multistorey car parks with peripheral offices and convenience shops at the suggested One Mile Radius Principal Ring Road.	Allocate new multi storey car parks, shops, offices and OMRPRR	No new road schemes apart from the SWPB and IRR4 are identified in the Structure Plan. Reject this comment..	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		5.21	1	Off Street Parking	This policy implies that developments do not have to be readily accessible by other means of transport and thus conflicts with Structure Plan policy T.1. IT also appears to conflict with PPG13 advice.	Delete bullet point 1 and reference to Travel Plans in paragraph 5.21.	To avoid confusion regarding any potential conflict with Structure Plan policies or PPG13 guidance, the final sentence and bullet points should be deleted.	Make appropriate changes.
217		5.21	1	Parking standards	The exceptions are inconsistent with PPG13. The PPG advises local authorities 'not to require developers to provide more spaces than they themselves wish'.	None given.	Accepted.	Make appropriate changes.
100	TR.9	5.20, 5.21	1	Parking Standards	There is no reference to relaxation of car parking standards for affordable housing as stated in PPG3, PPG13 and Circular 06/98.	None given	The parking standards are a maximum level. Developers may propose a level of parking below the maximum standards.	No change.
100	TR.9	Appendix 4	1	Parking Standards	There is no reference to relaxation of car parking standards for affordable housing as stated in PPG3, PPG13 and Circular 06/98.	None given	The parking standards are a maximum level. Developers may propose a level of parking below the maximum standards.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
153	TR.9	Appendix 4	1	Parking Standards	Object to the car parking standard for food retail development over 1,000 sq.m. set out in Table 4 of Appendix 4. This standard is too restrictive and may inhibit competition. The standards should reflect Government Guidance in PPG13, Annex D.	A maximum car parking standard for food retail development over 1,000 sq.m. should be one space per 14 sq.m. gross floorspace.	Accept.	Make appropriate change to Table A, Appendix 4
154	TR.9	Appendix 4	1	Parking Standards	Objects to car parking standard for hospitals. Hospitals have particular requirements which are not shared with commercial or other uses. The latest version of PPG 13 has deleted standards for hospitals.	Delete reference to C2 in Table A and Table B in Appendix 4.	Accept.	Make appropriate changes to Tables A and B, Appendix 4
159	TR.9	Appendix 4	1	Parking Standards. Appendix 4 - non food retail	Car parking standard for non food retail is more restrictive than those contained within the current PPG13. No account is taken of the type of goods sold other than the distinction between food and non food goods. Account should also be made for other types of retailing.	Amend Appendix 4 to reflect the standard for non food retail over 1000sq.m. of 1 space per 20sq.m. Also to amend the food retailing car parking standard as follows: A1 Food Retail and retailing of Predominantly Bulky Goods - 1 space per 18 sq.m., over 1000sq.m.	Accept amendments to reflect PPG13 standards. Disagree with proposal to alter Food Retail category. "Bulky Goods" are considered to be within the non-food retail category.	Make appropriate changes to Table A, Appendix 4 to reflect PPG13
164	TR.9		1	Parking Standards	It is not clear what source has been used for car parking standards "Other Land Uses" in Appendix 4.	Identify the source of all car parking standards in Appendix 4.	Accept	Make appropriate changes to Appendix 4.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	TR.9		1	Parking Standards	<p>The parking standards are lower than those set out in PPG13. The policy should recognise that parking is only one element of any development proposal. The accessibility of sites by other modes of transport should also be considered when defining an acceptable level of parking. In the central area where access to other modes of transport is greater, there should be a reduced requirement for off-street parking. The approach of applying uniform parking standards in order not to discourage development in the central area. This approach is contrary to Structure Plan policies T1-T5 and PPG 13.</p>	<p>The parking standards in Appendix 4 should be consistent with national advice. The policy should be amended so that there is a reduced requirement for off-street parking in the central area.</p>	<p>Accept that parking standards should be consistent with PPG13. With regards to a reduced requirement for off-street parking, the local plan clearly states that the standards are maximum standards. Policy TR.10 refers to controlling the effects of reduced parking levels</p>	<p>Make appropriate changes to Appendix 4.</p>

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
202	TR.9		1	Parking Standards	The policy and its Appendix act to apply significantly different parking standards to different development proposals, dependent upon whether they are judged to be "strategically significant land uses" or otherwise. There is no justification for this approach which does not appear to be consistent with PPG 13. The application of this policy would give rise to confusion in seeking to identify those "strategically significant land uses".	Amend policy to reflect the approach advocated in PPG 13 with regard to Annex D.	Disagree. The policy and its Appendix reflects the approach in PPG13. The "Strategically Significant Land Uses" are based on the thresholds for "major developments"(PPG13 para 53). For smaller developments, PPG13 states that local authorities should use their discretion in setting standards to reflect local circumstances. This has been achieved through the adopted Local Transport Plan.	No change.
210	TR.9		1	Parking Standards (Appendix 4)	Due to the need to consider Hospitals separate from other land uses, and on an individual basis in line with PPG13, it is inappropriate for the Local Plan to impose maximum standards for the Gloucestershire Royal Hospital.	Delete maximum car parking standards for hospitals in Appendix 4.	Accept.	Make appropriate changes.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
211	TR.9		1	Parking Standards (Appendix 4)	The maximum car parking standards for non-food retail uses over 1,000 sq.m is more restrictive than PPG 13. No account is taken of the type of goods sold other than the distinction between food and non-food goods. Account should be made for other types of bulky retailing.	Amend the car parking standards for non-food retailing to be in line with PPG 13. Amend the food retailing standards as follows : A1 Food Retailing of Predominantly Bulky Goods over 1,000 sq.m - 1/18 sq.m.	Accept amendments to reflect PPG13 standards. Disagree with proposal to alter Food Retail category. "Bulky Goods" are considered to be within the non-food retail category.	Make appropriate changes to Table A, Appendix 4 to reflect PPG13
217	TR.9		1	Parking Standards (Appendix 4)	The parking standards are set at levels below those in PPG13. There is no reason given to justify this departure from national policy. Excessively demanding parking standards will make competition with Cheltenham and Cribbs Causeway more difficult.	Apply PPG13 standards to the Local Plan.	Accept	Make appropriate changes to Appendix 4.
160	TR.9	Appendix 4	3	Appendix 4 - Parking Standards	Generally support the parking standards as set out in Appendix 4.	None given.	Support noted.	No change.
192		5.22	1	Parking provision below the minimum standard	There may be scope to encourage developer funding towards the implementation of other measures, to form an integrated highways strategy, to include Park and Ride facilities.	Amend paragraph 5.22 to include reference for the implementation of Park and Ride facilities as part of developer funding in lieu of car parking.	Accept.	Make appropriate changes to paragraph 5.22.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
64	TR.10		1	Parking Provision below the Maximum Level	Parking Standards should require developers to provide adequate off-street parking spaces so that on-street parking is not increased.	None given	Disagree, the policy reflects PPG 13 in so much as we should not require developers to provide more spaces than they wish, except where there are implications for road safety that cannot be resolved through on-street parking controls.	No change.
100	TR.10	5.22	1	Parking Provision Below the Maximum Level	There is no reference to relaxation of car parking standards for affordable housing as stated in PPG3, PPG13 and Circular 06/98.	None given	The parking standards are a maximum level. Developers may propose a level of parking below the maximum standards.	No change.
122	TR.10		1	Parking Provision below the Maximum Level	The policy does not make sense.	The policy should be amended to ensure that interpretation of the aims and objectives of the policy can be assessed appropriately.	Disagree. The policy should be read in conjunction with the supporting text in paragraph 5.22.	No change.
192	TR.10		1	Parking Provision below the Maximum Level	Reference to the contributions to Park and Ride facilities should be made, as an appropriate requirement for developer funding via Section 106 Agreements.	Amend policy TR.10, criterion 2 as follows, "2. Improve the accessibility of public transport, Park & Ride facilities, cyclists and pedestrians."	Accept.	Make appropriate changes to policy TR.10.
66		5.24	1		Communal city bikes should be available for use at bus stations and the railway station. Cycle paths should be on footpaths. There should be cycle routes through the pedestrianised streets.	Cycle routes through the park and pedestrianised streets.	There exists already a number of cycle paths through the park. Cycle routes through the pedestrianised streets would jeopardise the safety of pedestrians.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
192		5.25	1		Appropriate facilities for safe and secure cycle parking should also encompass public transport facilities, such as Park & Ride. This will assist in promoting sustainable transport, by encouraging a reduction in cars within the city centre based on the availability of Park & Ride facilities.	Include specific reference to Park and Ride facilities as providing appropriate secure parking.	Policy TR.12 expects all relevant development to provide secure covered cycle parking. If not possible on site, commuted sums will be sought to provide these cycle parking nearby, which can include public transport facilities. For the purposes of clarity, the explicit reference to "residential development" will be replaced by reference to all "development".	Make appropriate changes to paragraph 5.25.
122	TR.12		1	Cycle Parking Standards	Objects to the blanket requirement for 2 bicycle spaces per dwelling. Some sites may be along excellent public transport corridors. The policy would seem to have little regard to the requirements of Circular 1/97.	Delete policy.	Disagree. Cycling is an accepted alternative to the car for short trips. People should be given a choice of sustainable travel modes, even if they are located along a bus route or not. This choice means that the provision of appropriate facilities is necessary and should be included within planning consents.	No change.
27	TR.12		3	Cycle Parking Standards	This policy will encourage more people to cycle.	None given.	Support noted.	No change.
141	TR.12	5.24, 5.25, 5.39, 5.40,	3	Cycle Parking Standards	This will help increase cycle journeys	None given.	Support noted.	No change.
CHAPTER 5		T = TYPE			1 - Objection	2 - Omission	3 - Support	

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66		5.26	1		Locate new multi storey car parks near suggested One Mile Radius Primary Ring Road	Allocate sites for new car parks	The Local Plan reflects the strategy of the adopted Structure Plan in terms of new roads. The only new roads required for the plan period are the South West Bypass and the IRR4 link. Parking is based around existing and future needs, not on the basis of a One Mile Radial Principle Relief Road.	No change.
163		5.27	1	Parking in the Central Area	The emphasis is on Park & Ride rather than local buses, with no hint of any parking restraint for shoppers to the peripheral developments. Typo: "is" in line to should be "are".	Emphasise local bus services and consider impact of large amount of peripheral parking on the competing city centre facilities.	Accept in part. The reference to local bus services is noted. The comment regarding peripheral parking is considered, albeit not explicitly, in paragraph 5.26 which states that a balance needs to be struck between the provision of car parks to maintain the commercial viability of the central area and the reduction in car use. As there is no specific policy regarding car parking at peripheral locations it is considered unnecessary and superfluous to make specific reference to this within the current text.	Make appropriate changes to paragraph 5.27 regarding local bus services.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	TR.13		1	Central Area Parking	No parking at Blackfriars, or Western Waterfront. Parking should primarily be located at Monk Meadow, the Quay, Park Road, the Bus Station, The Central Railway Station and Tesco's.	Allocate new sites for car parking	Disagree. It is important to provide parking at Blackfriars and the Western Waterfront to maintain the viability of the city centre as a shopping destination.	No change.
163	TR.13		1	Central Area Parking	The policy appears to cut across other policies on parking. Questions the need to provide extra public car parks.	Define "short stay" car parks.	The City Council's Draft Car Park Strategy establishes the need to provide new car parks to support the Western Waterfront and Blackfriars regeneration strategy. This need also arises as a result of the planned redevelopment of the Westgate Street car park. The definition of short stay car parks is contained within the Glossary.	No change.
168	TR.13		1	Central Area Parking	There should be no provision of new car parks within the Western Waterfront until consideration of the capacity and suitability of the existing car parks has been determined.	None given.	The City Council's Draft Car Park Strategy establishes the need to provide new car parks to support the Western Waterfront and Blackfriars regeneration strategy. This need also arises as a result of the planned redevelopment of the Westgate Street car park.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184	TR.13		1	Central Area Parking	All car parking in the central area, whether long-stay or short-stay, is a waste of valuable land and should be progressively reduced. Car parks should be removed, not added.	None given.	Parking facilities are important to maintain the vitality and viability of town centres, and to enable retail and leisure uses to flourish.	No change.
216	TR.13		1	Central Area Parking	The policy could affect the trading position of existing retailers and the accessibility for shoppers.	Amend the policies and/or supporting text to ensure that full consultation with existing retailers on any new traffic management proposals as well as public transport and pedestrian initiatives.	The changes sought are not related to the policy or the objectives of the policy.	No change.
217	TR.13	5.26	1	Central Area Parking	It is unclear what is intended as 'public car parking'. The Cattle Market developers are not proposing to provide public parking, but parking within the proposed leisure/retail uses which can be used for shoppers visiting the city centre.	Clarify policy and supporting text.	Accepted, although the supporting text in paragraph 5.26 clearly states that new car parks will be provided alongside commercial development at the Cattle Market.	Make appropriate changes to policy TR.13.
66		5.28	1		Coaches would not be road priced within an OMRPRR	None given.	Comment does not relate to the policies or supporting text. There are no references to coach road pricing in the Local Plan.	No change.
26	TR.14		3	Coach Parking	As a form of public transport, coaches will help to reduce the number of vehicles.	None given	Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		5.32	1	Major Developments - shared use parking	Shared overnight residential parking implies that the residents must move their cars in the morning. To work presumably? This is contrary to LTP targets.	Delete reference to shared residential parking.	Accept.	Make appropriate changes to paragraph 5.32.
217	TR.16		1	Shared Parking	1. It is perhaps incorrect to base the aim of shared parking on the assumption (para 5.32) that residential parking is appropriate for sharing. Major development in the central area could expect a good proportion of site residents to go about their daily activities without needing to resort to the private car. It should not be assumed that residential properties will share their parking spaces with other uses. 2. The Plan should recognise that the nature and layout of a mixed use scheme may not always lend itself to share parking.	Amend policy to read: "In major development schemes the City Council will consider, in conjunction with the developer, shared use of parking if considered feasible."	1. Accept comments regarding residential shared parking. 2. The policy clearly states that shared use parking will be sought whenever possible.	Make appropriate changes to paragraph 5.32.
66	TR.16		3	Shared Parking	Overnight residential car parking at multi-storey car parks around the One Mile Radius Principal Ring Road.	None given.	Support noted for shared use residential parking.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	TR.17		1	Proposed Car Parks - Western Waterfront	Long Stay Car Parks at Monk Meadow, St Oswald Road, Railway Station, the Quay and Lower Westgate St.	Allocate sites for long stay car parks.	Priority in the Local Plan is given to the provision of short stay parking to cater for the needs of shoppers and visitors to the central area. The provision of new long stay car parks in the central area is not supported in th Plan.	No change.
163	TR.17		1	Proposed Car Parks - Western Waterfront	The policy should include the length of time the developer would be required to fund the bus facility and it is suggested that this should be 5 years. The County Council as Highway Authority should be party to the Section 106 Agreement.	Amend policy to state that the developers should fund the bus facilities for 5 years.	Accept.	Make appropriate changes to policy TR.17.
184	TR.17		1	Proposed Car Parks - Western Waterfront	All car parking in the central area, whether long-stay or short-stay, is a waste of valuable land and should be progressively reduced. Car parks should be removed, not added.	None given.	Parking facilities are important to maintain the vitality and viability of town centres, and to enable retail and leisure uses to flourish.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
213	TR.17	1		Proposed Car Parks - Western Waterfront	This policy may prejudice the viable commercial redevelopment of the sites. Re. the Westgate Island site, its limited site area means that no separate short stay car park could be provided in addition to those suggested by policy S7/CL2. The Westgate Island site is located very close to the town centre, and therefore do not agree that it is necessary to require the developer to fund a bus service to the central area.	1. Amend the policy to start, "Within the Western Waterfront site MU.2, the City Council will seek the provision of short stay car park facilities...." 2. The policy should also be reworded to state that the Council will seek the dual use of any car park provided to serve the development. 3. Amend the text to say that "...a s.106 agreement to fund bus services should only be sought where it is accepted that such a service is fairly and reasonably related to the proposed development."	The identification of Westgate Island to include a short stay car park does not preclude shared use parking. Policy TR.16 clearly states that the City Council will seek shared use parking whenever possible. The requirement for bus services should be addressed through Travel Assessments.	Amend Policy TR.17 to reflect the need for Travel assessments to identify requirements for new bus services.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	TR.17		1	Proposed Car Parks - Western Waterfront	<p>1. This emerging policy should correctly represent the proposed car parking at St. Oswald's Park. 2. It is unclear from the draft plan what basis the Council takes as its requirement for development of the Western Waterfront to fund bus services through the central area. The Waterfront sites are located within the central area and are therefore easily accessible on foot, by cycle or by existing public transport to the core shopping area. We do not believe that an obligation for improved access to the shopping area could be fairly applied under the tests at paragraph 6 of Circular 1/97. TR.17 therefore sets an unjustified expectation of a legal agreement to the funding of bus services. 3. The policy requirement that bus services should be operational at the time of completion of the dwellings or opening of retail could potentially act to the disadvantage of the regeneration of the Western Waterfront as</p>	<p>Point 3. Amend policy to require the developer to subsidise delivery of bus services (rather than 'fund' services). Point 4. Amend policy to refer to requirement of 'adequate' rather than 'frequent' bus services.</p>	<p>1. The policy is clear that short stay car parking will be provided with the shopping development at St Oswald's Park. 2. The requirement for bus services will be established through Travel Assessments (see previous policy change). 3. Developers will be expected to fund new bus services for the first five years (see previous alteration to policy TR.17), not third parties. 4. It is considered that 'adequate' is no more objective or clear than 'frequent'. 5. Sustainable travel patterns need to be established from the outset of a development. This means the introduction of bus services as the development begins to encourage the use of this mode of transport over the private car.</p>	No change.

the reliance on a third party (bus operators) to deliver services is outside the control of the developers. 4. If the policy continues it should refer to 'adequate' rather than 'frequent' services in order to give greater clarity and to remove

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
193	TR.19	1		Car Park Charging	<p>subjective opinion. 5. It should also recognise the need to phase the introduction of bus services in line with delivery of the development. Without this, the potentially unsustainable outcome of running empty buses could result.</p> <p>Provide limited free parking all around the Centre. This is to assist the regeneration of the city.</p>	Policy allowing for free parking in central area.	Parking charges are considered an effective mechanism to reduce unnecessary private car journeys and to increase the number of trips made by public transport.	No change.

CHAPTER 5 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	TR.19		1	Car Park Charging	To ensure that parking is for short term/shopper use rather than long term/commuter use, time restrictions/duration of parking should be implemented rather than charging. The plan should recognise and accommodate the full range of options for achieving its objectives.	None given.	Parking charges are considered an effective mechanism to reduce unnecessary private car journeys and to increase the number of trips made by public transport. Policy TR.13 and supporting text reflect the City Council's support of short stay parking to give priority to parking for shoppers and tourists.	No change.
122	TR.20		1	Private car parks	The strategy of the policy has little consideration of town centre vitality and viability considerations.	The requirements of PPG 6 should be addressed clearly within the local plan.	One aim of the local plan is to encourage more people to travel by bus, cycling and walking. The policy and supporting text of this policy clearly states that the redevelopment of private car parks should only be allowed where an adoption of a Travel Plan takes place. The principle of this is to ensure the continuing accessibility and therefore viability and vitality of central area sites.	No change.
163	TR.21		1	Central Area Public Transport Service	The County Council as Highway authority should be party to the Section 106 Agreement.	Amend policy accordingly.	Accept. The revised Strategy chapter makes reference to involving the County in such S.106 agreements.	No change to policy.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184	TR.21		1	Central Area Public Transport Service	The City Council should not expect public transport to be provided on the cheap by developers. A vitally important public service such as high quality passenger transport cannot be funded in this way.	None given.	Central government, within PPG13, advises that local authorities should negotiate for improvements to public transport as part of development proposals to help reduce the need to travel by car to such sites.	No change.
217	TR.21		1	Central Area Public Transport Service	1. It is unclear whether the Central Area Public Transport Service would or could be the same as that proposed at TR.17. 2. The policy does not comply with Circular 1/97. The Local Plan cannot reasonably demand that development funds projects proposed to tackle existing problems or where the need for the bus service is not made necessary by the application proposal.	Clarify policy to define what the Central Area Public Transport Service is.	1. The supporting text (paragraph 5.38) explains what the Public Transport Service is. However, accept the comment that we should clarify the policy. 2. The policy does comply with Circular 1/97. It does not refer to existing problems. It is clear that only where developments are proposed which would attract a large number of people would the developer be expected to contribute to the improvement of public transport.	Make appropriate changes to clarify policy TR.21.
66		5.39 and 5.40	1	Enhancing the Pedestrian Routes to the Bus & Rail Interchange	The existing subway at the train station is a considerable risk to pedestrians.	Identify footpath/cycle bridge from Great Western Road to the railway station	This scheme is not planned for in the Local Transport Plan. It would be extremely difficult to justify asking developers to contribute to such a scheme. The improvement to the subway can be achieved through the implementation of policy TR.24	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
16		5.40	3		Support for paragraph referring to improve efficiency and attractiveness of the footpaths to the bus and rail stations.	None given.	Support noted.	No change.
66	TR.22		1	Enhancing the Pedestrian Routes to the Bus & Rail Interchange	The existing subway at the train station is a considerable risk to pedestrians.	Identify footpath/cycle bridge from Great Western Road to the railway station	This scheme is not planned for in the Local Transport Plan. It would be extremely difficult to justify asking developers to contribute to such a scheme. The improvement to the subway can be achieved through the implementation of policy TR.24.	No change.
141	TR.22		3	Enhancing the Bus & Rail Interchange	Support emphasis on increasing the use of public transport, cycling and walking.	None given.	Support noted.	No change.
66	TR.24		1	Enhancing the Pedestrian Routes to the Bus & Rail Interchange	The existing subway at the train station is a considerable risk to pedestrians.	Identify footpath/cycle bridge from Great Western Road to the railway station.	This scheme is not planned for in the Local Transport Plan. It would be extremely difficult to justify asking developers to contribute to such a scheme. The improvement to the subway can be achieved through the implementation of policy TR.24	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
192		5.42	1		The requirements for implementation and usage of Park & Ride facilities should be expanded to ensure appropriate locations are identified.	Amend bullet points 1 and 2 to read, "(1) They should be located at the fringe of the urban area at the point where congestion starts or is forecasted to start in the future and ideally at the intersection of radial and orbital roads, (2) they should be located in reach of the urban centre and where approaching radial routes have good access to the facility..."	Accepted.	Make appropriate changes to paragraph 5.42.
192		5.43	1		The principles of the paragraph should be expanded to support the effective implementation of Park & Ride facilities through complimentary public transport measures.	Amend the paragraph, third sentence, between "Park and Ride" and "at the second Deposit Stage", to include ", along with complimentary bus priority measures that will be identified".	This paragraph will be deleted as the Park and Ride study has been completed with new sites recommended which are outside the city boundary.	No change.
65	TR.25		1	Protection of Park and Ride Sites	If any sites for Park and Ride are identified adjacent to Trunk Roads, then the Highways Agency will need to assess the impact of any proposals on the trunk road network before removing the objection.	Awaiting results of County's Park and Ride study to identify preferred site(s) for Park and Ride.	The preferred Park and Ride sites identified through the County's study are all outside the City's boundary. Therefore the policy is no longer relevant and should be deleted.	Delete policy TR.25 and supporting text.
66	TR.25		1	Protection of Park and Ride Sites	There should be an effective park and ride scheme at Over junction to the railway station.	None given.	The preferred Park and Ride sites identified through the County's study are all outside the City's boundary. Therefore the policy is no longer relevant and should be deleted.	Delete policy TR.25 and supporting text.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
160	TR.25		3	Protection of Park and Ride Sites	The policy makes it clear that it seeks to safeguard "new" sites identified through the park and ride study. We assume that this policy does not apply to British Energy's overflow car park site. This appears reasonable as the overflow car park will become the main car park to the new development on the existing main car park.	None given.	Support noted. However, the policy will be deleted as a result of the County's Park and Ride study not identifying any sites within the city boundary.	Delete policy TR.25 and supporting text.
66		5.45	1		New local railway station and Park and Ride at St Oswald's Road	Allocate land for railway station and Park and Ride at St Oswald's Road adjacent to Tescos, and at Elmbridge, Quedgeley and Over.	The County Council have not identified the need, either in the adopted Structure Plan, or the Local Transport Plan for railway stations at the suggested locations.	No change.
66		5.46	1		Park and Ride Monorail system should be promoted along east bank of canal to Kimbrose Corner	Reference in the plan to the implementation of a monorail system in Gloucester within 10 years	The County Council have not identified the need, either in the adopted Structure Plan, or the Local Transport Plan for a monorail system in Gloucester.	No change.
192		5.46	3		Support for the implementation of associated public transport measures to ensure Park & Ride facilities are effective.	None given.	Support noted	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	TR.26		1	Park and Ride - Waterwells	The policy should protect park and ride sites serving the city centre subject to the proviso that where development for other purposes is to be permitted, the provision of adequate replacement park and ride facilities should be agreed and implemented.	Amend policy so that any replacement facilities are agreed and implemented when permission is granted for other uses on existing park and ride sites.	The Waterwells Park and Ride facility is protected through policy TR.26. The Cattle Market Park and Ride service was intended to be a temporary facility. The County's Park and Ride study has identified appropriate sites for Park and Ride facilities to catch traffic coming from the north. These sites are outside the city boundary at Innsworth and Elmbridge. Paragraph 5.45 clearly states that the Cattle Market will be retained by the City Council for a minimum of 5 years, reflecting the phasing arrangements of St Oswald's Park.	No change.
232		5.47	1	Reference to Quality Contracts	The reference to Quality Contracts is most unhelpful, as it implies that the City Council does not expect to achieve improvements to bus services through the voluntary umbrella of Quality Partnerships. A partnership arrangement is far more likely to lead to stable, long-term improvements in services. Questions the need for reference to Quality Contracts within the Local Plan.	None given.	Paragraph 5.47 clearly states that Quality Contracts will only be implemented when Quality Partnerships have not produced the services required.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	TR.27		1	Bus Priority Routes	Rather than setting out the Authorities general intention to seek to identify scope for bus priority routes, the plan should make positive proposals for such provision, so that it carries forward national, strategic and local plan objectives.	If proposals cannot be identified the policy should be deleted.	Accept. The appropriate routes should be identified on the proposals map.	Add the appropriate bus routes to the proposals map and make appropriate changes to policy TR.27 and supporting text.
184	TR.27		1	Bus Priority Routes	The City Council's faith in the bus is sadly misguided. The bus has lost the battle against the car. Money for bus priority routes would be much better spent on pedestrians and cyclists.	None given.	PPG 13 advises local authorities to identify the key routes for bus improvements and priority measures that will be taken to help enable a reliable network of routes to maximise the potential usage of public transport. This is reflected again within the Local Transport Plan which includes the implementation of bus priority routes within its strategy. Facilities for pedestrians and cyclists will be sought through the implementation of other policies in the plan.	No change.
26	TR.27		3	Bus Priority Routes	Faster bus services will encourage people not to travel by car, reducing congestion and pollution	None given.	Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	TR.28		1	Contributions Towards Bus Priority Routes and Facilities	The blanket requirement and lack of consideration of local circumstances makes this policy incompatible with the requirements of Circular 1/97.	Delete policy.	PPG13 advises that local authorities should negotiate for improvements to public transport as part of development proposals. However accept that individual circumstances need to be taken into account.	Make appropriate changes to Policy TR.28 and supporting text.
147	TR.28		1	Contributions Towards Bus Priority Routes and Facilities	None given	A reasonable and fair approach for assessing contributions should be adopted, reflecting the circumstances of individual development sites.	Agree.	Make appropriate changes to justification text in paragraph 5.49.
163	TR.28		1	Contributions Towards Bus Priority Routes and Facilities	Contributions for the running of buses themselves should be sought. The County Council as Highway Authority should be party to the S.106 Agreement.	Insert "1990" before "Act". Mention of contributions to enhancing bus services should be included within policy.	Accept. Regarding the S.106 agreements, the revised Strategy chapter makes reference to including the County in such matters.	Make appropriate changes to policy TR.28.
164	TR.28		1	Contributions Towards Bus Priority Routes and Facilities	It is not clear how the benefits a development will accrue from bus priority routes will be measured.	Redraft or delete the policy.	Policy re-drafted.	Make appropriate changes to policy TR.28.

CHAPTER 5 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184	TR.28		1	Contributions Towards Bus Priority Routes and Facilities	The City Council's faith in the bus is sadly misguided. The bus has lost the battle against the car. Money for bus priority routes would be much better spent on pedestrians and cyclists.	None given.	PPG 13 advises local authorities to identify the key routes for bus improvements and priority measures that will be taken to help enable a reliable network of routes to maximise the potential usage of public transport. This is reflected again within the Local Transport Plan which includes the implementation of bus priority routes within its strategy. Facilities for pedestrians and cyclists will be sought through the implementation of other policies in the plan.	No change.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	TR.28		1	Contributions Towards Bus Priority Routes and Facilities	The fact that a site benefits from bus routes does not, in itself, justify the expected contributions via a S.106 Agreement. The logic applied is such that a scheme taking benefit from sustainable access must pay for the routes/facilities is entirely counter to the advice in Circular 1/97 and represents a potential penalty to those proposals which represent planning best practice by the fact they have chosen to locate in areas with good public transport access.	None given.	PPG13 advises that local authorities should negotiate for improvements to public transport as part of development proposals.	No change.
163		5.52	1	Home Zones	The County has not finalised a policy on Home Zones.	None given	The comment does not represent a valid objection. There is no objection to any part of the paragraph, or indeed to the policy to which the paragraph relates, and no changes to the paragraph are sought by the objector.	No change.
64	TR.31		3	Road Safety	Residential streets should be protected from noise and pollution caused by through traffic, and from on-street parking by employees and visitors. The streets should be safe for children.	None given.	Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
27	TR.32		3	Protection of Cycle/ Pedestrian Routes	Support particularly given to the proposed junction of the A40 (Westgate Bridge) with the South West Bypass, where safe cycle movement must be maintained.	None given.	Support noted.	No change.
200	TR.32		3	Protection of Cycle/Pedestrian Routes	This is a well structured policy which can provide important links back to the City core from development sites around the city, in particular Monk Meadow. Reference should be made to the role the canal has to play in forming an existing linear feature which can make provision for pedestrian and cycle linkages.	None given.	Support noted. The reference to the role of the canal as a linear feature is mainly covered in the policy and text of TR.39.	No change.
205	TR.32		3	Protection of Cycle/Pedestrian Routes	This policy is supported.	None given.	Support noted.	No change.
163	TR.33		1	Provision for Cyclists/Pedestrians	Questions if any other issues will be considered when applying this policy. Suggests it should be in a negative form.	Amend policy to a negative form, "not allowing development unless..."	The Local Plan should be read as a whole. Therefore other policy issues need to be considered alongside this policy.	No change.
27	TR.33		3	Provision for Cyclists/ Pedestrians	This policy will encourage more people to cycle.	None given.	Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
28	TR.33		3	Provision for Cyclists/Pedestrians	This policy will reduce car travel, cause no pollution from either fumes or noise, and encourage people to be independent of the car.	None given.	Support noted.	No change.
133	TR.33		3	Support for Provision of Cycle routes within new development	Support cycle routes as long as they are kept away from main roads.	None given.	Support noted.	No change.
163	TR.34		1	Cyclist Safety	The County Council as Highway Authority should be party to the Section 106 Agreement.	Amend policy accordingly.	The revised Strategy chapter makes reference to the County being party to such matters.	No change.
27	TR.34		3	Cyclist Safety	This policy will encourage more people to cycle. The less risks to cyclists, the better.	None given.	Support noted.	No change.
141	TR.34		3	Cyclist Safety	Support measures to increase cyclist safety, as very concerned over safety matters at present.	None given.	Support noted.	No change.
122	TR.35		1	Provision of New Bicycles with New Residential Development	The policy is ludicrous, excessive and counter to the requirements of Circular 1/97.	None given.	Disagree. The policy can encourage people to use a more sustainable method of travel from the outset of the development, and also help to meet the Local Transport Plan's modal split targets. The policy does not require developers to provide bicycles, but states that the council will seek the provision of bicycles.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
145	TR.35		1	Provision of New Bicycles with New Residential Development	This policy is unduly onerous and without justification. There is nothing in Government Guidance which states that developers should provide bicycles for residents.	Delete policy.	Disagree. The policy can encourage people to use a more sustainable method of travel from the outset of the development, and also help to meet the Local Transport Plan's modal split targets. The policy does not require developers to provide bicycles, but states that the council will seek the provision of bicycles.	No change.
163	TR.35		1	Provision of New Bicycles with New Residential Development	The County Council as Highway Authority should be party to the Section 106 Agreement.	Amend policy accordingly.	The revised Strategy chapter makes reference to the County being party to such matters.	No change.
164	TR.35		1	Provision of New Bicycles with New Residential Development	The policy lacks clarity in that it is presumably seeking provision of one bicycle space per dwelling, which conflicts with Table C in Appendix 4 which seeks a minimum of 2 cycle spaces per dwelling.	Re-draft the policy to clarify the inconsistencies.	Disagree. The policy clearly states the intention to seek a bicycle with each dwelling, not a bicycle space which is covered by other policies.	No change.
167	TR.35	5.66	1	Provision of New Bicycles with New Residential Development	Bicycles are not a legitimate subject of planning obligations. Decision about the purchase and use of bicycles should rest with individual households. It is considered this policy is impractical, unrealistic and undeliverable.	Delete policy	Disagree. The policy can encourage people to use a more sustainable method of travel from the outset of the development, and also help to meet the Local Transport Plan's modal split targets. The policy does not require developers to provide bicycles, but states that the council will seek the provision of bicycles.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
199	TR.35		1	Provision of New Bicycles with New Residential Development	The policy is contrary to national policy in that it does not relate to the use and development of land. It is also impractical.	Delete policy.	Disagree. The policy can encourage people to use a more sustainable method of travel from the outset of the development, and also help to meet the Local Transport Plan's modal split targets. The policy does not require developers to provide bicycles, but states that the council will seek the provision of bicycles.	No change.
203	TR.35		1	Provision of New Bicycles with New Residential Development	The policy is too prescriptive. The local plan should simply seek contributions towards sustainable transport measures where they can be justified in accordance with Circular advice.	Delete policy.	Disagree. The policy can encourage people to use a more sustainable method of travel from the outset of the development, and also help to meet the Local Transport Plan's modal split targets. The policy does not require developers to provide bicycles, but states that the council will seek the provision of bicycles.	No change.
217	TR.35		1	Provision of New Bicycles with New Residential Development	There can be no sound planning basis for requiring residential developers to fund bicycles. Other policies in the plan act to discourage car use and make more attractive cycling and walking as preferable modes.	Delete policy, or at least amend the policy to make it clear that cycle provision will not be obligatory.	Disagree. The policy can encourage people to use a more sustainable method of travel from the outset of the development, and also help to meet the Local Transport Plan's modal split targets. The policy does not require developers to provide bicycles, but states that the council will seek the provision of bicycles.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
141	TR.35		3	Provision of New Bicycles with New Residential Development	This could encourage potential cyclists in the 25-50 age group to ride.	None given.	Support noted.	No change.
184	TR.35		3	Provision of New Bicycles with New Residential Development	This is a very good idea.	None given.	Support noted.	No change.
164	TR.36		1	Pedestrian Routes Within and Leading to the Central Area	None given	The location of the footpaths as described in the policy should be identified on the proposals map (PPG12).	Accept. It is not possible to identify specific footpaths at this stage. Therefore the policy should be deleted.	Delete policy TR.36.
28	TR.36		3	Pedestrian Routes Within and Leading to the Central Area	This policy will give priority to pedestrians and encourage people to walk.	None given.	Support noted.	No change.
184	TR.37		1	Proposed pedestrian priority schemes	The proposed extension to the pedestrian priority zone is inadequate, both in extent and degree of priority to pedestrians. The majority of the city centre should be traffic free, for most parts of the day at least.	Extend pedestrian priority to include the gate streets from the Cross to London Road, Barton St, Spa Road and Lower Westgate.	Access to city centre shops, homes and employment areas needs to be maintained to ensure the continuing vitality and viability of the primary shopping area and surrounding streets. Increasing the pedestrianised areas will cut off access to these important parts of the city by people using public transport and the shoppers car parks.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
200	TR.39		3	Footpaths/Cycleways Along the River and Canal	The policy supports the principles of British Waterways own stance in seeking "Access for All". Access should not only be defined by achieving physical access. It can go further in providing signage and interpretation, adding value to the waterside experience, TR.39 would benefit by promoting this element to present a more rounded and inclusive policy statement.	None given.	Support noted. The policy and supporting text should be redrafted to include reference to signage and interpretation.	Make appropriate changes to Policy TR.39 and supporting text.
72		5.75	2	Need for a tramway in the city centre	A tramway in the city centre would encourage more trains to stop at the city centre and facilitate the journeys of commuters from Quedgeley.	Identify tramway route	The Structure Plan and Local Transport Plan make no provision for a tramway.	No change.
184		5.75	2	New light rail system	A light rail system should be constructed in the plan period linking Quedgeley and the city centre to Cheltenham, via Barnwood and Elmbridge.	New policy and land allocation for light rail system.	The Structure Plan and Local Transport Plan make no provision for a light rail system.	No change.
16	TR.41	5.75	3	Railway Station	Support for access improvement to bus and rail stations.	None given.	Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
26	TR.41		3	Railway Station	Gloucester Railway Station is ideally located in the city centre. No development should jeopardise its role in the city's travel plan.	None given.	Support noted.	No change.
66	TR.41		3	Railway Station	A new station at Quedgeley would help bring people into the city by rail (therefore increasing the use of the existing central station) so cars could be left on the outskirts.	None given.	Support noted	No change.
141	TR.41		3	Railway Station	Supports protection of the existing railway station.	None given.	Support noted.	No change.
163	TR.41		2	Proposed New Railway Station - Quedgeley	Do not support railway station at RAF Quedgeley, but a potential way forward would be to construct a new railway station in the vicinity of Naas Lane. This would enable the station to serve both the RAF Quedgeley and the Hunts Grove development.	New allocation for a railway station adjacent to Naas Lane.	Accept.	Allocate land south of Naas Lane for a railway station.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139		5.77	1		<p>Objects to reference of a new station for local commuting as a site for a new railway station is promoted at Hunts Grove in the Stroud Local Plan. Question the benefit of a station for local commuting as the proposed station site is in the southern periphery of the site, distant from the majority of new residents on RAF Quedgeley. Discussion on the promotion of a passenger station in this general area would be welcomed.</p>	<p>Amend paragraph 2.34 to refer to the potential to provide a new passenger station in the general area, rather than specific to the RAF Quedgeley site.</p>	<p>The allocation for a railway station is being deleted and replaced on land to the south of Naas Lane. This new site is considered a good location for a station for commuting to the significant areas of employment at Waterwells and RAF Quedgeley. This is the County Council's preferred site for a station now that a rail freight terminal allocation on RAF Quedgeley has been agreed with the developers of RAF Quedgeley.</p>	<p>No change.</p>
20	TR.42		1	Proposed New Railway Station - Quedgeley	<p>A station at Quedgeley would mean losing the South Wales service. Far more weight must be given to putting Gloucester on the railway map. We need more than a possible station; we need to make proper provision now as the current traffic situation will not cope before too long.</p>	<p>None given.</p>	<p>Included within the Local Plan's key development priorities are the aims to achieve a first class public transport services and facilities and to enable the regeneration of the central area. The existing railway station is located within the central area and in the identified public transport interchange. Policy TR.41 aims to protect the existing station and will not allow any development to occur that will undermine its role.</p>	<p>No change.</p>
66	TR.42		1	Proposed New Railway Station - Quedgeley	<p>The location of the railway allocation should be at Naas Lane to serve the Quedgeley</p>	<p>Reserve site for railway station at Naas Lane with adjacent car parking.</p>	<p>Accept.</p>	<p>Appropriate changes have been made to this policy and supporting text.</p>

community.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	TR.42		1	Proposed New Railway Station - Quedgeley	Object to reference to new passenger station, as a site is promoted in the Stroud district Local Plan at Hunts Grove.	Delete policy, or amend to reflect the possibility of alternative provision coming forward locally.	The allocation for a railway station is being deleted and replaced on land to the south of Naas Lane. This is new site is considered a good location for a station for commuting to the significant areas of employment at Waterwells and RAF Quedgeley. This is the County Council's preferred site for a station now that a rail freight terminal allocation on RAF Quedgeley has been agreed with the developers of RAF Quedgeley.	No change.
159	TR.42		1	Proposed New Railway Station - Quedgeley	All new stations must be physically, operationally and commercially viable. Railtrack and the relevant train operating companies must be fully involved in assessing the viability of a new station at this location.	None given.	Accept.	Make appropriate changes to paragraph 5.77.
164	TR.42	5.78	1	Rail Station and Freight Facility at Quedgeley	The railfreight and railway station issues at RAF Quedgeley are unclear. Paragraph 5.78 indicates that RAF Quedgeley will accommodate either a railfreight depot or a railway station. Policies TR.42 and TR.43 suggests the site will accommodate both proposals.	In the interests of clarity the policies should be redrafted to reflect the intention of the plan.	Accept.	Appropriate changes to the policy have been made in light of current information.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184	TR.42		1	Proposed New Railway Station - Quedgeley	There is a need for a restored railway station on the Bristol line at Stonehouse. It is unlikely that train operators would stop there and at Quedgeley.	None given	Stonehouse is outside the City boundary. The site at Naas Lane is the County Council's preferred site for a railway station.	No change.
198	TR.42		1	Proposed New Railway Station - Quedgeley	Although the principle of a passenger station in the Quedgeley area is not objected to, the proposals map implies a certainty of location which is not as yet, justified. Until the outcome of the County Council's study is known and the optimum site location is determined, it is considered inappropriate to indicate that the proposed station will be located on the RAF Quedgeley site, and on land in our client's ownership.	Removal of reference to the RAF Quedgeley site being the location of a proposed railway station. Remove the symbol from the Proposals Map.	There is now more certainty over the preferred location for a passenger station - on land south of Naas Lane.	Appropriate changes to the policy have been made in light of current information.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
201	TR.42		1	Proposed New Railway Station - Quedgeley	The provision of a station in this location is not compatible with the provision of the rail freight terminal. A rail freight terminal should take priority. An alternative railway station is available to the south of RAF Quedgeley capable of serving the major residential and employment developments at RAF Quedgeley, the existing development at Waterwells and the proposals of Stroud District Local Plan at Hunt's Grove.	Delete policy	The County Council's preferred site for a passenger station is on land south of Naas Lane.	The local plan allocation has been altered to reflect the County's preferred site.
16	TR.42		3	Proposed New Railway Station - Quedgeley	None given	None given.	Support noted.	No change.
26	TR.42		3	Proposed New Railway Station - Quedgeley	This would provide a much needed facility for commuting into Gloucester, possibly avoiding the need to build the South West Bypass.	None given.	Support noted.	No change.
28	TR.42		3	Proposed New Railway Station - Quedgeley	This would provide a fast alternative to the car, reducing traffic congestion into Gloucester.	None given.	Support noted.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
59	TR.42		3	Proposed New Railway Station - Quedgeley	Implement policy TR.42 instead of a rail freight depot	None given.	Support noted.	No change.
72	TR.42		3	Proposed New Railway Station - Quedgeley	None given	None given.	Support noted.	No change.
103	TR.42		3	Proposed New Railway Station - Quedgeley	A passenger station would help relieve existing transport problems in the area.	None given.	Support noted.	No change.
72	TR.42		2	Need a railway station at the Barnwood Triangle	Many trains do not stop at Gloucester station at present	Allocate land for a railway station at Railway Triangle	Policy TR.41 is clear that the council will not allow proposals that would undermine the role of the existing station in the city centre.	No change.
163	TR.42		2	Proposed New Railway Station - Quedgeley	Do not support railway station at RAF Quedgeley, but a potential way forward would be to construct a new railway station in the vicinity of Naas Lane. This would enable the station to serve both the RAF Quedgeley and the Hunts Grove development.	New allocation for a railway station adjacent to Naas Lane.	Accept.	Allocate land for a railway station on land south of Naas Lane.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		5.78	1	Rail Freight	The City Council's approach to the issue of rail freight depots is unsatisfactory. PPG12 and accompanying regulations make it clear that the first deposit stage is the most crucial part of the local plan process. Choices about the location of such facilities should have been put forward at an earlier stage, and a firm choice of a single site made (if necessary) at this the first deposit stage. RAF Quedgeley is an inappropriate location for a rail freight facility.	Delete reference to RAF Quedgeley.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester.	Allocate RAF Quedgeley for a rail freight terminal.
12	TR.43		1	Proposed Rail Freight Terminals RAF Quedgeley	A rail freight terminal on this site is incompatible with adjoining residential areas: goods vehicles will add to traffic congestion; there would be noise nuisance, especially at night; and the lighting for the terminal would greatly increase light pollution.	Remove reference to safeguarding land at RAF Quedgeley in text and policy.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. Pollution issues are addressed in policies FRP.10 and FRP.11. Any future planning application should ensure that neighbouring uses are protected from the impact of a rail freight terminal on the site.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
16	TR.43		1	Proposed Rail Freight Terminal	RAF Quedgeley cannot accommodate both a passenger station and a rail freight terminal. There is a better site outside Gloucester (old Cheltenham Depot).	None given.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester.	No change.
44	TR.43	5.78	1	Proposed Rail Freight Terminal at Quedgeley	RAF Quedgeley is not an appropriate location for a freight terminal. It will exacerbate traffic problems.	Remove reference to a rail freight terminal being placed at Quedgeley	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester.	No change.
59	TR.43		1	Proposed freight terminal RAF Quedgeley	A railfreight development would detract from the quality of life of people in the neighbourhood through noise and air pollution.	None given.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. Pollution issues are addressed in policies FRP.10 and FRP.11. Any future planning application should ensure that neighbouring uses are protected from the impact of a rail freight terminal on the site.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
75	TR.43	5.79	1	Safeguarding of Rail freight terminal at RAF Quedgeley	Object in principle to a rail freight terminal on grounds of noise and light pollution, and increased traffic on local roads.	Remove allocation. If rail freight terminal goes ahead, the following site specific obligations should be included in policy: It should be small to serve local needs; there should be normal 5 day working not 24 hour 7 days a week; security lighting should be local, not huge arrays of arc lighting; and adequate screening should be employed - the existing poplar trees should all be retained.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. Pollution issues are addressed in policies FRP.10 and FRP.11. Any future planning application should ensure that neighbouring uses are protected from the impact of a rail freight terminal on the site.	No change.
79	TR.43		1	Safeguarding of the Railway triangle for Rail Freight terminal	A rail freight depot on the railway triangle site would increase the amount of heavy traffic passing through the city's roads.	Remove reference to railway triangle in policy TR.43. Allocate site for Youth Hospital, Quality Hotel, Housing or Open Space for recreation/sport	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. The allocation for railfreight on the Railway Triangle will be removed. However, the County Council still see this site as appropriate for railfreight use if the need arises in the future. The site shall remain an allocation for employment purposes. Policy E.3 however, allows for other uses on the site provided the developer can demonstrate that any proposal can bring a greater potential benefit to the community.	Appropriate changes to policy TR.43 are made in light of the County's railfreight study.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
103	TR.43		1	Proposed Rail Freight Terminal	A railfreight terminal would affect the quality of life of existing and future residents by nature of traffic, noise and light pollution.	Remove the allocation for a railfreight terminal at RAF Quedgeley	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. Pollution issues are addressed in policies FRP.10 and FRP.11. Any future planning application should ensure that neighbouring uses are protected from the impact of a rail freight terminal on the site.	No change.
121	TR.43	5.79	1	Proposed Rail Freight Terminal at Quedgeley	A railfreight terminal will affect the views of the countryside, and will not blend in with the local surroundings. The development would lead to an increase in HGV traffic, noise, air and light pollution for residents of Quedgeley and Tuffley.	Remove policy. However, if the railfreight terminal goes ahead, the following restrictions should apply: the terminal should serve a local need only; operating hours should be restricted to normal working hours, five days a week; the noise and pollution issues should be addressed; and the site should be suitably screened from the surroundings.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. Pollution issues are addressed in policies FRP.10 and FRP.11. Any future planning application should ensure that neighbouring uses are protected from the impact of a rail freight terminal on the site.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
134	TR.43	5.78, 5.79	1	Proposed Rail Freight Terminal at Quedgeley	Unacceptable increases in noise and heavy road traffic would create unacceptable disturbance to existing residential areas.	Delete policy	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. Pollution issues are addressed in policies FRP.10 and FRP.11. Any future planning application should ensure that neighbouring uses are protected from the impact of a rail freight terminal on the site.	No change.
159	TR.43		1	Proposed Rail Freight Terminals - Quedgeley	Rail freight is not supported by Railtrack at RAF Quedgeley due to physical constraints including connection with the network.	Delete policy.	Disagree. This site was considered as part of the County Council's railfreight study and is the preferred location for a rail freight terminal within Gloucester. The Strategic Rail Authority encourages local authorities to identify potential sites for railfreight uses.	No change.
164	TR.43		1	Rail Station and Freight Facility at Quedgeley	The railfreight and railway station issues at RAF Quedgeley are unclear. Paragraph 5.78 indicates that RAF Quedgeley will accommodate either a railfreight depot or a railway station. Policies TR.42 and TR.43 suggests the site will accommodate both proposals.	In the interests of clarity the policies should be redrafted to reflect the intention of the plan.	The County Council have now completed their study and conclude that RAF Quedgeley is the preferred location for a rail freight terminal. Consequently, the allocation for a rail station on RAF Quedgeley should be deleted.	Make appropriate changes to policy TR.43 and supporting text.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	TR.43		1	Proposed Rail Freight Terminals	RAF Quedgeley is an inappropriate location for a rail freight terminal. The policy is contrary to Government guidance in PPG12 as it does not adequately identify the land to be safeguarded for such a facility. The railway line which forms the eastern boundary is not on the core rail network. The development of railfreight facilities in this locality is not encouraged either by the SRA or in regional planning guidance. There are environmental disbenefits associated with railfreight terminals which would have an adverse effect on residential development. This includes noise, light and traffic pollution.	Revise policy to exclude reference to RAF Quedgeley.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester. Pollution issues are addressed in policies FRP.10 and FRP.11. Any future planning application should ensure that neighbouring uses are protected from the impact of a rail freight terminal on the site.	The exact boundary required for a rail freight terminal will be identified on the proposals map.
203	TR.43		1	Proposed Rail Freight Terminal	The plan cannot allocate land for two different uses (passenger station and rail freight terminal). Question the viability of a rail freight facility in Gloucester. Land at RAF Quedgeley is not suitable for a rail freight facility - it is next to a residential area.	Delete reference to a rail freight terminal at RAF Quedgeley.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
26	TR.43		3	Proposed Rail Freight Terminals	This would reduce vehicle movements in the future.	None given.	Support noted.	No change.
163	TR.43		3	Proposed Rail Freight Terminals	Support the development of a rail freight terminal at RAF Quedgeley.	None given.	Support noted.	No change.
198	TR.43		3	Proposed Rail Freight Terminal	Support the idea of a rail freight terminal at RAF Quedgeley and would hope that any intentions to safeguard a site for this use would not hinder our Clients own intentions to consolidate their business aspirations in this area.	None given.	Support noted.	No change.
201	TR.43		3	Proposed Rail Freight Terminal	Given the availability of an alternative railway station site to the south of RAF Quedgeley, an area should be specifically identified on the proposal map at RAF Quedgeley for a railfreight terminal.	Identify a specific parcel of land for a railfreight terminal at RAF Quedgeley on the proposals map.	Support noted. A specific area will be identified in the second stage deposit plan for a railfreight terminal.	No change.
66	TR.43		2	Proposed Rail Freight Terminal	New site for rail freight depot at the Docks	Allocate site at the Docks for a rail freight transfer station	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		5.79	1	Rail Freight	RAF Quedgeley cannot accommodate both a passenger station and a rail freight depot. At most it should only accommodate a passenger station. It is inappropriate to make a choice on this matter at the Second Deposit Stage. The proposals map fails to identify the land to be designated for such uses.	Delete reference to RAF Quedgeley as a potential location for a rail freight terminal.	The County Council's study has revealed that RAF Quedgeley is the preferred location for a rail freight terminal within Gloucester.	No change.
163		5.80	1	Lobleys Drive Link	The County Council's Environment Committee decided that the link should be in the form of a managed link, with signalled controlled access for buses, cars and cycles.	New policy using option 2 in para 5.80 - a managed link for Lobleys Drive Link.	As the precise details of how the traffic flows will be managed have not been identified, and there is no specific land use planning implications arising from this issue, it is considered that a new policy cannot be justified.	Amend text in paragraph 5.80 and delete paragraph 5.81.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
192		5.80	1	Lobleys Drive Link	<p>The Lobleys Link has been implemented to provide a direct road network connection to developments in Brockworth, the Gloucester Business Park and to residents in Brockworth to central Gloucester. However, we wish to raise objection to the fact that there is proposed only limited use of the link road for public transport and particularly the operation of bus priority measures. The bus priority measures are considered a key factor to support the best approach for the operation of the Link Road.</p>	<p>A new policy for the Lobleys Link Road should reflect and emphasise bus priority measures.</p>	<p>The County Council have decided that the link should be in the form of a managed linked, with signalled controlled access for buses, cars and cycles. As the precise details of how the traffic flows will be managed have not been identified, and there is no specific land use planning implications arising from this issue, it is considered that a new policy cannot be justified.</p>	<p>No change.</p>
139		5.80 and 5.81	1	Lobleys Drive Link	<p>Question the validity of introducing a policy on Lobleys Drive as the road is already in place, the authority that will determine the relevant planning application(s) is not the city council, and nor is it the Highway Authority.</p>	<p>Delete reference to a new policy on Lobleys Drive.</p>	<p>It is considered that no specific land use planning implications arise out of this issue and a new policy cannot be justified.</p>	<p>Delete reference to a new policy.</p>

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
232		5.82	2	No reference to a target for reducing private car journeys.	The absence of a target for reducing private car journeys would appear to be a major omission in the Monitoring paragraphs. There is an expectation for increasing travel by sustainable modes. If this mode of travel increases, as does the number of journeys made by private car, will the Plan be judged a success?	Introduce a target for reducing private car journeys.	The City Council receives most of the information regarding the monitoring of the Travel policies from the County Council as part of the Local Transport Plan process. There is not a Local Transport Plan target for reducing private car journeys. There is a target however, for limiting the growth of car use which will be included within the Local Plan monitoring section. This type of information is not published annually but the City Council will use the information in the context of this plan when appropriate.	Make appropriate changes to the monitoring section, paragraph 5.82.
20			2	New railway station allocation at the Railway Triangle	The best site for a railway station, avoiding the existing train reversals is the derelict land off Metz Way/Eastern Avenue. This site is more central to the population expansion of the city and offers easy access from a wide area.	Allocate Railway triangle for railway station	Disagree. The existing railway station is best located for access to city centre facilities including the bus station forming a public transport interchange (see policies TR.22, 23 & 24.).	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
166			2	New policy supporting water based freight	The Gloucester/Sharpness Canal is a designated commercial waterway, capable of moving substantial volumes of freight. Structure Plan policies T13 and T14 support the use of waterways and, in particular, protection of the Gloucester/Sharpness Canal from development which would conflict with its transport function. Use of the canal is also supported in the Local Transport Plan for Gloucestershire.	Include new policy - "Water Based Freight", supporting the use of the Gloucester/Sharpness Canal for freight transport and safeguarding sites which are suitable for transfer facilities from alternative development.	The City Council has no evidence that any demand exists for the use of the canal within the City's boundary for freight transfer.	No change.

CHAPTER 6 - Housing

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164		6.1	1	Housing - Introduction and Current Trends	Could include reference to the aim of promoting good design in new housing developments.	Suggested additional aim.	This is part of the objective of policies in the Built Environment Chapter, but a cross-reference here would be beneficial.	Add a cross reference to the Built Environment Chapter in Paragraph 6.1.
184		6.1	2	Car-free housing developments	Car-free housing developments should be encouraged in the city centre.	None specified.	Car free housing schemes in larger cities such as Edinburgh have not been entirely successful, and at the current time it is unlikely that such a scheme could be viable in Gloucester. However, the Plan does not preclude car free schemes and developers can promote such schemes within the context of the car parking Policies TR.9 and TR.10.	No change.
164		6.4	1	Targets for development on previously developed land	The expectation of 80% new housing on brownfield land is welcomed, but the text should refer to the national target of 60% by 2008 as well as the regional target.	Amend to refer to the national target.	Agree.	Amend Paragraph 6.4 accordingly.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		6.6	1	Housing Needs Survey	Considers the Housing Needs Survey findings to be inadequately justified.	Deletion of paragraph.	Disagree. The Housing Needs Survey 2000 was prepared to accord with the national guidance for the production of such surveys, and is statistically robust.	No change.
203		6.6	1	Housing Needs Survey	The number of affordable houses required on an annual basis exceeds the total amount of housing needed. This throws doubt on the validity of the Housing Needs Survey. The locational preferences expressed are meaningless without an indication of the context within which the question was asked.	None specified.	The Housing Needs Survey 2000 was prepared to accord with the national guidance for the production of such surveys, and is statistically robust. It may be useful to include additional text to clarify that the survey was based on a statistical sample across the City and not focussed simply on those in need of affordable housing.	Add additional text to explain the scope of the Housing Needs Survey in Paragraph 6.6.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162		6.7 6.8 6.10 Table 2&3	1	Housing supply and demand assumptions	There are significant omissions in regard to housing supply and demand assumptions in both statistical and physical terms. A detailed housing study of Gloucester should be undertaken to inform the Local plan to assess physical and environmental constraints and the market demand for housing. The Environment Agency should sanction this work given the assumptions about acceptance of development in the known floodplain.	Amend the text to reflect a detailed housing study.	The Housing Needs Assessment undertaken in 2000 surveyed residents needs for the future across all tenures in a robust manner. The Chesterton Reports on Housing Market Issues and Urban Capacity viability work has provided additional support for the Plan's housing strategy. The Environment Agency are a partner in the Western Waterfront development and work is progressing to resolve flooding issues for Western Waterfront schemes.	Amend text at paragraph 6.10 to refer to the Chesterton study work.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
93		6.7 to 6.15	1	Text dealing with the Housing Strategy.	Inadequate land is allocated to meet the housing requirement to 2011, or to provide adequate choice and locations to meet the full range of housing required. The Urban Capacity Study pays inadequate regard to commercial considerations in respect of deliverability and marketability, and the strategy relies heavily on the mixed use schemes at RAF Quedgeley and Western Waterfront. There is considerable doubt whether these will deliver the numbers anticipated. Additional sites could be allocated within a plan monitor and manage approach with phasing and release linked to monitoring.	None given.	Further work has now been undertaken by Chesterton on the viability of sites in the urban capacity study and further sites that have come to light in the last year. It is agreed that due to the uncertainties surrounding brownfield sites that a greater degree of potential oversupply should be included. This can be achieved without re-course to allocating any greenfield sites. Anticipated implementation is to be included as Appendix 6 to the Plan, and while this is proposed to be monitored, no phasing is considered appropriate due to the lack of greenfield allocations.	Amend housing allocations to reflect the urban capacity work and allow for a greater degree of potential over-supply of housing.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
125		6.7 to 6.15	1	Text dealing with the Housing Strategy.	Inadequate land is allocated to meet the housing requirement to 2011, or to provide adequate choice and locations to meet the full range of housing required. The Urban Capacity Study pays inadequate regard to commercial considerations in respect of deliverability and marketability, and the strategy relies heavily on the mixed use schemes at RAF Quedgeley and Western Waterfront. There is considerable doubt whether these will deliver the numbers anticipated. Additional sites could be allocated within a plan monitor and manage approach with phasing and release linked to monitoring.	None given.	Further work has now been undertaken by Chesterton on the viability of sites in the urban capacity study and further sites that have come to light in the last year. It is agreed that due to the uncertainties surrounding brownfield sites that a greater degree of potential oversupply should be included. This can be achieved without re-course to allocating any greenfield sites. Anticipated implementation is to be included as Appendix 6 to the Plan, and while this is proposed to be monitored, no phasing is considered appropriate due to the lack of greenfield allocations.	Amend housing allocations to reflect the urban capacity work and allow for a greater degree of potential over-supply of housing.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
229		6.7 to 6.15	1	Text dealing with the Housing Strategy.	Inadequate land is allocated to meet the housing requirement to 2011, or to provide adequate choice and locations to meet the full range of housing required. The Urban Capacity Study pays inadequate regard to commercial considerations in respect of deliverability and marketability, and the strategy relies heavily on the mixed use schemes at RAF Quedgeley and Western Waterfront. There is considerable doubt whether these will deliver the numbers anticipated. Additional sites could be allocated within a plan monitor and manage approach with phasing and release linked to monitoring.	None given.	Further work has now been undertaken by Chesterton on the viability of sites in the urban capacity study and further sites that have come to light in the last year. It is agreed that due to the uncertainties surrounding brownfield sites that a greater degree of potential oversupply should be included. This can be achieved without re-course to allocating any greenfield sites. Anticipated implementation is to be included as Appendix 6 to the Plan, and while this is proposed to be monitored, no phasing is considered appropriate due to the lack of greenfield allocations.	Amend housing allocations to reflect the urban capacity work and allow for a greater degree of potential over-supply of housing.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
230		6.7 to 6.15	1	Text dealing with the Housing Strategy.	Inadequate land is allocated to meet the housing requirement to 2011, or to provide adequate choice and locations to meet the full range of housing required. The Urban Capacity Study pays inadequate regard to commercial considerations in respect of deliverability and marketability, and the strategy relies heavily on the mixed use schemes at RAF Quedgeley and Western Waterfront. There is considerable doubt whether these will deliver the numbers anticipated. Additional sites could be allocated within a plan monitor and manage approach with phasing and release linked to monitoring.	None given.	Further work has now been undertaken by Chesterton on the viability of sites in the urban capacity study and further sites that have come to light in the last year. It is agreed that due to the uncertainties surrounding brownfield sites that a greater degree of potential oversupply should be included. This can be achieved without re-course to allocating any greenfield sites. Anticipated implementation is to be included as Appendix 6 to the Plan, and while this is proposed to be monitored, no phasing is considered appropriate due to the lack of greenfield allocations.	Amend housing allocations to reflect the urban capacity work and allow for a greater degree of potential over-supply of housing.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122		6.8	1	Table 2: Housing Supply	The land supply calculation should include a non-implementation allowance of 10% for allocations to take account of planning permissions lapsing, sites being developed for other uses, delays in construction etc. Further clarification is required for the windfall figure which is not based on an Urban Capacity approach. It is not necessarily realistic to assume past rates will continue, as opportunities for in-fill are finite and restrictive planning policies will frustrate opportunities.	Build in a 10% allowance for non-implementation of allocations. Provide greater clarity about assumptions for the windfall figure and revise the windfall allowance accordingly to give certainty that rates will be achieved.	Agree that a larger potential over-supply should be included in the housing land supply. A revised windfall allowance has been calculated in the light of further urban capacity work, but it is not appropriate to provide all the detail in the Plan when this is contained in the Urban Capacity Study which is published separately.	Amend housing allocations strategy to take account of further urban capacity work and allow for an increased potential over-supply.
163		6.8	1	Table 2 Housing Supply	The 200 allowance for further losses to the housing stock is unacceptable in principle. This adds to the over-supply but this is acceptable.	Amend Table 2 by deleting the allowance for losses.	Disagree. The Structure Plan no longer includes such an allowance and a figure should be included for losses such as change of use of dwellings for nursing homes which will otherwise not be accounted for.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164		6.8	1	Table 2 Housing Supply	The additional provision above that specified in the Structure Plan is welcomed. However, in view of the advice in the new RPG concentrating development on the PUA's including Gloucester, the city may wish to examine the capability of accommodating a higher level of housing provision over the plan period.	None specified.	Identification of additional brownfield sites through further Urban capacity work allows a greater potential over-supply to be built-in which is not inconsistent with Regional Guidance. It is also considered justifiable given the uncertainties over the timing of some of the opportunities allocated and the potential use of some sites for student accommodation.	Amend allocations in the light of the urban capacity work to provide an increased level of potential over-supply using previously used land and amend text accordingly.
CHAPTER 6				T = TYPE	1 - Objection	2 - Omission	3 - Support	

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		6.8	1	Table 2 Housing Supply	Reference to an allowance for losses is welcomed but should be explained and justified. There is no explanation of the windfall allowance when the impact of the Plan may be a reduction in their contribution. The level of over-supply represents 6.6% of the remaining requirement and this is inadequate given the serious doubts about the deliverability of some proposals, especially the Western Waterfront. The allowance should be increased to about 12% or 620 dwellings and the additional dwellings provided in the one location where deliverability is certain; RAF Quedgeley.	Revise Table 2.	The allowance for losses is explained in the text of paragraph 6.8. It is agreed that a higher level of potential over-supply is appropriate. A revised approach to the phasing of RAF Quedgeley is now proposed which will add to the numbers deliverable at this site in the plan period subject to the completion of the South West By-pass. The windfall allowance has been re-calculated and reduced and is explained in the Urban Capacity study which is published separately. A full explanation would be too detailed for inclusion in the Plan.	Amend allocations and windfall allowance in the light of the urban capacity work, and provide an increased level of potential over-supply using previously used land. Amend text and Table 2 accordingly.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203		6.8	1	Table 2 Housing Supply	The windfall allowance appears over-generous given the likely impact of the Plan's policies. The Plan makes in-sufficient allowance for non-implementation.	None specified.	The windfall allowance has been recalculated in the light of further urban capacity work and a reduced figure is now appropriate. An increased allowance for non-implementation is considered appropriate and can be achieved utilising additional previously used land identified in further urban capacity work.	Reduce the windfall allowance in accordance with the further urban capacity work and build into the strategy a greater potential over-supply to allow for uncertainties and support RPG strategy.

CHAPTER 6 T = TYPE 1 - Objection 2 - Omission 3 - Support

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204		6.8	1	Table 2 Housing Supply	The inclusion of a fixed housing total is not supported and is contrary to Government advice in PPG11. An annual rate should be used as part of the Council's general housing provision policy and its approach to phasing (see New Housing Policy and H.3). The approach to windfalls is not clearly set out and the figure may include greenfield windfalls which is contrary to PPG3, and the possibility of double counting since the urban capacity work should reduce large windfall sites.	The text should set out the methodology for calculating windfalls. A discount rate of at least 75% should be applied to the large windfall trend rate, and greenfield windfalls should be excluded.	Windfalls have been recalculated and reduced in the light of further urban capacity work. It is inappropriate to describe the methodology in the Plan since it is too detailed and it is included in the Urban Capacity Study which is published separately. It is not agreed that an annual housebuilding rate should be included since, at a local level, rates fluctuate widely and such an approach would only bring pressure to release easy greenfield sites in periods of low completions. The housing total figure stems from the approved Structure Plan and while this is fixed the Plan now provides for a significant potential over-supply using brownfield sites which is considered consistent with the RPG.	Amend the allowance for windfalls and cross refer to the Urban Capacity Study in the text of Paragraph 6.8.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
212		6.8	1	Table 2 Housing Supply	There is double counting between small site identification and windfalls. It is unclear how the table relates to the Urban Capacity Study. A minimum of 10% over-supply should be allowed to cater for non-implementation of some sites.	Amend the table and clarify the text.	Windfalls have been re-calculated in the light of further work on the urban capacity study. A reduced figure is proposed to take account of the reduction that may occur due to the allocation of brownfield sites with a capacity in excess of 10 dwellings in the Plan. It is agreed that a larger over-supply should be built into the Plan and the further sites that have come to light through the urban capacity work enables this wholly through the use of previously used sites.	Amend the allowance for windfalls in Table 2 and build in a greater over-supply in the housing strategy.
66	Table 3	6.9	1	Housing Commitment Site 2 Land at India Road	Needed in 50 years time for road scheme. Allow employment use in the interim.	Amend to reserve for future ring road scheme.	The land already has planning permission and would be prohibitively expensive to purchase. The Plan can only reserve land for road infrastructure identified in the Structure Plan. The Planning system only looks ahead 15 years due to the uncertainties over the longer term.	No change.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	Table 3	6.9	1	Housing Commitment Site 6 Land at Hamer Street	Needed in 100 years time for road scheme. No permanent structures in the interim.	Amend to reserve for future ring road scheme.	The land already has planning permission and would be prohibitively expensive to purchase. The Plan can only reserve land for road infrastructure identified in the Structure Plan. The Planning system only looks ahead 15 years due to the uncertainties over the longer term.	No change.
66	Table 3	6.9	1	Housing Commitment Site 11 Bodiam Avenue	Reduce number of houses and confine to the eastern part of the site, reserving land alongside the A.38 for long term highway improvements.	Reduce the commitment by cancelling the existing planning permission.	The land already has planning permission and would be prohibitively expensive to purchase. The Plan can only reserve land for road infrastructure identified in the Structure Plan. The Planning system only looks ahead 15 years due to the uncertainties over the longer term.	No change.
67	Table 3	6.9	1	Housing Commitment Site 11 Bodiam Avenue	The commitment on this site ignores local concerns regarding flooding issues on Daniel's Meadow. The new Government Guidance on floodplains implies that Daniel's Meadow should be protected.	None specified.	Flooding and surface water issues were taken into account when this application was considered. The Environment Agency raised no objections.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	Table 3	6.9	1	Housing Commitment Site 13 Land at Hempsted (west)	Should be six-storey terraced development.	Amend the commitment.	Planning permission has already been granted and is being implemented, and would be prohibitively expensive to revoke. The location is inappropriate for very high density housing in any case.	No change.
66	Table 3	6.9	1	Housing Commitment Site 14 Land at Hempsted Lane	Provide more dwellings on part of the site to avoid squandering land. Reserve northern part of the site for vital new road infrastructure. Amend plan to allow for new access bridge from Bristol Road opposite Tuffley Avenue and include mixed use at the southern end of the site.	Cancel the existing planning permission.	Planning permission has already been granted and is being implemented, and would be prohibitively expensive to revoke. The Plan can only reserve land for road infrastructure identified in the Structure Plan.	No change.

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167		6.9	1	Table 3 Housing Commitments	The relationship to Table 2 is inadequately explained. The Co-op Creamery site is included here and as an employment commitment and should not be in both. The 118 dwellings at Bakers Quay should not be included since the planning permission lapsed in 1999 . The prospects for implementation are very slight and the Planning Obligations will need to be renegotiated due to PPG3. The sites 17, 18, and 19 should be shown on the Proposals Map so that consultees can make a meaningful response and the suitability of sites can be properly evaluated.	Revise the text accordingly.	The link between the tables would be clearer if the title of Table 3 indicated that it is a list of the "large sites". The Co-op Creamery site has permissions for both office and housing use and sufficient flexibility has been allowed by other allocations to allow for its potential development for either use. The Bakers Quay site has not lapsed as it is an "Other Firm Commitment" where the legal agreement has not been completed. This site has good prospects for housing development and reference to past proposals promotes interest. It is however inappropriate to identify these commitments in the Western Waterfront as the aim is to allow flexibility to enable the market to bring forward a variety of mixed use proposals.	Amend the title to Table 3 to refer to "large sites".
203		Proposals Map	1	Incorrect boundaries	The southern boundary of the Bodiam Avenue commitment (HC.11) should be further south. The part of MU.5 west of the A.38 is incorrectly drawn.	Amend the Proposals Map accordingly.	Agree.	Amend the boundaries of site MU.5 and HC.11 on the Proposals Map accordingly.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		6.10	1	Urban Capacity Study	Urban Capacity Studies should identify particular sites whose capacity to accommodate new housing is assessed, and should identify the extent to which such sites can contribute to meeting the housing requirement. The study currently only identifies Western Waterfront as a whole and the expected capacity and yield are not justified. The advice in "Tapping the Potential" has not been followed and requires a detailed site specific approach.	Delete this paragraph until an adequate detailed appraisal of Western Waterfront has been carried out.	The Urban Capacity Study has now been taken further with input from Chesterton on viability and availability. Opportunities within Western Waterfront have been considered on an individual basis. The Housing Strategy and allocations have been up-dated to reflect this work.	Amend Paragraph 6.10 to refer to up-dated Urban Capacity Study.
200		6.10	1	Text relating to Policy H.1	Whilst the Urban Design Strategy and Western Waterfront documents emphasise the regeneration potential of Gloucester's 4Km of waterfront, there is no single Local Plan policy dealing with the Waterfront and its environs.	Make reference to the importance and regeneration contribution of the inland waterways in the reasoned justification to Policy H.1 MU.2.	Agree.	Add text regarding the regeneration potential of the waterfront to Paragraph 6.10.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
201		6.10	1	Urban Capacity Study	The Urban Capacity Study should more closely reflect Government guidance. The current approach does not follow the sequential approach advocated in PPG3. The Study should concentrate on previously used land within the urban area. The current primacy given to "brownfield land outside the central area" is inappropriate given that it includes land outside the urban area, such as RAF Quedgeley. The Study should be more transparent about its approach to its methodology.	Amend the Urban Capacity Study sequential approach to reflect Government guidance and revise the priority accorded to potential sites accordingly.	The Urban Capacity Study has been up-dated taking account of viability and availability work undertaken by Chesterton, and has been altered to more closely reflect Government advice. Sites at RAF Quedgeley are still given a priority by virtue of Quedgeley being a "strategic site" in terms of the guidance in Planning To Deliver due to the Structure Plan reference.	No further change.
203		6.10	1	Urban Capacity Study	The capacity study undertaken does not appear to follow the advice in "Tapping the Potential".	None specified.	The Urban Capacity Study has been revised and up-dated including input on viability and availability from Chesterton, to more closely reflect Government advice.	No further change.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204		6.10	1	Urban Capacity Study	<p>The objector has carried out its own Urban Capacity Study which has shown there is likely to be additional capacity over and above that identified in the Plan. However, many of the sites may not be deliverable. The Council's current study does not take a sufficiently pro-active role in bringing sites forward, and some sites have been set aside without full assessment and with only limited justification as to why the sites have not been included in the Plan. The Study is limited in its scope and fails to demonstrate that the PPG3 search sequence has been robustly undertaken.</p>	<p>Review the capacity study in the light of the objector's study conclusions regarding the potential for identifying additional capacity, the need to take a more pro-active role, the opportunity to further concentrate development within the urban area, removing the need to release greenfield land at RAF Quedgeley and enabling increased employment allocation at that site to meet strategic employment land needs. As part of the review include assessments of all sites within the study.</p>	<p>The Urban Capacity Study has been revised and up-dated including input on viability and availability from Chesterton, to more closely reflect Government advice. This work cannot be compared to the objector's study as they have declined to provide details. Despite the identification of more brownfield capacity it is not sensible to hold back greenfield land at RAF Quedgeley since this is a "strategic site" in terms of the guidance in "Planning to Deliver" and helps to fund the road infrastructure that will underpin the success of brownfield development in the centre of the city.</p>	<p>No further change.</p>

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167		6.11	1	RAF Quedgeley Greenfield element	Inappropriate emphasis is given to the perceived greenfield element and it implies that RAF Quedgeley's development is in some way less important than that of the Western Waterfront. However, the city's own figures acknowledge that it will make a greater contribution to the housing requirement.	Revise the paragraph accordingly.	Development in the centre of the city is still considered to be a higher priority but the importance of the RAF Quedgeley site is now recognised by its definition as a "strategic site" and the removal of the phasing link to the Western Waterfront reflecting the advice in "Planning to Deliver".	No further change.
167		6.12	1	RAF Quedgeley and the South West Bypass	This paragraph is insufficiently precise about the relationship between the development at Quedgeley and the completion of the South west By-Pass.	Revise the text.	The text requires up-dating to reflect the new position on commencing development at RAF Quedgeley in advance of completion of the new Road and a cross reference to the relevant Travel Policy has been added in the new text at Paragraph 6.14a relating to the housing strategy.	Amend Paragraph 6.12 to reflect the up-to-date position.
170		6.13	1	Text relating to Woolstrop Cottage.	As the site of a recently burnt down dwelling situated at the heart of a residential area the land is clearly suitable for housing.	Delete this paragraph.	Under Policy H.2 It is proposed to delete this allocation and re-introduce a Public Open Space allocation under Policy OS.7 with additional text in that chapter. This paragraph is therefore no longer needed.	Delete Paragraph 6.13.

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122	H.1		1	Allocations for Mixed Use Including Housing	This policy is not concise and conflicts with the intentions of PPG12 to avoid lengthy, over-detailed Plans. The identification of specific planning obligations prejudices negotiation of planning agreements contrary to Government advice in Circular 1/97.	Delete the policy and either set out in the supporting text or publish as Supplementary Planning Guidance.	Disagree. The Policy is not over-detailed and only includes essential wording to explain how the policy will be applied in making development control decisions. It would be contrary to advice in PPG 12 to defer these items to Supplementary Planning Guidance. The level of contributions on many of the site specific obligations is open to negotiation at the planning application stage.	No change.
132	H.1		1	Allocations for Mixed Use Including Housing	The housing numbers exceed what can reasonably be expected. RAF Quedgeley should include a large proportion of employment.	Allocate additional sites.	Housing capacities have been reconsidered in the up-date of the Urban Capacity Study which has included housing market and viability work by Chesterton. Additional allocations have been made on previously used land to increase the level of flexibility for housing delivery (see amended paragraph 6.8 and 6.14b). More employment land is now being allocated at the rear of Waterwells Farm which, with the allocation at RAF Quedgeley, is considered to give an adequate level of supply in this strategic location.	No further change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
148	H.1	6.10	1	Allocations for Mixed Use Including Housing	Emphasis on providing housing in the centre should be balanced with the need to provide for a strong commercial centre, including employment opportunities near to the public transport hub. The level of housing anticipated in the centre is questionable on grounds of demand for the accommodation. Concerned that the 80% target for brownfield development is high for a city with less need for urban renewal than others.	Re-draft policy to more accurately predict an appropriate and realistic level of housing provision in the central area in particular, and brownfield generally.	The level of housing proposed in the centre in mixed use schemes is not considered to undermine, but support the commercial role of the centre. Chesterton advise that there is little market for office development in the centre. The Housing Needs Survey 2000 showed a good level of potential demand for central area housing. Disagree that Gloucester has less need for urban renewal, and the urban capacity study indicates that there is potential to achieve a high percentage of brownfield development.	No change.
167	H.1		1	Allocations for Mixed Use Including Housing	Planning briefs should involve developers rather than simply being prepared by the Council as the opening paragraph suggests. The Proposals Map does not even indicate the broad disposition of land uses at RAF Quedgeley. The approach to briefs will add to delays to the start of the development.	Re-draft the paragraph.	It is the intention that Planning Briefs can be prepared by developers for City Council approval, and amending the text to make this clear is desirable. Although it is now proposed to define the area for Rail Freight since this has been firmed up and agreed, it is considered desirable to allow flexibility for the distribution of other uses which will be more properly fixed through the planning brief process.	Amend opening paragraph to Policy H.1 to allow for planning briefs to be prepared either by developers or the city council.

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203	H.1		2	Allocations for Mixed Use Including Housing	Opening paragraph should simply refer to the Council seeking "Planning obligations in accordance with the advice in Circular 1/97"	Amend the text accordingly.	Disagree. It is inappropriate to refer or quote directly from Government Circulars since they may change during the life of the Plan. In addition the proposed wording is too vague and would be unhelpful to the development process.	No change.
28	H.1		3	Allocations for Mixed Use Including Housing	The policy clearly defines where development can take place. The development of the sites will contribute to the appearance and sustainability of the city.		Support noted. Further previously used sites have now been added to the allocations following further work on the Urban Capacity Study.	No change.
168	H.1		1	Allocations for Mixed Use Including Housing Site MU1 Blackfriars	The mixed use should not be primarily shopping.	None specified.	In the light of the current circumstances in respect of the Blackfriars scheme, it is considered that the Blackfriars area should now be included as a character area within the Western Waterfront allocation. However, it remains the best location to expand the primary shopping area and links together the star attractions of the Cathedral and Docks areas.	Delete MU.1 as a separate site and include within MU.2 Western Waterfront.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
193	H.1		2	Allocations for Mixed Use Including Housing Site MU.1 Blackfriars	Cannot understand the emphasis on Blackfriars when the central area is in a terrible state of decline. The emphasis must be on regenerating the centre and cleaning it up. Furthermore there should be some limited free parking in the centre like Cheltenham.	Halt plan for Blackfriars and concentrate on the historic city centre to complement the Cathedral. Provide limited free parking.	Although the Blackfriars scheme has had difficulties there is a need for new shops of a size to meet modern needs which are difficult to provide in the historic gate streets. It is now proposed to include blackfriars area into the Western Waterfront but it remains the best location to expand the Primary Shopping Area. Car Park charging is not a Local Plan matter.	No further change.
131	H.1		1	Allocations for Mixed Use Including Housing Site MU.2 Western Waterfront	The policy should clarify the situation in respect of the Cattle Market relocation. If this is off-site then it perhaps should be a site specific obligation.	Amend to clarify the position in respect of the Cattle Market.	The Cattle Market has now permanently closed on the St. Oswald Site and the lease surrendered.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	Given the level of constraints it may be unrealistic to expect 1000 units from this area.	Provide additional justification for the delivery of 1000 dwellings within the Plan period.	The Urban Capacity Study has been up-dated including input from Chesterton on viability and availability. Their study of opportunities within the Western Waterfront concluded that a much higher figure could be completed within the Plan period. A more cautious increase to 1500 dwellings, allowing for a greater degree of flexibility, is now included in the Plan.	No further change.
148	H.1		1	Allocations for Mixed Use Including Housing - Site MU2 Western Waterfront - additional allocation of land to the north of the Cattle Market.	Land at Sandhurst lane should have been included within the Western Waterfront allocation to ensure a comprehensive approach to this whole area. The land has been considered for development in the past, is suitable for development, and was identified in the Issues Papers, and with the Cattle market as an area of change in the Urban Design Strategy..	Amend the Policy H1 Site MU2 to include the Sandhurst Lane area, and include it on the Proposals Map.	This site (see Plan OBJ3) is greenfield and is in the floodplain. Further work on the Urban Capacity Study has confirmed that no greenfield allocations are required this Plan period. The site was not identified in the Urban Design Strategy.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
161	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	The area to the north east of Walham Lane (about 9 acres) should be included in the Western Waterfront area to enable comprehensive development to be considered in the Brief referred to in the introduction of the policy. This land is "white land" lying outside the floodplain, and could provide the best opportunity for safe access to the cattle market redevelopment.	Amend the policy to refer to this land and amend the boundary of MU.2 on the Proposals Map.	This site (see Plan OBJ3) is greenfield and is in the floodplain. Further work on the Urban Capacity Study has confirmed that no greenfield allocations are required this Plan period. Satisfactory access arrangements were include in the recent Cattle Market application.	No change.
162	H.1		1	Allocations for Mixed Use Including Housing Site MU.2 Western Waterfront	The site is in the floodplain, and although improvements could be made as indicated by the Environment Agency, the site may not be able to deliver the dwelling numbers expected. Bad neighbour uses also have to be relocated and there is no evidence that the land can be assembled to enable development within the Plan period.	None specified.	The Urban Capacity Study has been up-dated including input from Chesterton on viability and availability. Their study of opportunities within the Western Waterfront concluded that a much higher figure could be completed within the Plan period. A more cautious increase to 1500 dwellings, allowing for a greater degree of flexibility, is now included in the Plan.	No further change.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	The Westgate Island proposals should include some residential. Contributions under Circular 1/97 are requirements.	Amend third bullet point in the Site Specific Obligations to say "requirements".	The policy is already worded to seek mixed use schemes across the Western Waterfront and therefore this implies some residential in the Westgate Island area would be appropriate. All of the bullet points are expected to be the subject of planning obligations and it is unnecessary to include the word "requirements".	No change.
164	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	Given the scale of development the Plan may wish to specify obligations to provide a contribution to education and contribute to public transport provision. PPG25 advises that developers should fund the provision and future maintenance of flood defence works, and this should be reflected in the site specific obligations.	Add to and amend the site specific obligations.	The need for contributions towards education and public transport is covered by other general policies in the Plan and this is explained in paragraph 6.15. Adding references to these and such items as affordable housing to every site would add to the length and detail of the Plan.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	H.1		1	Allocations for Mixed Use Including Housing Site MU.2 Western Waterfront	Inappropriate to allocate 66 hectares when for the most part redevelopment is not proposed and existing uses are likely to remain unchanged. The Plan must list, and the Proposals Map identify the sites within the Western Waterfront where housing and other specific uses are proposed. Failure to do this adds to the argument that the capacity of the area and the deliverability of 1000 houses in the plan period is uncertain. Objection is also raised to the reference to a mix of house types across the site when the characteristics of this area would indicate that flats and apartments will dominate.	Re-draft the policy.	The allocation of a large site is helpful to allow flexibility for a variety of mixed use schemes to emerge. Chesterton has assessed the range of opportunities within the area as part of their work on Urban Capacity and concluded that a much higher number of dwellings could be achieved in the Plan period. A more cautious increase to 1500 dwellings, allowing for a greater degree of flexibility, is now included in the Plan. The obligation relating to a mix of housing types is superfluous given general Policy H.8 and can be deleted. However, in this large area a mix should be sought and Chesterton's report on the Housing Market indicates that housing other than flats may be suitable in some parts of the site.	Delete the first obligation in MU.2 dealing with housing mix.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	The site should be extended southwards to include the housing commitments at Hempsted and the British Telecommunications site south of Hempsted Bridge. The site will become available for development in the early part of the plan period and is suitable for housing or retail development, and an ideal opportunity to provide the needed foodstore identified in policy S.6.	Extend the Western Waterfront allocation southwards.	Disagree. The Western Waterfront allocation includes under-used land in the centre of the city that can secure the regeneration of the centre. Land further south adjacent to Hempsted is a greenfield housing development that is nearly complete and does not contribute to the aim of regeneration in a significant way. The BT depot south of Hempsted Lane (see Plan OBJ10) is within the cordon sanitaire for the Netheridge sewage Works and is unsuitable for housing development. The proposed foodstore is considered in the Shopping chapter.	No change.
196	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	There is no reference to the provision of community facilities, including health facilities. The scale of new housing suggests that additional health facilities may be required on site or in the local area.	Add "community facilities and services" to the list of uses in the paragraph under Policy H.1 Site MU.2 Western Waterfront.	Agree.	Add community facilities and services to the mix of uses in site MU.2.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
199	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	Support the principle of mixed use development but object to the site specific obligation to provide a bridge across the entrance to Monk Meadow Dock. The detailed layout of this area has yet to be completed and the feasibility of a bridge has not been determined.	Delete the obligation to provide a bridge across the entrance to Monk Meadow Dock.	Given the width of Monk Meadow Dock it may be that a bridge link will be unfeasible. The last part of the final site specific obligation should therefore be amended to reflect this.	Amend the latter part of the obligation in MU.2 relating to a bridge across Monk Meadow Dock to refer to feasibility.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	Proposals Map should identify which parts are allocated for housing. The indicative capacity is questioned and suspected to be substantially less given commercial use proposals eg. at Westgate Island. The ability of the site to provide a mix of house types is questioned. The need for a contribution to the South West By-pass should be made clear.	Amend the Proposals Map to show housing elements, allocate more sites for housing to provide range and choice to ensure housing needs are met by the end of the Plan period, and amend the policy to make the need for a contribution to the South West By-pass clear.	Disagree. The allocation of a large site is helpful to allow flexibility for a variety of mixed use schemes to emerge and it is inappropriate and unnecessary to highlight specific sites or buildings for residential use. Chesterton has assessed the range of opportunities within the area as part of their work on Urban Capacity and concluded that a much higher number of dwellings could be achieved in the Plan period. A more cautious increase to 1500 dwellings, allowing for a greater degree of flexibility, is now included in the Plan. It is considered that the range of opportunities included within the Plan allows sufficient choice of site, and an expected implementation that will achieve Structure Plan figures (see new Paragraph 6.14b and Appendix 6). The obligation in MU.2 relating to a mix of housing types is superfluous given general Policy H.8 and can be deleted. However, in this large area a mix should be sought and Chesterton's report on the Housing Market indicates that housing other than flats may	Delete the first obligation in MU.2 relating to housing mix.

be suitable in some parts of the area. Contributions to the South West By-Pass are covered by general policy TR6 and it would add to the length and detail of the Plan to duplicate this here. This is

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	The principle of redeveloping the Western Waterfront is supported but there is a concern that the future of this area is uncertain until the Environment Agency has published its study of the floodplain. Reference is made to the strong policy guidance on development in floodplains set out in PPG25, and the need to be fully satisfied on this issue if the site is to be retained in the Plan. Failure of part of this site to come forward would require other sites to be considered.	Amend the Policy to clarify which parts of the Western Waterfront floodplain area are proposed for housing and provide full evidence that redevelopment would not interfere with floodplain flows or compromise river management options. Evidence should also be given to show that the area will be suitably defended. If this can't be done delete those parts of the Western Waterfront in the floodplain and allocate alternative sites with a greater certainty of development.	explained in Paragraph 6.15 The City Council and landowners/developers in the Western Waterfront are working with the Environment Agency to clarify the works needed to ensure the housing within the area is properly protected from flood events and there is no reason to doubt that an acceptable scheme can be achieved. However, the type of scheme to be implemented has yet to be determined and this should be reflected in the wording of the text at Paragraph 6.10.	Amend the reference to flood schemes in paragraph 6.10.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	H.1		1	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	The reference to obligations for centralised residents parking is unclear.	Provide clarification.	This obligation is aimed at promoting high density, possibly car-free, housing development where residents car parking is located in eg. a multi storey car park serving a wider area and providing space for a range of uses including public visitor parking. Consider the obligation is clear.	No change.
200	H.1		3	Allocations for Mixed Use Including Housing Site MU2 Western Waterfront	Welcome the allocation and the wide ranging statement to realise the comprehensive redevelopment of the Western Waterfront area. The mixed use is essential to deliver a viable regeneration initiative.		Support noted.	No change.
168	H.1		1	Allocations for Mixed Use Including Housing Site MU3 Bus Station and Market Parade.	The site should be expanded to include the area bounded by Market Parade, Northgate Street, and Aldate Street and allocated for mixed-use development principally for shopping.	Extend the site area and re-define principally as a shopping development.	This site is not so well placed to deliver regeneration as the Blackfriars site. In addition enlarging the site would only include active and recently re-furbished buildings that would delay a major comprehensive development from coming forward.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
31	H.1		1	Allocations for Mixed Use Development Including Housing Site MU4 Part of British Energy Site at Barnwood	Housing on this site would result in an unacceptable increase in traffic congestion on Barnwood Road.	Put in a new road linking Barnwood Road to the C & G Roundabout, bypassing the Walls Roundabout, or adequate measures to ensure that Barnwood Road can cope with the extra traffic. If this cannot be done, then remove the allocation.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
35	H.1		1	Allocations for Mixed Use Including Housing Site MU4 Part of British Energy Site at Barnwood.	New housing will 'hem in' existing housing; there could be increased traffic on side roads to the danger of members of the public; increased traffic congestion on roads into the city centre; new houses will need new community facilities that cannot be provided locally.	Remove allocation.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
47	H.1		1	Allocations for Mixed Use including Housing Site MU4 Part of British Energy Site	Increased traffic on Barnwood/Hucclecote Road	Ensure access is from the dual carriageway.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
51	H.1		1	Allocations for Mixed Use Including Housing Site MU4 Part of British Energy Site.	More traffic, noise and pollution on Barnwood Road would not be acceptable.	Use Barnwood By-pass for access.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
60	H.1		1	Allocations for Mixed Use including Housing Site MU4 Part of British Energy site.	There has been a trend of building houses close together and with very small gardens which has been detrimental to society. This type of housing here would be strongly opposed.	-	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
61	H.1		1	Allocations for Mixed Use including Housing Site MU4 Part of British Energy Site.	Housing would overlook existing properties.	Remove the housing allocation.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
65	H.1		1	Allocations for Mixed Use Including Housing Site MU.4 Part of British Energy site.	Although residential use is limited development in this area could have a material impact on the Trunk Road Network (specifically the A417) and this impact has yet to be fully assessed.	None given.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
86	H.1		1	Allocations for Mixed Use Including Housing Site MU4 Part of British Energy Site	Access to the site from Insley Gardens would add to existing traffic problems and provide a short cut to businesses on Barnet Way.	Ensure access is only from Barnet Way and Barnwood Road.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
120	H.1		1	Allocations for Mixed Use Including Housing Site MU4 Part of British Energy Site	Object to Insley Gardens being connected to the development which would be used as a short-cut to the business park and food store. This would increase traffic flow on Insley Gardens which has an uncontrolled junction with Hucclecote Road, causing congestion and danger to residents, particularly children..	Access the housing from a link road from Barnwood Road to Barnet Way.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.

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160	H.1		1	Allocations for Mixed Use Including Housing Site MU4 Part of British Energy Site	Support the allocation in principle but object to some of the policy details. Opening paragraph - agree that a development brief is, in many cases, an appropriate framework for guiding development but there should be some flexibility. In MU.4 - the whole of the site measures 12.3 ha, not part. The reference to "limited" housing is unnecessarily restrictive since the text in the policy makes it clear that the site is primarily for employment. The Indicative Capacity section has omitted the word "dwellings". In the site specific obligations the term "retention" of recreation facilities is unduly restrictive, because, although the redevelopment may involve the loss of some of the existing open space and facilities, satisfactory replacement, with public access, will be provided.	Amend opening paragraph of the policy to say development briefs will "normally" be required. Amend MU.4 site description by deleting "Part of". Delete the term "limited" from the description of the development. Add the word "dwellings" after 110. Delete the word "retention" from the first obligation.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
174	H.1		1	Allocations for Mixed Use Including Housing Site MU.4 Part of British Energy Site	The housing will add to traffic congestion on Barnwood Road. Local Primary Schools are full which will lead to more car use taking children to schools elsewhere. Pleased to note the retention of open space and leisure facilities. The Sports and social club is open to local residents and its loss would have a significant impact.	Remove the housing allocation and redevelop for commercial only with access from Barnet Way; or if housing must be included have access only from Barnett Way, reduce the number of units and expand local schools.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
181	H.1		1	Allocations for Mixed Use Including Housing Site MU4 Part of British Energy Site	New housing should be sympathetic in size and design to properties in Insley Gardens. A new access to Barnwood Road would create extreme congestion, particularly given the new development planned at Brockworth. We need to retain as much public open space as possible for future generations.	Consider access from Barnet Way, or from Insley Gardens with this road linked into the traffic light junction, with any design taking account of the traffic from Brockworth airfield..	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.
187	H.1		1	Allocations for Mixed Use Including Housing Site MU4 Part of British Energy Site	Housing would spoil the tranquility of the area adjacent to Kingstone Avenue and overlook gardens of existing property.	Remove the housing allocation.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy H.1.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
44	H.1	6.12	1	Allocations for Mixed Use including Housing Site MU5 RAF Quedgeley.	SW Bypass should be complete before any development begins at RAF Quedgeley.	Amend policy to guarantee construction of by-pass, preferably before development begins.	The County Highway Authority's view is that up to 500 houses can be completed at RAF Quedgeley in advance of the completion of the Road and this is now reflected in Policy TR.8. The contributions from the RAF Quedgeley site are important in helping to build the road and the Highway Authority consider the level of traffic increase will be manageable.	No change.
49	H.1		1	Allocations for Mixed Use including Housing Site MU5 RAF Quedgeley	The allocation of the land to the west of the A38 would be detrimental to its wildlife value. The proposed link road across this land would be elevated, cause noise and vibration to existing properties and make flooding worse.	Remove this part of the allocation.	This part of the site is not so valuable to warrant designation as a Nature Conservation Area, and is needed to provide an additional link from the new development into the existing settlement. All the matters raised are detailed issues that will be dealt with at the planning application stage (and were considered at the recent appeal).	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
54	H.1		1	Allocations for Mixed Use including Housing Site MU5 RAF Quedgeley	Housing and the new link road would be detrimental to the wildlife potential. The new road link will be elevated and would cause more noise and vibration to existing properties.	Keep number of houses to a minimum or remove allocation.	This part of the site is not so valuable to warrant designation as a Nature Conservation Area, and is needed to provide an additional link from the new development into the existing settlement. All the matters raised are detailed issues that will be dealt with at the planning application stage (and were considered at the recent appeal).	No change.
65	H.1		1	Allocations for Mixed Use including Housing Site MU5 RAF Quedgeley	The impact of this large development on the Trunk Road Network has not been adequately addressed, and nor has the interaction with other major developments around Gloucester such as at Brockworth.	None given.	This objection has now been withdrawn.	No change.
139	H.1		1	Allocations for Mixed Use Including Housing. Site MU5 RAF Quedgeley	Object on the grounds that a coordinated approach should be taken in relation to development generally to the south of Gloucester e.g.. in terms of provision of bus services, railway facilities, and education provision.	Establish mechanisms with other authorities to ensure a coordinated approach.	The City Council oppose development to the south of the city boundary and do not consider a co-ordinated approach is therefore required.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	H.1		1	Allocations for Mixed Use Including Housing Site MU5 RAF Quedgeley	There is no guarantee that this site is deliverable given the contamination, the high levels of obligations, and the fact that the area is one of archaeological interest. It is questionable whether the site will accommodate 1500 dwellings in the Plan period.	None specified.	The constraints on this site have been examined in great detail in connection with the recent planning appeal. It is considered that the site is quite capable of delivering the number of dwellings expected in the Plan (which has now increased).	No change.
163	H.1		1	Allocations for Mixed Use Including Housing Site MU.5 RAF Quedgeley.	The railway station could prevent the implementation of the rail freight facility at this site which is likely to be the preferred location for a terminal. The allocation of a new site south of Naas Lane would serve well both the RAF Quedgeley and the Hunts Grove sites. Specific obligations should be added to this allocation regarding the need to investigate mineral extraction and deal with waste issues.	Add site specific obligations on mineral extraction and waste issues.	Agree regarding the issues of rail related reserves and changes are made in the Travel Chapter to identify the freight reserve and to relocate the railway station. Disagree that the waste and minerals issues should be obligations in this Plan as they are covered by policies in other parts of the development plan for the area. However, it would be helpful to make a reference in the text.	Add a reference to Waste and Minerals Local Plans policies in Paragraph 6.11.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	H.1		1	Allocations for Mixed Use Including Housing Site MU.5 RAF Quedgeley	Object to the proposal to reserve land for a rail freight depot. Quedgeley is not an appropriate location. It is an inappropriate use close to housing due to traffic generation, noise, and light pollution. QUVL wish to work with the City and others to identify land to be safeguarded for a railway station. The capacity of the site is considerably greater than 1700 and the site should be used in a way that delivers strategic housing requirements in the plan period. Object to first obligation since other main employment locations are not specified. Confirm that the development is capable of providing adequate open space and protecting important undeveloped areas and to protect the setting of Manor Farm, as set out in the third obligation. The need for a second primary school on the site has not been finally established, and the need for a single or two form entry school	Re-draft the policy.	The objector agreed to a rail freight reserve at the recent appeal and this is now shown specifically in the Plan (see Travel chapter). The capacity has been re-calculated in the light of the reduced area for rail freight and has been increased. Agree that greater clarity is required for the employment locations referred to in the first bullet point and the term "in the central severn vale" should be added. The need for two primary schools was agreed by the objector in connection with the current appeal. The density requirement is considered to be reasonable given the size of this site and government aims to achieve a range between 30 and 50 dwellings per hectare. The capacity has been assessed by applying this average density to the expected net developable area for housing on the site.	Amend the obligation at bullet point 1 to clarify it is major employment locations in the central severn vale.

can only be determined in
the longer term. This
matter can be dealt with
by a planning condition,
rather than in obligation
five. The source of the
density figure in

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
198	H.1		1	Allocations for Mixed Use Including Housing Site MU5 RAF Quedgeley	obligation six is not clear. Given the failure to show the broad disposition of land uses on the Proposals Map the relationship between density and capacity cannot be established. The boundary of the site includes land owned by I.M.Group Ltd adjacent to the railway which is a necessary part of the storage and distribution use.	Amend the boundary of MU.5 on the Proposals Map to remove the I.M.Group land.	Agree. (This error is taken into account in the allocation of the rail freight site - see Travel chapter)	Amend boundary on Proposals Map.

CHAPTER 6 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
201	H.1		1	Allocations for Mixed Use including Housing Site MU5 RAF Quedgeley	Object to the suggestion that the new railway station and rail freight terminal are alternative options. Object to the lack of any phasing mechanism/start date in the policy. There is no reference to the provision of a development brief or the principles of development which might apply. There is no reference to any significant innovations in terms of public transport policy or sustainability - no reference to pedestrian and cycle routes, no reference to best practice in terms of building design and sustainable construction. Object to the failure to recognise the need for this development to be integrated/co-ordinated with surrounding development including Hunts Grove. Object to the failure to recognise the opportunity this presents to address the provision of major infrastructure (SWBP, railway station, rail freight terminal), improvements to other	Amend the policy accordingly.	The railway station has now been relocated from this site, and a rail freight site defined (see Travel chapter). The expected start date is now indicated in Appendix 6, and does not need repeating in this policy. The need for a development brief is covered in the introductory paragraph of the policy. It is agreed that it would be useful to refer in the text to the opportunity for this site to be developed using the latest innovations in sustainable construction and transport. Agree that reference ought to be made to the need to integrate the site with neighbouring development, but the need to include Hunts Grove is not accepted since it is opposed in principle by the City Council.	Add an obligation to MU.5 referring to integration with surrounding development. Add text to Paragraph 6.11 regarding the opportunity to employ innovative techniques in the development of the site.

modes of travel (including
subsidy to public
transport between South
Gloucester and the
centre), the availability of
community and social
facilities (including a

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	H.1		1	Allocations for Mixed Use Including Housing Site MU5 RAF Quedgeley	secondary school) and major sustainability initiatives(eg. a combined heat and power to serve the new development areas may be viable). Indicative capacity underestimates the capacity of the site. No justification is provided for the density figure included in the policy.	None specified.	The capacity of the site has increased due to the reduction in area of the site for rail freight. The density requirement is considered to be reasonable given the size of this site and government aims to achieve a range between 30 and 50 dwellings per hectare. The capacity has been assessed by applying this average density to the expected net developable area for housing on the site.	No further change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	H.1		1	Allocations for Mixed Use Including Housing Site MU5 RAF Quedgeley	The objectors own Urban Capacity Study has shown there is likely to be a sufficient supply of previously developed land in Gloucester to meet the current Structure Plan target. A pro-active approach by the Council is required to achieve the urban renaissance objectives, but if successful there is no need to release the greenfield element at RAF Quedgeley (ie. About 600 houses). In any event the 1500 dwellings is unlikely to be achieved given a start date of 2004 and realistic assumptions about build rates, and if the current level of allocation is retained in the Plan it will be necessary to identify additional sites.	Amend MU.5 to identify only the previously developed land. Re-examine the urban capacity and provide full assessments of each site to comply with the PPG3 search sequence. If greenfield land is allocated at RAF Quedgeley it should be phased towards the end of the plan period.	The City Council's up-dated Urban Capacity Study shows that there is a need for significant development at RAF Quedgeley in the Plan period. The objectors have declined to provide details from their alternative study. The capacity of the RAF Quedgeley site has been increased and it is now identified as a "strategic site" in terms of the guidance in "Planning to Deliver", reflecting its status in the Structure Plan. It would be impractical to try and exclude the greenfield elements and not develop the site in a comprehensive manner. The number of houses expected from this site in the period to 2011 has been increased, and more information is included in Appendix 6 of the Plan. This is considered to reflect realistic build rates.	No further change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	H.1		1	Allocations for Mixed Use Including Housing Site MU.5 RAF Quedgeley	<p>Although this site was allocated in the Structure Plan, PPG3 has now been published which sets out a search sequence to be adopted. Although the Plan notes that development in the central area is preferable to development at RAF Quedgeley, the Plan allows the site to be developed in tandem with city centre developments. The phasing approach is unlikely to be achievable and there is a risk that development at the RAF Quedgeley site will progress in advance of city centre schemes, threatening projects over the long term. There is concern at the Council's prioritization of RAF Quedgeley when alternative urban extension developments have the potential to deliver greater sustainability. Despite the links to the Quedgeley District Centre the RAF site is quite isolated with the A.38 and Daniels Brook providing barriers to adjacent areas. The</p>	<p>Re-draft policy to make it clear that any development at RAF Quedgeley does not take place in advance of sequentially preferable sites in the city centre or other urban extension locations that can offer enhanced sustainable development opportunities. The Council should re-appraise its housing allocations in the light of recent advice to ensure conformity with the search sequence and the promotion of sites that bring sustainable benefits to the city.</p>	<p>This site is now regarded as a "strategic site" in terms of the guidance in "Planning to Deliver" given the reference in the Structure Plan. It is not accepted that there are preferable urban extensions elsewhere. The site's contribution to the construction of the South West By-pass, which will assist in the full implementation of regeneration in the centre of the city, together with its significant contribution to the housing figures means that its development alongside central opportunities is acceptable. The advice from Chesterton on the Gloucester Housing Market is that the impact from development at Quedgeley on central area proposals will be limited, and this has led to the removal of the phasing policy linking this site to completions in the Western Waterfront. It is considered that the site will be satisfactorily linked to neighbouring areas, although an additional obligation to ensure the development is well integrated is desirable.</p>	<p>Add an obligation to MU.5 referring to integration with surrounding development.</p>

development cannot
achieve good links
and, given the distance
from the city centre, will
not provide a sustainable
new community for
Gloucester.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
135	H.1	6.15	3	Allocations for Mixed Use Including Housing Site MU5 RAF Quedgeley	Inclusion of reference to place of worship		Support noted.	No change.
198	H.1		3	Allocations for Mixed Use Including Housing Site MU5 RAF Quedgeley	The site is an appropriate location for new residential development as part of an overall mixed use development.		Support noted.	No change.
34	H.1		2	Allocations for Mixed Used Including Housing.	The land to the north of Brionne Way is omitted.	Allocate part of the land to the north of Brionne Way.	This is a greenfield site on the edge of the city (see Plan OBJ 1) which is not required for development in the period to 2011. The area is within the Longford Sewage Works Cordon Sanitaire which will preclude potential development for housing until it is permanently closed.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
6	H.1		2	Allocations for Mixed Use Including Housing	Gloscat sites east and west of Brunswick Road are omitted from policy.	Allocate these sites.	Agree. These sites will be released on the relocation of Gloscat within the Western Waterfront and they are suitable for mixed use with a significant element of residential development. Development must only however be allowed subject to a relocation of the college to a satisfactory location in the centre of the city.	Add the Gloscat sites to Policy H.1 with a suitable obligation for the relocation of the college.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
93	H.1		2	Allocations for Mixed Use Development Including Housing - Omission of land at Winneycroft Farm	The previous Local Plan Inspector confirmed that the western part of the site could be developed and this could add to the choice of locations for house buyers. PPG3 identifies urban extensions as the highest priority where greenfield land release is required. Winneycroft Farm is well located in respect of facilities at Matson and has easy bus access to the higher order facilities in the city centre and employment. This part of the city would benefit from additional employment to achieve a closer relationship between homes and jobs, and the site could include an element of employment land. A comprehensive strategy for the site could identify land to be kept permanently open to meet landscape and public open space objectives.	None given.	This site (see Plan OBJ2) is designated as part of the important Landscape Conservation Area between Robinswood Hill and the Cotswold escarpment. It is also greenfield. Notwithstanding the objection on landscape grounds (see Natural Environment Chapter) the Urban Capacity Study has confirmed that there is no need to allocate greenfield sites this plan period. In addition, it is not considered that this location could attract any meaningful employment use to the area; it is not accepted that the area is well served with facilities and it is distant from the city centre and other main employment locations and likely therefore to promote car use.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
125	H.1		2	Allocations for Mixed Use Development Including Housing - Omission of land at Winneycroft Farm.	The previous Local Plan Inspector confirmed that the western part of the site could be developed and this could add to the choice of locations for house buyers. PPG3 identifies urban extensions as the highest priority where greenfield land release is required. Winneycroft Farm is well located in respect of facilities at Matson and has easy bus access to the higher order facilities in the city centre and employment. This part of the city would benefit from additional employment to achieve a closer relationship between homes and jobs, and the site could include an element of employment land. A comprehensive strategy for the site could identify land to be kept permanently open to meet landscape and public open space objectives.	None given.	This site (see Plan OBJ2) is designated as part of the important Landscape Conservation Area between Robinswood Hill and the Cotswold escarpment. It is also greenfield. Notwithstanding the objection on landscape grounds (see Natural Environment Chapter) the Urban Capacity Study has confirmed that there is no need to allocate greenfield sites this plan period. In addition, it is not considered that this location could attract any meaningful employment use to the area; it is not accepted that the area is well served with facilities and it is distant from the city centre and other main employment locations and likely therefore to promote car use.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
229	H.1		2	Allocations for Mixed Use Including Housing - Omission of land at Winneycroft Farm.	The previous Local Plan Inspector confirmed that the western part of the site could be developed and this could add to the choice of locations for house buyers. PPG3 identifies urban extensions as the highest priority where greenfield land release is required. Winneycroft Farm is well located in respect of facilities at Matson and has easy bus access to the higher order facilities in the city centre and employment. This part of the city would benefit from additional employment to achieve a closer relationship between homes and jobs, and the site could include an element of employment land. A comprehensive strategy for the site could identify land to be kept permanently open to meet landscape and public open space objectives.	None given.	This site (see Plan OBJ2) is designated as part of the important Landscape Conservation Area between Robinswood Hill and the Cotswold escarpment. It is also greenfield. Notwithstanding the objection on landscape grounds (see Natural Environment Chapter) the Urban Capacity Study has confirmed that there is no need to allocate greenfield sites this plan period. In addition, it is not considered that this location could attract any meaningful employment use to the area; it is not accepted that the area is well served with facilities and it is distant from the city centre and other main employment locations and likely therefore to promote car use.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
230	H.1		2	Allocations for Mixed Use Including Housing - Omission of land at Winneycroft Farm.	The previous Local Plan Inspector confirmed that the western part of the site could be developed and this could add to the choice of locations for house buyers. PPG3 identifies urban extensions as the highest priority where greenfield land release is required. Winneycroft Farm is well located in respect of facilities at Matson and has easy bus access to the higher order facilities in the city centre and employment. This part of the city would benefit from additional employment to achieve a closer relationship between homes and jobs, and the site could include an element of employment land. A comprehensive strategy for the site could identify land to be kept permanently open to meet landscape and public open space objectives.	None given.	This site (see Plan OBJ2) is designated as part of the important Landscape Conservation Area between Robinswood Hill and the Cotswold escarpment. It is also greenfield. Notwithstanding the objection on landscape grounds (see Natural Environment Chapter) the Urban Capacity Study has confirmed that there is no need to allocate greenfield sites this plan period. In addition, it is not considered that this location could attract any meaningful employment use to the area; it is not accepted that the area is well served with facilities and it is distant from the city centre and other main employment locations and likely therefore to promote car use.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
208	H.1		2	Allocations for Mixed Use Including Housing - Non Allocation of land east of Waterwells Farm.	Given the existing/proposed developments at Waterwells Farm, Raf Quedgeley and Hunts Grove, this area is a logical and comprehensive addition to those areas. The land has no recognised environmental constraints and, apart from being greenfield, there is no sound planning reason for not extending development up to the railway line which provides a clear physical boundary. The land has the same locational advantages as adjacent sites and would complement them if developed for a mixed use of housing and employment. The loss of a small amount of greenfield is not significant given the advantages of development.	Allocate the site for mixed use development.	This area is now considered to be needed for employment and is a good opportunity for high density employment use adjacent to a new station (see Employment and Travel Chapters). The area, which is adjacent to other employment land and will be remote from the local centre in the RAF Quedgeley development, is not considered appropriate for housing.	Allocate but only for employment and railway station (see Employment and Travel Chapters).

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
218	H.1		2	Allocations for Mixed Use Including Housing - Non Allocation of land east of Waterwells Farm.	Given the existing/proposed developments at Waterwells Farm, Raf Quedgeley and Hunts Grove, this area is a logical and comprehensive addition to those areas. The land has no recognised environmental constraints and, apart from being greenfield, there is no sound planning reason for not extending development up to the railway line which provides a clear physical boundary. The land has the same locational advantages as adjacent sites and would complement them if developed for a mixed use of housing and employment. The loss of a small amount of greenfield is not significant given the advantages of development.	Allocate the site for mixed use development.	This area is now considered to be needed for employment and is a good opportunity for high density employment use adjacent to a new station (see Employment and Travel Chapters). The area, which is adjacent to other employment land and will be remote from the local centre in the RAF Quedgeley development, is not considered appropriate for housing.	Allocate but only for employment and railway station (see Employment and Travel Chapters)

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	H.2		1	Allocations for Housing Development	This policy is not concise and they conflict with the intentions of PPG12 to avoid lengthy, over-detailed Plans. The identification of specific planning obligations prejudices negotiation of planning agreements contrary to Government advice in Circular 1/97.	Delete the policy and either set out in the supporting text or publish as Supplementary Planning Guidance.	Disagree. The Policy is not over-detailed and only includes essential wording to explain how the policy will be applied in making development control decisions. It would be contrary to advice in PPG 12 to defer these items to Supplementary Planning Guidance. The level of contributions on many of the site specific obligations is open to negotiation at the planning application stage.	No change.
164	H.2		1	Allocations for Housing Development	In view of GOSW's objections to the affordable housing threshold (Policy H.15) it should be made clear that affordable housing will not be sought on Sites 1,2,7, and 11.	Add text to set out those sites which will not provide affordable housing.	Agree, but only those sites which fall below the new threshold included in Policy H.15 should be mentioned.	Add appropriate text to Paragraph 6.17.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	H.2		1	Allocations for Housing Development	Insufficient evidence is provided to demonstrate that all of these sites are capable of being developed within the plan period. PPG3 advises that in allocating sites and following the search sequence the potential and suitability of sites should be assessed against specific criteria. This is important given the constraints on some sites.	Site assessments should be included in the supporting text or set out in the Urban Capacity Study. Where a site fails any of the PPG3 tests and is unlikely to come forward it should be deleted from the policy and replaced with a site that is deliverable.	Further work has been undertaken to up-date the Urban Capacity Study including work by Chesterton on viability and availability. The allocations in Policies H.1 and H.2 have been amended taking account of likely deliverability (see information in new Appendix 6), and a greater level of potential over-supply has been included to give considerable flexibility.	No further change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
13	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	New housing would not fit with the historic architecture of the buildings around the square and would ruin its character of the square; housing should not be built on a car park that people use; no trees should be removed.	Keep the square as it is, but plant more trees and flowers.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

conservation and
regeneration strategy. The
policy obligations should
therefore be changed to
enable an interim scheme to
be implemented providing an
enhanced Square,with

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
CHAPTER 6			T = TYPE	1 - Objection 2 - Omission 3 - Support			residents and public parking.	Page 59 of 237

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
29	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	New housing would spoil the square and would not fit in with the Victorian buildings around the square. There must be more suitable sites for new houses.	Remove allocation for housing.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design.</p> <p>Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types.</p> <p>However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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CHAPTER 6			T = TYPE	1 - Objection 2 - Omission 3 - Support			residents and public parking.	Page 61 of 237

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
45	H.2		1	Allocations for Housing Development Site1 Part of St. Michael's Square	Parking that is local to the college is essential.	Remove allocation	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

conservation and
regeneration strategy. The
policy obligations should
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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
CHAPTER 6			T = TYPE	1 - Objection 2 - Omission 3 - Support			residents and public parking.	Page 63 of 237

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
62	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square.	Car park is needed to serve existing businesses in the Square. The proposal will bring down and outs to the area. Do something with the derelict houses in the City instead. Retain the trees not replace them with building.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
63	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square.	Unnecessary development that will cause loss of trees and further destroy part of the environment of the city. The proposal will add to the degeneration of the area which has been caused by the Council and one or two private landlords. There are other sites that could be used for housing such as Linden School and Ribston Hall on Spa Road, and empty homes should be filled before any further building starts.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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76	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	<p>The car park provides a valuable facility for the local business community and the multi-occupancy houses, and safe parking for females in the city centre during the evening. Loss of parking may encourage shoppers to go to Bristol or Cheltenham. A decision on this area should be deferred pending the conclusion of any Gloscat re-location. A more limited development could take place and the car park be retained.</p>	Amend the allocation to retain the car park.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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78	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	The housing would be an eyesore creating more pressure on businesses to re-locate away from this area. There is no need for the housing, nor for the loss of the car park.	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design.</p> <p>Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types.</p> <p>However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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85	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	Proposal will not safeguard the heritage of the Square. If flats are built there will be transient tenants. The houses and associated parking will mean loss of trees. The Square is already hemmed in by the new development to the north. The development will block off the Square. The Square should be enhanced and the view in from Brunswick Road retained, as it is to Brunswick Square. Empty houses should be filled before new ones are built.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
87	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	No reason given.	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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88	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	<p>Housing on the Brunswick Road frontage will detract from the area. The scheme will cause loss of trees and the new garden will be hidden from Brunswick Road. The loss of car parking will cause congestion in other areas, and cause shoppers and tourists to go elsewhere.</p>	Remove the allocation. Retain the car parking but enhance with more trees and shrubs.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
108	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	<p>The housing would damage the areas architectural significance and totally enclose and cut off the open space from the city. The open space remaining would be fundamentally damaged by its reduction in size, the reduction in light and the overlooking from the housing. The open space and housing are contradictory proposals. Many trees will be lost. Parking will be inadequate for residents and disastrous for businesses. City centre Squares always have an open side e.g.. Brunswick Square. Inadequate consultation has been undertaken with residents and businesses.</p>	Remove the allocation in its current form.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
109	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	Not explained.	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
110	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	The site should be all open space as was proposed in the Parks Strategy. (Petition attached, 168 signatures, which objects to the closure of the car park and the building of houses on part of the site)	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design.</p> <p>Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types.</p> <p>However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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111	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	<p>The Square needs renovation; particularly substantial planting to screen the car park.</p> <p>However, the housing will obscure the area from Brunswick Road defeating any plan to re-create atmosphere and appearance, and encouraging more anti-social behaviour.</p> <p>The car parking would have to be replaced elsewhere or less shoppers and tourists will come to the centre and businesses will close. The housing is unnecessary when many properties stand empty.</p>	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design.</p> <p>Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types.</p> <p>However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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130	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square	The proposed allocation is inappropriate and will not encourage regeneration. The amenity value of the Square will be damaged by building on the frontage. The council's ability to manage another green space must be questioned. The development is not necessary to fulfil the housing requirement.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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172	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	Filling in the Brunswick Road frontage will make the Square less spacious and somewhat out of proportion to the architect's original plan. It will also make the roadway around the Square less open to view which will increase the incidence of street crime.	Remove the allocation and make into a green space similar to Brunswick Square.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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175	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	Support the removal of the car park but object to enclosing the west side of the square with housing. Brunswick Square is the perfect model to copy.	Remove the housing allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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178	H.2		1	Allocations for Housing Development Site1 Part of St. Michael's Square	The whole of the site should be open space as set out in the Council's Public Open Space Strategy.	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design.</p> <p>Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types.</p> <p>However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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180	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	The housing would have a deleterious effect on the area and would break up the openness of the Square which extends in from Brunswick Road. Residents on the north side of the Square have already lost open space to the rear.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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182	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	The whole of the Square should be returned to Open Space as set out in the Council's Public Open Space Strategy.	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design.</p> <p>Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types.</p> <p>However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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183	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	The area is already densely developed with mixed housing and car parking is a problem. It would be unreasonable to use land that could improve the area for the inhabitants by providing enhanced gardens. There is little open space in the southern inner city area and what there is should be maintained and used to the full.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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184	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	There is hardly any green space open to the public in the heart of the city, and the whole of this space should be allocated as public open space. Residents parking should be on-road. This Square should be like Brunswick Square and have no building fronting Brunswick Road.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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186	H.2		1	Allocations for Housing Development Site 1 Part of St Michael's Square facing Brunswick Road.	Removing the car park will reduce city centre parking and increase density of parking in the surrounding area, causing more disruption for residents and discouraging people from coming into town.	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

conservation and
regeneration strategy. The
policy obligations should
therefore be changed to
enable an interim scheme to
be implemented providing an
enhanced Square,with

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
CHAPTER 6			T = TYPE	1 - Objection	2 - Omission	3 - Support	residents and public parking.	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
224	H.2		1	Allocations for Housing Development Site 1 Part of St. Michael's Square	Objects to the housing and considers the whole Square should be made an open space as suggested in the Council's Open Space Strategy.	Remove the housing allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design.</p> <p>Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types.</p> <p>However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
227	H.2	Site 1	1	Allocations for Housing Development Site 1 Part of St. Michael's Square for Housing	Loss of car parking in the Square would severely effect business by restricting access for clients, as well as having a detrimental effect on residents, shoppers and college users. It will exacerbate existing problems and this may lead to the current unrestricted access to the parking at St. Michaels Court at evenings and weekends being withdrawn. Housing on the frontage will add to parking problems. These proposals will lead to relocations out of town and add to the decline of the centre. A public open space in the centre will not work practically unless properly patrolled, and there is a questionmark over whether its needed given the proximity to the Park.	Remove the allocation.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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CHAPTER 6			T = TYPE	1 - Objection 2 - Omission 3 - Support			residents and public parking.	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
234	H.2	6.16	1	Allocations for Housing Development. Site 1 Part of St. Michael's Square	The obligation to re-instate the Square to open space and residents parking does not deal with the need for nearby parking to be available for patients visiting the surgery, and for other essential visitors to businesses etc.	Ensure specific car parking is made available for patients attending the surgery.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the	Amend the obligations attached to Policy H.2 Site 1 to enable an interim scheme to be implemented.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
235	H.2		1	Allocations for Housing Development. Site 1 Part of St. Michael's Square	Leave the Square as it is. Gardens would bring in drunks and troublemakers.	Remove the allocation.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the Square, either architecturally or socially, subject to a satisfactory design. Alongside the Townscape Heritage Initiative the housing, which can help fund environmental improvements to the Square, is intended to give the area an up-lift. While many support changing the Square to public open space, it is considered that there is a need to maintain public car parking for businesses in this area in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square as part of the</p>	No change to the housing allocation but amend the site obligations accordingly.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
1	H.2		1	Allocations for Housing Development Site 3 Thomas Rich's Car Park Hampden Way	None given	A central quality hotel rather than housing on the site.	residents and public parking. This is not a prominent enough location to be attractive to a high quality hotel, and other proposals exist on Westgate and are emerging in the Western Waterfront area to meet likely demand.	No change.
37	H.2		1	Allocations for Housing Development Site 3 Thomas' Rich's Car Park, Hampden Way	Housing development on the site would not bring enough profit to the owners.	Remove allocation.	The allocation has attracted interest from a developer which it is known to be being considered by the owner. The redevelopment could become profitable in the Plan period.	No change.
66	H.2		1	Allocations for Housing Development Site 3 Thomas Rich's Car Park, Hampden Way	Should probably be an hotel site of maximum height with car parking underground.	Re-allocate for a maximum height building for multiple purposes capable of adaptation for 1000 year usage.	This is not a prominent enough location to be attractive to a high quality hotel, and other proposals exist on Westgate and are emerging in the Western Waterfront area to meet likely demand.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	H.2		1	Allocations for Housing Development Site 4 Land at the Hospital, Great Western Road	Adjacent to the rail station, this should be developed for car parking at lower levels with dwellings above which should be adaptable to workplaces in the future. Should be developed to similar height as the existing hospital and could provide more than 80 dwellings.	Amend allocation.	Disagree. Do not consider housing in tower blocks to be appropriate. The density proposed is appropriate for this site. Future adaptability is an issue for the Building Regulations and is not currently required.	No change.
69	H.2		1	Allocations for Housing Development Site 4 Land at the Hospital Great Western Road	Object due to the extra traffic which will add to existing problems as the road is not wide enough. The site will be too close to the hospital and local schools.	Remove the allocation.	This is a good location for housing as residents should be able to access most facilities without using a car. Proximity to the hospital and to local schools is not considered to be a problem.	No change.
154	H.2		3	Allocations for Housing Development Site 4 Land at the Hospital, Great Western Road	Following completion of the Hospital redevelopment there will be surplus land, and its sale for housing is a major factor underpinning the capital programme.		Comment noted.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	H.2		1	Allocations for Housing Development Site 5 Former Hospital Stores, Great Western Road	This site is important location for potential future ring road.	Remove the allocation and reserve part of the land for the re-alignment of Great Western Road. Add remainder of site to the adjacent employment allocation for tower block height building with car park at base to serve the hospital.	The site is now a commitment and the buildings are under construction.	Delete the site from Policy H.2 and include in the list of commitments in Table 3.
38	H.2		3	Allocations for Housing Development Site 6 Bus Depot, London Road	Housing development would improve the environment and would mean no noise, vibrations and fumes from buses.		Support noted. Although the recent scheme for re-location has failed, the principle of replacing the depot with housing is a desirable aim.	No change.
41	H.2		3	Allocations for Housing Development Site 6 Bus Depot, London Road	Housing development would improve the quality of life; and would mean no noise, vibrations and fumes from buses.		Support noted. Although the recent scheme for re-location has failed, the principle of replacing the depot with housing is a desirable aim.	No change.
24	H.2		1	Allocations for Housing Development Site 8 Part of Oil Storage Depot, Hempsted Lane	Housing on this site would result in an unpleasant environment.	Remove housing allocation.	Disagree. The housing offers the opportunity to remove an existing bad neighbour use and improve the appearance of the site.	No change.
66	H.2		1	Allocations for Housing Development Site 8 Part of Oil Storage Depot, Hempsted Lane	This site is on the line of a potential link road to a new by-pass to the west of Hempsted. Only temporary use of the site for employment purposes should be allowed until this road scheme is implemented.	Remove the allocation and reserve for future road scheme.	The Local Plan can only take into account the road infrastructure planned through the current Structure Plan.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
116	H.2		1	Allocations for Housing Development Site 8 Part of Oil Storage Depot, Hempsted Lane	Proposal is unclear as most of the site is a Landscape Conservation Area. Any development in the LCA would be objected to. Any housing must not intrude onto the skyline of the escarpment as a feature of the view from the Severn Vale. Total objection might be modified if area for development is properly defined.	Remove allocation.	The area proposed for development is only that part adjacent to Hempsted Lane, but the allocation includes the whole site to enable environmental improvements across the site to be sought. The area is properly delineated on the Proposals Map but it would be beneficial to re-word the site title to be clearer.	Amend the description of Site 8 in Policy H.2.

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Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
147	H.2		1	Allocations for Housing Development Site 8 Part of Oil Storage Depot, Hempsted Lane	More land is needed due to the likelihood that some sites will not be fully implemented. Failure to meet strategic housing requirements will affect the property market and the ability to accommodate the needs of all sectors of the population. This site is brownfield and meets the locational requirements in PPG3. Only part of the site is allocated but a much larger site is available to help meet needs and this would deliver environmental and visual improvements. The future re-use of the site depends on remediation of contamination and this will be expensive (and is being investigated). For a developer to take on this risk sufficient value needs to be extracted from the site. The current allocation of 0.9Ha will not pay for the remediation works and, together with the other obligations the Plan is seeking, may prevent the site's development.	Allocate a larger proportion of the site for development. Add text to state "Site specific obligations will be sought by the Council where they are related and considered reasonable to the scale and nature of the development proposed. The application of site specific obligations will be considered in the context of other developer contributions".	Only part of this site should be developed as the remainder has landscape value. There is sufficient land allocated within the Plan to meet requirements (see other Housing amendments). Despite requests the objector has not provided costs of remediating contamination. Contributions from the site will be considered on site and market conditions and would not prevent site development.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
166	H.2		1	Allocations for Housing Development Site 8 Part of Oil Storage Depot, Hempsted Lane	This site conflicts with the identification of land adjacent to Sudmeadow in the Waste Local Plan (RD14) which could see the site used for materials recovery, recycling and anaerobic digestion. It would be inappropriate to permit housing development in close proximity to such a site.	Remove the allocation.	The site referred to in the Waste Local Plan is part of the Landscape Conservation Area and is being contested by the City Council. In any event the part of this site which is proposed for development is as far away from this field as existing housing.	No change.
25	H.2		3	Allocations for Housing Development Site 9 Land at Tuffley Lane	Housing on this site would result in a quieter, less industrial area.		Support noted.	No change.
4	H.2		1	Allocation for Housing Development Site 10 Grange Road Infants School	Object to number of houses proposed.	Maximum number should be 20.	Disagree. It is national policy to increase densities and make best use of land within towns. Densities of less than 30 per hectare are to be avoided. The indicative capacity for this site is only just above this minimum and is considered appropriate.	No change.
11	H.2		1	Allocations for Housing Development Site 9 Land at Tuffley Lane	Extra traffic from these houses would be to the detriment of all local residents living in the area.	Do not allocate the site.	The level of extra traffic from these houses will not cause a serious problem and the site is well placed for future residents to use buses.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
11	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	Extra traffic from these houses would be to the detriment of all local residents living in the area.	Do not allocate the site.	The level of extra traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. The site is well placed for future residents to use buses and access local facilities by foot.	No change.
15	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	The area is already built up and there is no need for more housing.	Remove allocation for housing.	The need for more housing in Gloucester was determined through the Structure Plan. Previously used sites within the urban area are a priority for new development under national policy to protect the countryside from development.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
17	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	There is no need for more housing on this site; traffic congestion is bad enough; the school should be kept.	Remove allocation for housing.	The County Education Authority advise that the infant school is to be amalgamated with the junior school and will therefore become surplus. The need for more housing in Gloucester was determined through the Structure Plan. Previously used sites within the urban area are a priority for new development under national policy to protect the countryside from development. The level of extra traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. The site is well placed for future residents to use buses and access local facilities by foot.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
21	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	The number of houses proposed is too high. It will result in traffic problems. The site is planted with lovely trees and has a play area.	Remove allocation for housing. Keep the land as green space.	The level of housing is only an indication but national policy encourages best use to be made of sites to safeguard green fields. Retaining the trees and providing for children on the site are matters of detail that would be dealt with at the planning application stage. The level of extra traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. The site is well placed for future residents to use buses and access local facilities by foot.	No change.
70	H.2	6.15	1	Allocations for Housing Development Site 10 Grange Road Infants School	Increase in traffic will cause inconvenience and more pollution and noise. There may be a possible sewerage problem.	Remove the allocation.	The level of extra traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. The site is well placed for future residents to use buses and access local facilities by foot. Any localised sewerage problem would need to be resolved in the detail of the development.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
114	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	The site is part of a wildlife corridor linking Robinswood Hill and the Canal, and the proposal is contrary to the Council's commitment to the Biodiversity Action Plan, and specifically the Urban Habitat Action Plan. The site is suspected to contain a bat roost, and great crested newts have been seen in the school pond. The development for housing would be contrary to the Guidance on protecting open space that has potential value to the community. The building has heritage value having been constructed from left-over materials from the war.	Remove the allocation.	Disagree. There is not a well-defined wildlife corridor and loss of this site is off-set by the work that the Council has undertaken through its commitment to Green-Up Gloucester. The potential existence of protected species on the site is an issue that will be considered when a planning application is made. The site cannot be justified for retention as open space given the existence of Holmleigh Park nearby. The heritage value of the building is limited and does not merit its retention.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
118	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	This school is an architectural oddity of some significance. It has a degree of heritage interest and it is popular in local opinion. Policy BE.7 of the Plan refers to local distinctiveness as a key factor in calling for building preservation. This building is part of Gloucester's diverse heritage and in this area is the most distinct building and a local landmark. The building is re-usable, perhaps for employment. Guidance on open space suggests that the Council should be seeking to maintain the amenity of the site.	None given.	The site cannot be justified for retention as open space given the existence of Holmleigh Park nearby. The heritage value of the building is limited and does not merit its retention. It is not a significant landmark building. While the building may be physically convertible to employment use it is unlikely that there would be a demand for it.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
142	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	The site should not be used for housing because the building has historic interest and it is the only open space on Grange Road between the railway line and Cole Avenue. Holmleigh Estate is large enough already and the housing is not needed with the major development planned at RAF Quedgeley. The housing would cause too much traffic on Grange Road and access from Holmleigh Road would be by the shops where there is a bad bend and congestion from parked cars.	To stop the sale of this site.	The site cannot be justified for retention as open space given the existence of Holmleigh Park nearby. The heritage value of the building is limited and does not merit its retention. The development of RAF Quedgeley involves the loss of green fields to development and is less of a priority in national guidance to re-using sites within the urban area. The level of extra Traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. The site is well placed for future residents to use buses and access local facilities by foot. Precise details of access arrangements and any parking restrictions that may be needed are a matter of detail to be considered when a planning application is made.	No change.
163	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	(As landowner) The scale of the development does not warrant phasing with transportation.	Delete site specific obligation.	Agree.	Delete phasing obligation from Policy H.1 Site 10.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
179	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	Concerned that the housing would cause extra traffic, noise, and loss of outlook including light from streetlights, and devalue adjoining property.	Remove the allocation.	The level of extra traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. In principle the site's development will not unreasonably affect the amenities of neighbouring properties, and issues of siting and design are matters for the planning application stage.	No change.
185	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	None given.	Remove the allocation.	The allocation is the reasonable re-use of a previously developed site.	No change.
194	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	New housing would be out of character with the area and would add to traffic on Grange Road contrary to the Council's traffic policy. The school is needed in the local area..	If building is necessary it should be limited to single storey old peoples homes.	The school is to be amalgamated with the junior school and will not be lost to the community. The level of extra traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. The site is well placed for future residents to use buses and access local facilities by foot. The site is in an area of houses and there is no need for the development to be restricted to single storey.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
195	H.2		1	Allocations for Housing Development Site 10 Grange Road Infants School	More houses will add to traffic congestion problems. The land should be reserved for a doctors surgery.	Remove the allocation.	The level of extra traffic from these houses will not cause a serious problem, and in the immediate locality will be reduced through the relocation of the school. The site is well placed for future residents to use buses and access local facilities by foot. A proposal for a doctor's surgery was recently granted planning permission on Tuffley Lane to meet the demand in this area.	No change.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
5	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	Do not want housing on the site	Turn the site into a public park	<p>Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.</p>	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
18	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	There is no need for more housing; this is the last space available to provide a green play area.	Remove allocation for housing.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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19	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	There is no need for more housing; there is no place for children to play.	Remove allocation for housing.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
22	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	There is no need for housing on this site; it should be left as a green area.	Remove allocation for housing.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
23	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	There is no need for housing on this site, particularly as RAF Quedgeley will be used for housing; traffic from houses on Woolstrop Cottage could cause accidents to children crossing between two local schools; there are not enough park areas in Quedgeley.	Remove allocation for housing.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
28	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	The site offers an opportunity for the sadly lacking public open space in Quedgeley. Open space could enhance the Scheduled Ancient Monument.	Remove allocation for housing.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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30	H.2		1	Allocations for Housing Development Site 11 Woolstrop Cottage	No need for more houses in Quedgeley. Site would be better used as a park.	Remove allocation for housing. Keep the land as green space for all the family to enjoy, not just teenagers.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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39	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	Quedgeley is overcrowded and there is a lack of play areas for children.	The site should be bought and used by local children.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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40	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	There are too many houses and not enough play areas in Quedgeley; the new houses would cause an increase in traffic accidents, especially to young children.	The site should be used for either wildlife or as a children's play area; the moat and trees should be used for wildlife.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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44	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage	Woolstrop Cottage should be an area of public open space.	Remove allocation and ensure the site is made an area of public open space.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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55	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage.	The proposal would leave inadequate open space which, along with the Moat, would be hidden from public view and subject to vandalism. The housing would add to traffic problems on School Lane so endangering children. The setting of the monument would not be preserved contrary to Structure Plan policy.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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56	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage.	The site is a haven for wildlife and could provide an open space along School Lane which is lacking. The site entrance is dangerous and School Lane is a main thoroughfare for school children. The proposed houses would cause a traffic hazard.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
57	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage.	Quedgeley lacks areas of green space, and this has the added interest of an historic monument. The housing allocation jeopardises the possible rejuvenation of the monument.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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58	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage.	<p>The allocation will adversely affect the peaceful setting of the Moat and the wildlife value of the site.</p> <p>Quedgeley needs more open space. The small area of space between the houses and the Moat will be out of view and encourage mischief. The access would be dangerous, particularly to school children.</p>	Remove the allocation and arrange for its purchase for open space using Parish Council taxes..	<p>Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option.</p> <p>However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.</p>	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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59	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage.	Quedgeley has insufficient public open space and this site should be purchased for this purpose. The proposal would only provide the minimum of 1/2 an acre of open space which would be isolated and suffer from anti- social activities. The site entrance is onto an important route to local schools which is also a bus route, and adjacent to a crossing point. Traffic from the site would exacerbate existing peak time problems and would cause danger to children. The whole site should be protected to enhance the setting of the ancient monument in accordance with Structure Plan policy.	Delete the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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73	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage	Quedgeley is poorly served with public open space. This site could provide a community garden and should be retained to safeguard the habitat for wildlife. The proposal to build at the front would spoil the setting and public awareness of the moat, and the central area would be an area for vandalism. The houses would add to traffic congestion on School Lane causing danger to children walking to and from school.	Remove the allocation and retain all the site as open space, and for nature conservation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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74	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage	This area was designated as open space ten years ago and the need still exists. It is also a haven for wildlife. The site has poor access next to a traffic calming measure. The extra traffic from the houses would pose a significant risk to road safety, particularly for school children. The houses would not preserve the setting of the ancient monument as is required by Structure Plan policy.	Remove the allocation and retain the area as open space.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
98	H.2		1	Allocations for Housing Development Site 11 Woolstrop Cottage	There is enough houses and a lack of open space in Quedgeley. The site should be made a park. The housing would bring more pollution and add to the traffic problems on School Lane.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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99	H.2		1	Allocations for Housing Development Site 11 Woolstrop Cottage	There is very little land left in Quedgeley that has not been built on. This site should be reserved for wildlife and used as a park. The houses would only cause more traffic congestion and the access onto School Lane would be dangerous, particularly for school children.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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102	H.2		1	Allocations for Housing Development Site 11 Woolstrop Cottage	There is little public open space in Quedgeley. This area should be kept as a park to enhance the setting of the Moat and protect the wildlife. The open space that would result from the plan proposal would add to criminal activity. The extra traffic at a bottleneck would cause danger to schoolchildren.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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103	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage.	There is a lack of open space in Quedgeley which gives rise to nuisance and vandalism. The proposed housing is contrary to policies in the Local Plan which aim to safeguard the setting of historic buildings and ancient monuments. The existing Additional Areas Plan identifies the site for open space and for enhancing the setting of the Moat, and the Council's withdrawal from this position is not justified, particularly in the light of previous appeal decisions on the site..	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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104	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage	The houses would add to the traffic and cause danger to schoolchildren. Question whether more houses are needed in this built up area.	Remove the Allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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105	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage	Quedgeley has little open space, less than 2 acres per thousand population compared to the 6 acre standard. Questions where resident and visitor parking would be provided. The extra traffic from the proposed housing and its access point to School Lane would cause danger in a school safety zone.	Remove the allocation and create an open space/conservation area.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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107	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage	The area has little public open space, only 2 acres rather than the standard 6 acres per thousand people. The access is into a safer route to school area for three schools and will create more traffic problems. The proposed housing would leave a small open space not visible from any road where crime and mischief could be concealed.	Remove the allocation and use the site as public open space.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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134	H.2	6.13	1	Allocations for Housing Development Site 11 Woolstrop Cottage	Poor access and traffic conditions make the site suitable for only one or two houses. Central Quedgeley has too little open space. The site could be a much needed park funded by new development of major sites.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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146	H.2		1	Allocations for Housing Development Site 11 Woolstrop Cottage	Loss of open space. Danger from traffic on School Lane. Site not big enough for 15 dwellings.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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163	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage.	The scheduled ancient monument should be excluded from the allocation together with sufficient land to protect its setting and to facilitate access for management and for the general public.	Amend the allocation (no precise boundary suggested)	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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170	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	The higher densities advocated by PPG3 suggest this site could take a greater number of dwellings which might be required to help fund the site obligations.	Increase the allocation to 20 dwellings.	These comments confirm that the amount of housing needed to fund the site obligations has yet to be firmed up. There is a clear need for additional public open space in this locality, and residents would prefer making the whole of this site into a public open space. It is accepted that achieving public open space is only likely if part of the site is developed. However, every effort needs to be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development of housing at the front of the site. A high density may be appropriate if this brings more land into open space use but this is a matter of detail when an enabling development is proposed.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
176	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	There is a lack of Public Open Space in Quedgeley and the site should be brought into public ownership to provide open space and protect the ancient monument. The housing would affect safety of school children on School Lane.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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191	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	Housing on the site would conflict with Policy ST.3 Safeguarding Greenfield Land, Policy B.3 Sites of Nature Conservation Interest, and Policy BE.35 Scheduled Ancient Monument; and would not satisfy all the criteria in Policy B.27. It would also conflict with the draft Public Open Space Strategy: the amount of open space in Quedgeley is seriously short of the adopted standard.	Delete Site 11, site of Woolstrop Cottage, from Policy H.2	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

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221	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	Open space is lacking in the area. The housing would add to traffic congestion on School Lane and cause danger to school children.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
222	H.2		1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	School Lane is already busy especially at school times and an extra entrance would add to the difficulties. There is not enough open space in the area.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
223	H.2	6.13	1	Allocations for Housing Development Site 11 Site of Woolstrop Cottage	There is not enough open space in Quedgeley, and too many houses already and not enough amenities. The houses would create more traffic.	Remove the allocation and provide an open area with seats.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
231	H.2		1	Allocations for Housing Development. Site 11 Site of Woolstrop Cottage	There is not enough open space in Quedgeley and too many houses. This area could provide a large childrens play area for all ages.	Remove the allocation.	Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
236	H.2		1	Allocations for Housing Development. Site 11 Site of Woolstrop Cottage	The site has nature conservation value which is enhanced due to its urban location.	Remove the allocation.	<p>Although there is clear resident support for making the whole of this site into a public open space, there is no evidence that this can be achieved, and the option of achieving public open space on part of the site funded from a development for housing at the front is still the only viable option. However, every effort should be made to maximise the amount of Public Open Space, and the amount of land needed for development is still subject to debate. It is therefore considered that the specific allocation for housing should be deleted and the Public Open Space allocation restored but with reference in the text of Chapter 10 to a potential enabling development. The site is capable of accommodating some residential development without damaging the setting of the Moat, causing highway danger or adversely affecting the nature conservation interest of the site.</p>	Delete Site 11 Woolstrop Cottage from Policy H.2, allocate for public open space in Policy OS.7, and amend the text at Paragraph 10.25 to refer to potential enabling development.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	H.2		1	Allocations for Housing Development Sites 1,2, 6, 7, 9,10, and 11	Ensure development in terraces of six storeys to enable re-location of allocations from elsewhere in advance of the re-building of the Gloucester conurbation to a minimum of 6 storeys commencing at the beginning of the next century, to save Gloucester's heritage and the surrounding countryside.	Masterplan the re-building of the Gloucester conurbation.	While some multi-storey development for housing may be appropriate within the central area and the Western Waterfront in particular, the development of all sites to six-storeys would not meet the range of housing needed in the city. The Plan seeks to strike a balance between raising densities and providing a high quality environment appropriate to the character of different locations in the city.	No change.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
43	H.2		1	Allocations for Housing Development - Non-allocation of land at Tuffley Crescent.	Inadequate housing land has been allocated given constraints. This site has limited potential for employment and could provide 4ha of housing early in the plan period. The site is in a sustainable location within the urban area and its development for housing would significantly benefit the adjacent housing area.	Allocate land at Van Moppes, Tuffley Crescent, for housing.	Agree in part. This site adjoins existing residential properties but also adjoins potential sources of nuisance. The site has potential to link with adjoining vacant industrial premises on Bristol Road to provide a comprehensive mixed use redevelopment to include some replacement employment land. A comprehensive plan is needed to ensure a satisfactory environment by removing all potential bad neighbour uses, to optimise the arrangement of uses in the area and share the costs of access improvements. These should include the removal of the old railway bridge.	Allocate this site in Policy H.1 as part of a mixed use scheme involving neighbouring sites.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
132	H.2		2	Allocations for Housing Development - non identification of land on Bristol Road.	New allocation of land on Bristol Road.	Allocate Land at Wellman Graham, Bristol Road for 150 houses.	Agree in part. This site is a potential source of nuisance as are vacant premises adjoining. There is potential for a comprehensive mixed use redevelopment to include some replacement employment land and housing. A comprehensive plan is needed to ensure a satisfactory environment by removing all potential bad neighbour uses, to optimise the arrangement of uses in the area and share the costs of access improvements. These should include the removal of the old railway bridge.	Allocate this site in Policy H.1 as part of a mixed use scheme involving neighbouring sites.
170	H.2		2	Allocations for Housing Development - New site on land between Bristol Road, Tuffley Avenue and Tuffley Crescent.	The factories in this area are at the end of their useful life and should be considered as a brownfield residential allocation.	Allocate for residential use.	Agree in part. The vacant industrial premises adjacent to the old railway bridge are however suitable for a mixed use scheme including some replacement employment land.	Allocate in Policy H.1 the former Wellman Graham site, the Contract Chemicals site, and the Saint Gobaine site for a comprehensive mixed use development of housing and employment.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
124	H.2		2	Allocations for Housing - Non Identification of TA and Adjacent Land, Eastern Avenue	The site is previously developed and in a sustainable location within the urban area near to mixed use and employment development. It is suitable for housing.	Add the site to Policy H.2.	Agree that the site, provided it is developed comprehensively with adjoining land at the corner of Walls Roundabout, offers the opportunity for a landmark development at this prominent corner site. However, with the removal of the British Energy redevelopment from the Plan there is now a shortage of opportunities for employment development in this part of the City. It is considered that this location alongside a very busy junction is more suited to employment use than housing.	Allocate all of the land and dwellings on the south-east corner of Walls Roundabout for employment development in Policy E.2.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
144	H.2		2	Allocations for Housing - Non allocation of land at Brookside.	Insufficient land has been allocated given recent completion rates. A 10% allowance for non completion of allocations has not been included, unlike the 1996 Local Plan. The approach to allocation in the Plan is not in accordance with the advice in PPG3 which is not aimed at sterilising appropriate greenfield development. Some of the brownfield allocations are held as investment properties and the physical and environmental constraints means likelihood of implementation is low. Aiming for 80% of new housing from brownfield is unrealistic. Some of the sites in Policy H2 have to be phased with infrastructure which suggests they do not score well against the PPG3 criteria for site selection. The Urban Capacity Study categorises land at Brookside as sequentially preferable to the RAF Quedgeley greenfield land, and allocating out of sequence cannot be	Allocate land at Brookside.	This site (see Plan OBJ4) is greenfield and lies within the urban area. The housing strategy has been revised following further work on urban capacity to investigate further the deliverability of brownfield sites. This work has confirmed that with the exception of part of RAF Quedgeley there is no need to allocate any greenfield sites for development in this plan period. It is considered that it is justified to promote the greenfields at RAF Quedgeley to first priority amongst greenfield sites given its identification in the Structure Plan and the need to create a properly planned development on the whole site.	No change.

justified on the basis of
the need for
comprehensive
development. Brookside
was allocated in the 1996
Plan, is appropriate for
residential development,

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					and is well related to existing communities and infrastructure. There are no longer any ownership constraints to the site being developed. The release of the site could be subject to a separate policy.			

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
155	H.2		2	Allocations for Housing Development - New site between the A38 and the Old Bristol Road.	<p>This site was considered for the last Plan but the Dimore Brook was defined as the natural boundary to development. The context of this site has now changed dramatically with the development of Waterwells Farm. While the regeneration of the centre and priority to brownfield are supported by the Structure Plan, other sites that are available that do not cause harm and perform well against the criteria in PPG3 should be supported. This site is greenfield but has development on three sides. It is well located and accessible in relation to jobs and services and part of a well balanced area in terms of the mix of uses. It would promote reduction in travel. The site has no constraints, is readily available and would assist in providing a choice of sites. Infilling the site would be a logical development. The site has no landscape or visual merit. The site is small and would not affect the</p>	Add this 1.8ha site for 50 dwellings to the policy, and add to the Proposals Map.	<p>While the surrounding area has been changing the site (See Plan OBJ5) remains greenfield and would be an urban extension to the city. Further work on the urban capacity study confirms that this site is not needed this plan period and an allocation would therefore be contrary to national guidance.</p>	No change.

Plan Strategy and need
not be phased in relation
to RAF Quedgeley.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	H.2		2	Allocations for Housing Development - Non identification of Tuffley Farm for housing.	The sites MU.2 Western Waterfront and MU.5 RAF Quedgeley are unlikely to be delivered in the plan period. Tuffley Farm should be considered for development to meet housing requirements. It has no designations to prevent development.	Allocate land at Tuffley Farm.	This site (See Plan OBJ6) is greenfield and would be an urban extension to the city. Further work on the urban capacity study confirms that this site is not needed this plan period and an allocation would therefore be contrary to national guidance.	No change.
184	H.2		2	Allocations for Housing Development - Omission of B and Q Site, Bruton Way	This site is inappropriate for a large DIY store. It should be allocated for high density housing, maybe with small shops fronting Barton Street.	Add to the allocations in Policy H.2.	There is nothing to suggest that the owners of this site (see Plan OBJ7) will want to relinquish the current restricted retail use. If the site became redundant a redevelopment for a mix of uses including housing could be acceptable and this can be considered under policy H.4.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	H.2		2	Allocations for Housing Development Omission of Land off Windfall Way	The Plan fails to allocate a sufficient range and choice of sites for residential development during the Plan period. This site is easily and conveniently accessed by means other than the car, and there are no overriding environmental constraints precluding development.	Allocate land at the eastern end of Windfall Way for residential development.	Disagree that the Plan allocates insufficient range and choice of sites. This site (see Plan OBJ9) is a former playing field which is a greenfield site and protected by Policy SR.2 to contribute to the recreational needs of the city. (NB. A planning application for part development of housing has now been agreed by the Council subject to compensatory provision being made at Innsworth Lane).	No change.
203	H.2		2	Allocations for Housing Development Omission of Land East of Innsworth Lane	The Plan fails to allocate a sufficient range and choice of sites for residential development during the Plan period. This site is easily and conveniently accessed by means other than the car, and there are no overriding environmental constraints precluding development.	Allocate the land east of Innsworth Lane and south of the northern by-pass for residential development.	Disagree that the Plan allocates insufficient range and choice of sites. This site (see Plan OBJ8) is a greenfield site on the edge of the city which is designated as a Landscape Conservation Area for its contribution to the local character of the area. (NB. Under a recent planning application this site is proposed to be a replacement playing field for the part redevelopment for housing of the former British Rail site at Elmbridge)	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	H.2		2	Allocations for Housing Development - Non allocation of land South of Hempsted	This site offers the opportunity to create a new community at a sustainable location close to the city centre and with excellent links to surrounding areas. The key planning benefits are that it is an urban extension and sequentially better than building in the open countryside, it can contribute to and will benefit from the SWBP, it is of little environmental value and the development would have little impact, the site is well located to facilities and employment and will reduce the need to travel, and could provide a range and mix of houses. Development is achievable in the plan period.	Add the site to Policy H.2	This site (see Plan OBJ10) is greenfield and forms the south slope of the escarpment around the hill-top village of Hempsted. This is a landscape conservation area designation that was confirmed through the Local Plan Inquiry 1993 when the Inspector confirmed that housing on this site would be harmful to the distinctive setting and character of Hempsted. The site also lies within the cordon sanitaire designation for Netheridge Works where housing development is precluded. The Housing Strategy of the Plan only envisages the need for an urban extension at RAF Quedgeley which is half brownfield and identified in the Structure Plan.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
212	H.2		2	Allocations for Housing Development - Non Allocation of Land at The Wheatridge (primary school site)	The land has been allocated for a school for 20 years and the surrounding residential development has long been completed. There is no need for a school. The site is well located in respect of pedestrian and public access to services, and could provide for housing and open space use.	Allocate for housing development.	The site has not been declared surplus by the Education Authority. In any event it is a greenfield site which would not be required for development this plan period given the results of the urban capacity work that has been undertaken.	No change.
164		6.17	1	Archaeological and Ground Contamination Assessments	If these assessments are required they should, for clarity, be included in the site specific obligations.	Add assessments to the site specific obligations.	In the last Local Plan it was the Government Office's advice to exclude the need for assessments from the site specific obligations and refer to them in the text. An assessment would need to accompany an application not be subject to a Section 106 Agreement.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		6.18	1	Ensuring the Most Sustainable Sites are Developed Early	Fails to provide an adequate account of the characteristics of the RAF Quedgeley site in relation to Government policy. Inadequate explanation of how the sequential approach has been, or is intended to be applied in Gloucester. Doesn't acknowledge that RAF Quedgeley needs to be treated as a whole.	Re-draft the paragraph.	Agree in part. The Chesterton Housing Market Issues Report has indicated that it is unnecessary to phase RAF Quedgeley for market reasons. The further work on urban capacity has led to the housing strategy being reconsidered and the revisions to the New Housing section of the Chapter means that this paragraph can be deleted together with PolicyH.3.	Delete Paragraph 6.18.
34	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront.	Other green field sites should be allocated besides RAF Quedgeley.	The land to the north of Brionne Way should also be phased with the Western Waterfront.	The further work on urban capacity has shown that there is no need to consider allocating greenfield land this plan period, other than at RAF Quedgeley. To do so would be contrary to national guidance in PPG3. Since Brionne Way is not proposed for allocation it does not require to be phased.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	The policy does not accord with Government advice on phasing in PPG12 and seeks to impose rigid constraints upon the release of land. The pace of development of brownfield land depends on many factors which could limit their development in the plan period, and this coupled with a rigid phasing approach may prevent the strategic housing requirement being constructed. This is contrary to the objectives of the planning system and the need to provide an adequate and continuous supply of land for housing.	Delete the policy.	The housing strategy has been revised in the light of further work on urban capacity and the housing market by Chesterton, and to take account of advice in "Planning to Deliver". It is considered that, given that RAF Quedgeley is a "strategic site" and that all the other sites allocated are brownfield, no breaking of the Plan into phases is required and Policy H.3 can be deleted.	Delete Policy H.3.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	Policy only relates to the two large allocations and does not consider impact of e.g.. unexpected large scale windfalls. The Plan does not address the wider issues of Plan Monitor Manage. The date 2007 is in the latter part of the Plan period and may affect the ability of the City to meet its Structure Plan housing requirement. It is later than Stroud DC's programme for Hunts Grove.	Re-draft the policy.	Agree in part. The housing strategy has been revised in the light of further work on urban capacity and the housing market by Chesterton, and to take account of "Planning to Deliver". It is considered that, given that RAF Quedgeley is a "strategic site" and that all the other sites allocated are brownfield, no breaking of the Plan into phases is required and Policy H.3 can be deleted.	Delete Policy H.3.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	The phasing of the development of the two largest housing sites is based on the deliverability of a site (Western Waterfront) which is not currently available and has "floodplain" and "relocation of bad neighbour use" constraints, with a site (RAF Quedgeley) that will be phased with the construction of a By-Pass that does not currently have funding.	None specified.	The deliverability of Western Waterfront sites has been analysed in further urban capacity work and there is now more confidence about the development of sites within the Plan period. There is also increased certainty that the GSWBP will be completed in the middle of the Plan period. The evidence is that these two sites will deliver the housing numbers expected of them in the Plan period. The policy of phasing RAF Quedgeley with Western Waterfront sites for market reasons has however been shown to be unnecessary. RAF Quedgeley is now considered to be a "strategic site" and Policy H.3 is therefore no longer necessary.	Delete Policy H.3.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	The phasing of Quedgeley must be analysed against the need to complete the By-pass. Further discussion is required.	None specified.	The housing strategy has been revised in the light of further work on urban capacity and the housing market by Chesterton, and to take account of "Planning to Deliver". The changes to the New Housing section of the chapter means that Policy H.3 can be deleted, and that RAF Quedgeley is now to be phased only on transport grounds in accordance with the Highway Authority's view.	Delete Policy H.3.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	<p>This policy will have an arbitrary and damaging effect on the ability to bring forward a sufficient supply of land for housing. The longer the delay in commencing development at RAF Quedgeley and the Western Waterfront the more the strategy of the RPG and Structure Plan will be undermined and lead to pressure for development of other locations around Gloucester. The date of 2007 almost guarantees there will be an arbitrary constraint on dwelling production with as few as 800 dwellings completed at the two main sites by this date, ie. less than a third developed, with only 4 years of the Plan period left to run. Delays in the Local plan process will compound difficulties. The Structure Plan target is unlikely to be achieved. The policy does not take account of the fact that the two sites (RAFQ and WW) will be serving almost completely separate housing markets. Market demand</p>	Delete the policy.	<p>The housing strategy has been revised in the light of further work on urban capacity and the housing market by Chesterton, and to take account of Planning to Deliver. The changes to the New Housing section of the chapter means that Policy H.3 can be deleted, and RAF Quedgeley will be phased in respect of transportation matters only.</p>	Delete Policy H.3.

is still the strongest for
houses with gardens and
these can only be
provided in locations such
as RAF Quedgeley. The
City's aspiration for
Western Waterfront is for

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					high density apartments and flats with a real city feel. It is therefore unacceptable to link the development of the sites by a phasing policy.			
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201	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	<p>The RAF Quedgeley site, due to its scale, constitutes a "strategic site" in terms of the Guidance in "Planning to Deliver", and it would be inappropriate for a specific phasing arrangement to tie the development to completions in the centre.</p> <p>Any phasing mechanism should be transparent and related to development over the Plan period to allow investment in infrastructure to be assessed in tandem with rates of development. Attempting to tie development of a strategic site to an uncertain pace of development at the Western Waterfront is inconsistent with the approach of seeking substantial contributions to the major infrastructure requirements of the City.</p>	Delete the policy.	<p>Agree in part. The housing strategy has been revised in the light of further work on urban capacity and the housing market by Chesterton, and to take account of Planning to Deliver. The changes to the New Housing section of the chapter treat RAF Quedgeley as a strategic site and means that Policy H.3 can be deleted.</p>	Delete Policy H.3

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	<p>Given the overall development needs to be accommodated, there is a need to adopt a more pragmatic approach towards the release of land for development. There should not only be sufficient housing to be provided but LPAs should plan to meet the housing requirements of the whole community to provide opportunity and choice. It is difficult to see how development at RAF Quedgeley will prejudice development at the Western Waterfront. It is considered that in the context of complementary forms of development likely to take place in the central areas and RAF Quedgeley the phasing policy is unnecessary and indeed it could lead to not all the identified development needs being met by the end of the Plan period. The policy lacks clarity in respect of linking development at RAF Quedgeley to the South West Bypass.</p>	Delete the Policy.	The housing strategy has been revised in the light of further work on urban capacity and the housing market by Chesterton, and to take account of Planning to Deliver. The changes to the New Housing section of the chapter means that Policy H.3 can be deleted, and RAF Quedgeley will be phased in respect of transportation matters only.	Delete Policy H.3.

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	The principle of prioritising the regeneration of the Western Waterfront through a phasing policy is supported, but the practicality of linking the completion of dwellings at the two sites is questioned. The policy does not take account of the unpredictability of development, and if development at the Western Waterfront were to be delayed then it will be necessary for the other site to continue in order to meet the strategic housing requirement. It would not be reasonable to expect the housebuilders at RAF Quedgeley to cease development. The policy is contrary to the approach recommended in the Government guidance "The Managed Release of Development Sites" which suggests three phasing periods for the plan. The approach should be based around an annual rate of provision rather than a fixed total, and be subject to regular review.	Replace the policy with one based on the guidance in "The Managed Release of Housing Sites", to be applied to all the identified sites and based on an annualised housing requirement.	Agree in part. Further work by Chesterton on the Housing Market suggests that this policy from a market impact viewpoint, is unnecessary. Given the advice in "Planning to Deliver" RAF Quedgeley is now seen as a "strategic site", and given that only brownfield sites are allocated other than this, it is considered that the Plan does not require breaking into phases. An annual rate of provision is not considered a suitable basis for managing land release at a local level since annual completions fluctuate significantly and would tend to bring pressure to release greenfield sites early and undermine the sequential approach.	Delete Policy H.3.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	H.3		1	The Phasing of RAF Quedgeley with the Western Waterfront	The ability of the Council to control the phasing of development is questioned, and it is noted that after a certain period of time the RAF Quedgeley site can be progressed regardless of the status of the Western Waterfront. It is considered that the policy will prejudice the attractiveness of the city centre location and undermine its viability, increasing the likelihood of development at an edge of town location in advance of city centre proposals, in conflict with Government guidance on the priority locations for new housing development.	Re-draft policy to make it clear that any development at RAF Quedgeley does not take place in advance of sequentially preferable sites in the city centre or other urban extension locations that can offer enhanced sustainable development opportunities. The Council should re-appraise its housing allocations in the light of recent advice to ensure conformity with the search sequence and the promotion of sites that bring sustainable benefits to the city.	The Housing Market work undertaken by Chesterton suggests that there is limited overlap of markets between Quedgeley and the centre of the city .Further work has been undertaken on urban capacity and this informs the proposed changes to the housing strategy set out in the New Housing section of the Chapter. RAF Quedgeley is the most sustainable urban extension since it enables a properly planned community using much previously used land. It is considered to be a "strategic site" under the guidance in "Planning to Deliver" following on from the specific mention of Quedgeley for an urban extension in the Structure Plan. In order to meet the strategic housing target it is inevitable that RAF Quedgeley will have to develop alongside central area opportunities. In addition it will contribute to the construction of the By-pass which will underpin the regeneration of the central area of the city. Consequently Policy H.3 is to be deleted.	Delete Policy H.3.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
28	H.3		3	The Phasing of RAF Quedgeley with the Western Waterfront	This will encourage development of brownfield sites close to the city centre; and will reduce the need for developments elsewhere that would generate more traffic, particularly on green field sites adjoining RAF Quedgeley.		Support noted. However, advice on the housing market from Chesterton indicates that this policy is not justified on market grounds. RAF Quedgeley is now considered to be a "strategic site" in terms of government guidance, and in view of its role in helping to fund the By-pass which will underpin the regeneration of the Central Area, it should not be phased with the Western Waterfront. Therefore Policy H.3 is to be deleted, although phasing on highway grounds is still to be retained (see Policy TR.8).	Delete Policy H.3.

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199	H.3		3	The Phasing of RAF Quedgeley with the Western Waterfront	Support the principle of phasing residential development at RAF Quedgeley and the Western Waterfront in accordance with the sequential approach for the release of land for housing forming part of Government policy.		Support noted. However, advice on the housing market from Chesterton indicates that this policy is not justified on market grounds. RAF Quedgeley is now considered to be a "strategic site" in terms of government guidance, and in view of its role in helping to fund the By-pass which will underpin the regeneration of the Central Area, it should not be phased with the Western Waterfront. Therefore Policy H.3 is to be deleted, although phasing on highway grounds is still to be retained (see Policy TR.8).	Delete Policy H.3.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
48	H.4		1	Housing Proposals on Unallocated Sites	Policy is overly permissive. Some vacant land should be used to improve public open space, particularly in areas where there is an under-provision.	-	The policy does not prevent under-used land from being made into public open space but realistically this will only happen on land in the ownership of the city council. The council is not bound by this policy to develop all its previously used land for houses and can choose to implement a public open space where circumstances justify it. However, a criteria based format for the policy would be helpful.	Amend Policy H.4 to a criteria based format.
122	H.4		1	Housing Proposals on Unallocated Land	Objects to the reference to "redundant previously developed sites" and considers the local Plan should clarify whether other sites that are not redundant but have been proposed for an alternative, more viable use, will be acceptable.	Re-phrase the Policy to clarify its intentions in relation to the Government's advice on housing.	Agree. The term redundant is unnecessary since this will be a test under, for example, Policy E.4 which seeks to protect useful employment land. A criteria based format for the Policy would also be helpful.	Amend Policy H.4 to delete the term "redundant" and have a criteria based format..

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	H.4		1	Housing Proposals on Unallocated Sites	The wording from "subject to..." contains vague and imprecise references to other policies in the plan. The policy should set out criteria against which proposals are to be assessed.	Re-draft the policy.	The policy format is based on that recommended by the Planning Inspector following the 1993 Local Plan Inquiry and was not objected to by the Government Office in the 1996 Interim Adoption version of the last Local Plan. However, a criteria based format would be helpful.	Amend Policy H.4 to a criteria based format.
170	H.4		1	Housing Proposals on Unallocated Sites	The redevelopment of brownfield land should take priority without the qualifications attached to this policy.	Delete the last three lines of the policy.	Disagree. It is correct that the Local Plan Strategy should be given some protection, and that there is not a free for all of housing development which could adversely affect such issues as employment land supply and a sustainable distribution of other uses. However, the Policy would benefit from a criteria based format.	Amend Policy H.4 to a criteria based format.
100	H.4	6.20	3	Housing Proposals on Unallocated Sites	None Given.		Support noted. However, it is considered that the Policy would benefit from a criteria based format.	Amend Policy H.4 to a criteria based format.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
8		6.22	1	Written Justification to Policy H.7	The garden sizes do not accord with government guidance in PPG3.	Remove reference to minimum garden sizes.	The garden sizes are only included for guidance to assist in achieving quality in layouts and are not standards that will be rigorously applied. That is why they are not included in an upper case policy.	No change.
167		6.22	1	Housing Density	The text places undue emphasis on achieving the "highest possible" densities notwithstanding the qualifications that follow. This paragraph is contrary to PPG3.	Delete the paragraph.	Agree in part. The term "highest possible densities" is difficult to interpret and unhelpful. The text should be revised to more closely reflect guidance in PPG3 and be consistent with Policy H.14.	Amend Paragraph 6.22 accordingly..
217		6.22	1	Garden sizes	It is inappropriate for the Plan to set garden sizes. What is appropriate will reflect the individual scheme, its area context, its housing mix, and potential occupiers.	Delete reference to garden sizes.	The garden sizes are only included for guidance to assist in achieving quality in layouts and are not standards that will be rigorously applied. That is why they are not included in an upper case policy.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
48	H.7		1	Housing Density and Layout	Policy would create over-development. In inner city areas a lower density than 30dpha would enable improved amenities.	-	The policy does not promote over-development and includes wording to ensure existing character and amenities are respected. Government policy is to avoid densities lower than 30 dwellings to the hectare, and it is difficult to see how low density development would provide improved amenities for inner city areas. The Policy is however to be re-worded to better reflect government guidance.	Amend Policy H.7 to better reflect guidance in PPG3.
122	H.7		1	Housing Density and Layout	The policy is unclear in respect of the need for doorstep play areas and has little regard for Government guidance on planning obligations. A blanket requirement is not justified.	Delete the policy and amend the text (para 6.22) to take account of Circular 1/97.	The need for doorstep play areas is not a blanket requirement but applies only to developments where there aren't private gardens. The Council's SPG on New Housing and Open Space gives guidance on what a Private Space for Play consists of. It would be beneficial if the Policy and accompanying text referred directly to this.	Amend Policy H.7 and Paragraph 6.22 accordingly.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	H.7		1	Housing Density and Layout	The use of the term "generally" introduces an element of uncertainty and detracts from the clarity of the policy. The aim is to encourage more efficient use of land and this should be reflected in the wording.	Re-draft the policy.	Agree.	Delete the word "generally" from Policy H.7.
167	H.7		1	Housing Density and Layout	The policy places undue emphasis on achieving the "highest possible" densities notwithstanding the qualifications that follow. The policy is contrary to PPG3 and is internally inconsistent.	Delete "the highest possible" from the first sentence.	Agree. The term "highest possible densities" is difficult to interpret and unhelpful. The policy should be revised to more closely reflect guidance in PPG3 and be consistent with Policy H.14. On reselection the final sentence of the policy would be better included in the supporting text.	Amend Policy H.7 and the supporting text in Paragraph 6.22 to better reflect guidance in PPG3.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
191	H.7		1	Housing Density and Layout	Further research into the types of open market housing needed for the plan period is required. The Housing Needs Survey focuses on financial not housing needs and is not a basis for general policies. In particular there has been no assessment of demand for high density apartments and flats in the Western Waterfront. General policies for housing mix and density are innappropriate - the mix and density of RAF Quedgeley will be totally different from the Western Waterfront.	Delete the policy and re-write after appropriate research.	It is accepted that density of housing schemes will vary from location to location but a general policy on density is needed to reflect the importance of raising housing densities in line with Government guidance. The policy could however be better worded to better reflect the guidance in PPG3 Housing.	Amend Policy H.7 to better reflect the guidance in PPG3.
167		6.24	1	Housing Needs Survey and Mix of Housing	Objects on the grounds that it seeks to take account of data on housing sizes from a study that is flawed.	Deletion of this paragraph.	Disagree that the Housing Needs Survey is flawed. However, accept that appropriate mixes wil need to take account of local circumstances as well as the city-wide information.	Amend paragraph 6.24 to refer to the need to take account of local circumstances.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	H.8		1	Housing Mix	Reference to meeting local needs and providing visual interest is unrelated to the objective of the policy.	Delete the policy.	Disagree in part. Meeting local needs is a fundamental part of government guidance in PPG3 Housing (paragraphs 9-11). Agree that visual interest is not a material objective of the policy.	Amend Policy H.8 to remove reference to visual interest.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
191	H.8		1	Housing Mix	Further research into the types of open market housing needed for the plan period is required. The Housing Needs Survey focuses on financial not housing needs and is not a basis for general policies. In particular there has been no assessment of demand for high density apartments and flats in the Western Waterfront. General policies for housing mix and density are innappropriate - the mix and density of RAF Quedgeley will be totally different from the Western Waterfront.	Delete the policy and re-write after appropriate research.	The Housing Needs Survey 2000 included a statistically robust assessment of demand for different housing sizes over the next five years from all income groups within the city, not just those in need of affordable homes. It is difficult to research accurately demand from in-migrants. However, the Report by Chesterton on Housing Market Issues indicates that local agents are optimistic that the whole of the Western Waterfront allocation could be effectiveley marketed in the plan period to 2011. It is accepted that appropriate mixes will vary from location to location, and this will be a matter for negotiation at the time of planning applications. Hpwever, achieving a mix of housing is a key element of government policy and warrants a general policy.	No change.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	H.8		1	Housing Mix	The Plan should recognise that not all sites will be able to provide a mix of house sizes and types, despite local needs.	Amend policy to give recognition to site specific circumstances which dictate against the preferred mix.	Agree in part. Small sites may not always be able to provide a mix, although the house type proposed should take account of the existing mix in a neighbourhood and seek to contribute to a balanced community.	Amend Policy H.8 to refer to the aim of building balanced communities and to allow local circumstances to be taken into account at the time of a planning application.
167	H.8		1	Housing Mix	Support the policy in principle but it is over-simplistic and should be expanded to include the criteria to be followed to assess an appropriate mix.	Additions to the policy.	Agree. The policy needs to refer to the need to build balanced communities taking account of local circumstances to provide flexibility.	Amend policy H.8 to refer to balanced communities and local assessment.
100	H.8	6.24	3	Housing Mix	None Given.		Support noted.	No change.
100	H.9	6.25	3	The Protection of Existing Residential Properties	None Given.		Support noted.	No change.
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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
132	H.11		1	Improving Residential Environments	The policy should include a statement that the Council will use its CPO powers to effect such development.	Amend the policy to include reference to use of CPO powers.	Implementing Compulsory Purchase Powers would be a practice of the Council and is not a land use policy. A commitment in the Plan indicating the Council would pursue this approach would not encourage landowners to use their best endeavours to cooperate over development schemes, and could involve the council in considerable expense. CPO's should be a last resort.	No change.
100		6.31	1	Supporting Text relating to the Conversion of Houses to Flats	Special reference should be made to conversions by Registered Social Landlords since they are in a position to restrict the occupation of properties to non car-owning tenants and can ensure no highway impact.	Add reference to RSL's in text.	Agree. The additional text suggested may help bring forward more conversions at affordable prices.	Amend Paragraph 6.31 to refer to RSL development.
164	H.12		1	The Conversion of Houses to Flats	The issue of acceptable soundproofing arrangements is a matter more appropriately dealt with under the Building Regulations.	Delete the last sentence.	Agree.	Delete last sentence of Policy H.12.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	H.13		1	The Sub-division of Plots for In-fill Development	It is not reasonable to restrict development which may prejudice the comprehensive development of adjacent land.	Remove criterion 3 from the policy, or amend it to refer to adjacent comprehensive development which is the subject of either a planning permission or planning brief.	Disagree. This criterion is essential if efficient use of land and avoiding waste of resources is to be achieved.	No change.
100		6.35	2	Definition of Affordable Housing	The definition in paragraph 6.35 is limited in scope.	A more comprehensive local definition of affordable housing could be set out based on the relationships between house prices and incomes and there should be a reference to key workers.	Agree in part. The definition should include a reference to the level of local incomes and their relationship to house prices or rents. It is not considered necessary to refer to key workers as the housing should be available to anyone who cannot afford to rent or buy houses on the open market. It is not considered that key workers should be separated from other groups in housing need.	Amend paragraph 6.35 to include a reference to local incomes and their relationship to local house prices

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
145		6.35	1	Definition of Affordable Housing	The definition of affordable housing is partly in accordance with Circular 6/98 however it should be made clear that it should include both low cost market and subsidised housing.	None given.	Agree. The definition needs to be reworded to include both low cost market and subsidised housing to accord with Circ. 6/98. However due to the relatively cheap low cost market housing already available in the centre of Gloucester, it should be emphasised that the need is for rented housing in Gloucester with the exception of Quedgeley which requires both.	Amend paragraph 6.35 to include low cost market and subsidised housing in the definition, but explain the need is predominantly for rented housing with the exception of Quedgeley.
206		6.35	1	The Definition of Affordable Housing	The definition of affordable housing is too narrow and restrictive and inflexible because it focuses on income levels only.	Reword definition.	Agree. Circ. 6/98 highlights that definitions should refer to the level of local incomes and their relationship to house prices or rents.	Amend paragraph 6.35 to include a reference to local incomes and their relationship to local house prices and rents.

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Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
145		6.36	1	Housing Needs Survey	It is not accepted that the HNS 2000 is comprehensive, or that it has been carried out in accordance with the DETR Good Practice Guide. The methodology used by Fordham is fundamentally flawed resulting in an exaggerated level of need for social rented housing and does not fully consider all housing need or the range of tenure options. A target of 526 dwellings per year to meet the shortfall is unachievable.	None given.	The Housing Needs Survey highlights that the commissioning and Fieldwork for the survey were conducted before the government guidance was issued but minor adjustments were made to the report after the publication of the guidance so the report complies with the guidance. The plan does not state whether 526 dwellings per year is achievable but it is the target considering the housing need.	No change
164		6.36	1	Housing Needs Survey	While the information from the latest housing needs survey is helpfully included, no indication is provided regarding the level of different types of affordable housing needed by households of different characteristics, in helping to meet needs.	none given	The Housing Needs Survey highlights that over the next five years there will be a shortfall of owner-occupied housing. Para 6.35 will be amended to highlight that the predominant need in the area is for rented housing with the exception of RAF Quedgeley where low cost market housing and rented housing would be acceptable.	Amend paragraph 6.35 to highlight type of affordable housing needed

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		6.36	1	The Provision of Affordable Housing	Objects to the paragraph because it summarises the conclusions of a document which they believe to be methodologically unsound and should not be relied upon.	Deletion of paragraph.	The Housing Needs Survey highlights that the commissioning and Fieldwork for the survey were conducted before the government guidance was issued but minor adjustments were made to the report after the publication of the guidance so the report complies with the guidance.	No change
100		6.36	3	Housing Needs Survey	Supports the fact that an up to date and rigorous district housing needs survey was completed in 2000 which has uncovered a severe shortage of affordable housing in the city.		Support noted.	No change.

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Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
154		6.37	1	The Provision of Affordable Housing	<p>Objects to 40% of developable areas. It the developable area is a net site density then this could result in the proportion of affordable homes being greater than 40% of the total number of homes on the site.</p> <p>Seeking 40% as part of the hospital redevelopment would be inappropriate. The fact that the disposal of the hospital site is linked to the redevelopment of the hospital should be given due consideration.</p> <p>Objects to the site size threshold in the policy and this is not properly justified.</p>	<p>Amendment of the threshold size of site on which affordable housing will be sought. And reference 40% only as an overall target which would satisfy some of the identified need and not as a target sought on individual sites.</p>	<p>Agreed, the threshold will be reduced in paragraph 6.37 to sites of 15 or more dwellings or on sites of 0.5ha in accordance with government guidance. The figure of 40% affordable homes will be changed to 40% of the net site area of new housing sites to allow for outline applications. This will be an overall target figure to allow for the possibility of some sites not being suitable for affordable housing provision.</p> <p>The figure of 40% is supported by the Housing Needs survey which highlights that in the face of a requirement for 526 additional affordable homes per year, a target of at least 40% is required.</p>	<p>Amend wording and threshold size in paragraph 6.37</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
155		6.37	1	The Provision of Affordable Housing	<p>Objects to 40% of developable areas. It the developable area is a net site density then this could result in the proportion of affordable homes being greater than 40% of the total number of homes on the site.</p> <p>Seeking 40% as part of the hospital redevelopment would be inappropriate. The fact that the disposal of the hospital site is linked to the redevelopment of the hospital should be given due consideration.</p> <p>Objects to the site size threshold in the policy and this is not properly justified.</p>	<p>Amendment of the threshold size of site on which affordable housing will be sought. And reference 40% only as an overall target which would satisfy some of the identified need and not as a target sought on individual sites.</p>	<p>Agreed, the threshold will be reduced in paragraph 6.37 to sites of 15 or more dwellings or on sites of 0.5ha in accordance with government guidance. The figure of 40% affordable homes will be changed to 40% of the net site area of new housing sites to allow for outline applications. This will be an overall target figure to allow for the possibility of some sites not being suitable for affordable housing provision. The figure of 40% is supported by the Housing Needs survey which highlights that in the face of a requirement for 526 additional affordable homes per year, a target of at least 40% is required.</p>	<p>Amend wording and threshold size in paragraph 6.37</p>
167		6.37	1	The Provision of Affordable Housing	<p>Objects to the paragraph on the grounds that it makes an unwarranted logical leap from the main analysis to the conclusion that an overall target of 40% affordable housing should be sought. It is not accepted that a target of 40% can be justified in Gloucester City.</p>	<p>Deletion of paragraph.</p>	<p>The Housing Needs survey highlights that with a requirement for 526 additional affordable homes per year, a target of at least 40% is required.</p>	<p>Amend paragraph 6.37 to highlight that it is 40% of the net site area of new housing sites that should be affordable.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
206		6.37	1	The Provision of Affordable Housing	<p>The 40% target is unreasonable because it is based on a quota and on unfounded assumptions. It would result in a requirement out of scale and kind with development proposals. Target is contrary to Govt. guidance. The threshold of 5 dwellings is unreasonable because it is set too low. The wording of the text is inflexible because it provides no scope for excluding sites from the threshold if it can be demonstrated that circumstances justify no affordable housing.</p>	<p>Reduce the target % and reword the paragraph. The thresholds should be amended to 25 or more dwellings or 1ha or more in size.</p>	<p>Partly agree, it is considered that the 40% target is an overall target and allows for a lower percentage if the site is constrained. Agreed the target is contrary to government guidance. The threshold will be increased to 15 dwellings/ 0.5ha. It is not considered that the higher threshold of 25 dwellings is appropriate in Gloucester due to the high level of housing need.</p>	<p>Amend paragraph 6.37 and include lower threshold.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164		6.37, 6.38, 6.39	1	The Provision of Affordable Housing	The plan should define what the authority regards as affordable and this should include both subsidised and low cost market housing. Definitions should be framed to endure for the life of the plan through references to the level of local incomes and their relationship to house prices and rents. It would be premature for the assumption to be made that there will not be any significant role for low cost market housing over the lifetime of the Plan.	The Plan should make it clear that affordable housing is defined as both subsidised and low cost market housing.	Agreed, the definition in paragraph 6.35 should include reference to both low cost market and subsidised housing. Paragraph 6.35 should also include a reference to the relationship between income and house prices. Paragraph 6.38 should describe the type of affordable housing needed	Amend paragraph 6.35 to include reference to Low Cost Market and subsidised housing and reference to incomes and the relationship to house prices and rents. Amend paragraph 6.38 to highlight that the biggest role will be for rented housing with the exception of development at RAF Quedgeley.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
145		6.38	1	The Provision of Affordable Housing	The whole paragraph is inappropriate and should be removed. It is clearly unfair that free land and additional funding is supplied by the developer because of the lack of grant funding available to an RSL to make the scheme financially viable. The decision to fund schemes and the availability of funds are not planning issues and should not be included in the Local Plan or SPG. In addition the Council should work with all housing providers and not just RSLs to ensure that affordable housing is delivered effectively.	Delete paragraph.	Involving RSL's is an effective and direct way of providing affordable housing. It is recommended that the paragraph is amended to state that this is the council's preferred approach.	Amend paragraph 6.38 to state that it is the preferred approach and delete last paragraph in accordance with revised description of affordable housing.
154		6.38	1	The Provision of Affordable Housing	Amendment of the threshold size of site on which affordable housing will be sought. And reference 40% only as an overall target which would satisfy some of the identified need and not as a target sought on individual sites.	The approach should be stated as being the Councils preferred approach rather than the only approach.	Agree, threshold needs to be amended to be in accordance with government guidance. Suggested amendment to 15 dwellings / 0.5ha. 40% will be an overall target rather than for individual sites.	Amend paragraph 6.37 and in paragraph 6.38 state that it is the governments preferred approach.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
155		6.38	1	The Provision of Affordable Housing	Amendment of the threshold size of site on which affordable housing will be sought. And reference 40% only as an overall target which would satisfy some of the identified need and not as a target sought on individual sites.	The approach should be stated as being the Councils preferred approach rather than the only approach.	Agree, threshold needs to be amended to be in accordance with government guidance. Suggested amendment to 15 dwellings / 0.5ha. 40% will be an overall target rather than for individual sites.	Amend paragraph 6.37 and in paragraph 6.38 state that it is the governments preferred approach.
167		6.38	1	The Provision of Affordable housing	Objects to the paragraph on the grounds that what the Council is seeking is excessively onerous on developers and contrary to Circ. 6/98.	Deletion of paragraph.	Target is an overall target and the transfer of sites and financial contribution is a preferred approach	No change with addition of text highlighting that it is the council's preferred approach
206		6.38	1	The Provision of Affordable Housing	The extent of land, buildings plus a financial contribution is excessive and considered to be unreasonable. The wording is inflexible by not allowing scope for other methods of provision. The statement that land be transferred free of charge is considered to be unreasonable and unlawful. The statement that land is transferred to RSLs is considered to be too onerous and unreasonable given that other providers may exist.	Revise text to advise that lower levels of provision are appropriate, delete reference "land to be transferred free of charge" and revise text to allow other providers to be considered.	It is advised that the paragraph highlights that it is the preferred approach. Paragraph 6.37 will also highlight that 40% is an overall target and does highlight that if a site is constrained affordable housing provision below 40% may be justified.	Amend paragraph 6.38 to state that this is the preferred approach.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		6.39	1	The Provision of Affordable Housing	Objects to the paragraph because of the reference to inappropriate SPG on Affordable housing.	Deletion of paragraph.	It is important to refer to the SPG on Affordable housing as this gives further detail on the background to the policies. The SPG will be updated to be in accordance with the local plan	No change
206		6.39	1	The Provision of Affordable Housing	The exclusion of other forms of affordable housing tenure is unreasonable and too onerous.	Delete reference.	The definition of affordable housing will be amended in paragraph 6.35, the Supplementary Planning Guidance will be amended to conform	No change to paragraph 6.39
1	H.15		1	The Provision of Affordable Housing	Need to specify 'client group'. Do not want drug addicts, dealers, drunks. Affordable housing will completely deter development of smaller sites.	No more Housing Association properties for young people.	Disagree. The affordable housing is open to people who can't afford to buy or rent on the open market. The client group should not be specified further. The increase in the threshold level to 15 houses / 0.5ha means the development of very small sites will be unaffected.	Amend thresholds in policy H15
4	H.15		1	The Provision of Affordable Housing	Do not want Housing Association homes on the Grange Road Infant School site (H.2 site 10).	Only 'select' homes should be built on the Grange Road Infant School site.	Disagree. The site has an area of 1.24ha . As it is above the threshold, some affordable homes should be provided on the site.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
34	H.15		1	The Provision of Affordable Housing	<p>Although the quantum of affordable housing is not disputed, imposing 40% is unreasonably high and place a break on many sites coming forward for development.</p> <p>Landowners will be unwilling to accept a dilution of their land values. The Council's aspirations is more likely to be achieved through releasing more greenfield sites and allowing their release concurrently with brownfield opportunities.</p>	Amend 40% target figure and release greenfield sites.	The policy seeks an element of affordable housing on all suitable sites of 15 dwellings or more / 0.5ha whether greenfield or brownfield. The policy will be amended to state that 40% is an overall target of the net site area	Amend policy H15 to highlight that 40% is an overall target of the net site area.

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Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
100	H.15	6.37	1	The Provision of Affordable Housing	<p>Welcomes the challenging overall city wide target of 40% however a distinction must be drawn between any overall target and site specific targets. More than 40% will have to be achieved on particular sites if this overall target is to be achieved. 40% may prove very high in terms of achieving socially balanced communities and may also prove very difficult to achieve on brownfield sites. Objects to the withdrawal of permitted development rights on a blanket basis. Welcomes the low site threshold of 5 or more dwellings (or 0.2 ha) but are unsure as to how achievable a target it is. Government. guidance states that LPAs should not adopt thresholds below the lower level of 15 dwellings or 0.5 ha so very compelling arguments based on local circumstances will have to be presented to justify a lower figure.</p>	Delete the paragraph on the removal of permitted development rights.	<p>Policy H15 will be amended so 40% is an overall target of the net site area. The threshold in policy H15 will also be revised upwards in accordance with government guidance. To ensure that the properties provided through the application of the policy remain affordable it is considered appropriate to remove the permitted development rights</p>	<p>No change to paragraph on Permitted Development Rights. Amend target and threshold in Policy H15.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	H.15	6.35 6.36 6.37 6.38	1	The Provision of Affordable Housing	<p>Objects to the affordable housing policies and justification text due to the unclear and unjustified assessment of local housing needs through the Housing Needs Survey 2000. Consider the need to be inflated. Concerned that the targets identified are not clearly justified by housing need and contrary to Circular 6/98. The targets are unclear and apply standardised formulae and are not related to local circumstances, they are totally inflexible and provide little or no opportunity for negotiation, the Local Plan does not demonstrate the compatibility of the needs assessment in light of DETR good practice, the blanket formulation of the affordable housing requirement is contrary to Circular 6/98, the policy seeks to promote socially rented housing rather than all forms of tenure, the potential unlawfulness of requirement the provision of affordable housing at nil subsidy, the</p>	<p>The local plan must be amended significantly to reduce the 40% target for provision. Policy H15 and paragraphs 6.35 to 6.39 should be amended and updated to reflect national guidance and case law.</p>	<p>The Housing Needs Survey was written after the publication of the new guide on Housing Needs assessment. The approach was adapted to comply with the requirements. The overall target of 40% is stated in the Housing Needs Survey as being necessary to achieve the need for affordable housing. The definition of affordable housing will be amended to include both low cost market and rented housing. Additionally policy H15 does acknowledge that the amount of affordable housing will be negotiated on the basis of site and market conditions at the time of the application.</p>	<p>Policy H15 will be amended to highlight that 40% is an overall target of all the net site area of all new housing sites and the definition of affordable housing will be amended in paragraph 6.35 to include low cost market and rented housing.</p>

management of affordable
housing should be
appropriate to RSL
management requirements
and the costs of managing
a dispersed housing
stock. They object to the

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					inclusion of a 40% target considering it to be unduly excessive and unrealistic given the local circumstance. Affordable housing should be negotiated and applied flexibly as determined by land value, local market conditions, local need and other unique site circumstances.			

CHAPTER 6 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
132	H.15		1	The Provision of Affordable Housing	The requirement to provide affordable housing on 40% of the developable area of new housing sites is unreasonable. No justification is set out in the plan for such a requirement. The Policy should also provide that abnormal costs of development will be taken into account so as to reduce the affordable housing requirement.	None given.	Paragraph 6.37 and Policy H15 will be amended to state that 40% is an overall target of the net site area of new housing sites, this target is supported by the research in the Housing Needs Survey. Policy H15 will also highlight that the amount of affordable housing will be negotiated on the basis of site and market conditions.	Amend policy H15 and paragraph 6.37
CHAPTER 6		T = TYPE 1 - Objection 2 - Omission 3 - Support						

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
145	H.15	6.37	1	The Provision of Affordable Housing	<p>Objects to the target of 40% as this is not based on a robust and rigorous assessment of housing need. The recognition that this target may be adjusted subject to constraints is supported. The wording should be revised to more accurately reflect the full requirements of paragraph 10 of Circular 6/98.</p> <p>Objects to the site size threshold which clearly falls well below that required in paragraph 10 of C 6/98. The Council have not demonstrated exceptional local constraints in terms of the level of housing need or limited land supply.</p>	<p>Suggests that policy H.15 is redrafted to read: "On sites which are acceptable to housing in accordance with other policies of this plan and which are large enough to accommodate a reasonable mix of types and sizes of housing the Council will seek, by negotiation with developers, to secure an element of affordable housing, on suitable sites. In assessing the suitability of such sites for the provision of an element of affordable housing, the Council will take into account: i) site size, suitability and the economics of provision and ii) the need to achieve a successful housing development. The size and type of dwellings provided shall reflect the needs of those households requiring affordable housing, who cannot ordinarily afford to buy or rent suitable accommodation on the open market".</p>	<p>The target of 40% is suggested by the Housing Needs Survey which was based on an approach closely modelling the latest government guidance on housing needs assessments. The threshold will be revised to reflect the government guidance in paragraph 10 circular 6/98, the lower threshold is required to provide for the need demonstrated in the Housing Needs survey.</p>	<p>Amend policy H15 to state that the target is an overall target and revise the thresholds</p>
147	H.15		1	The Provision of Affordable Housing	<p>The 40% target is extremely high and may be in certain cases, unduly onerous on some new developments undermining their financial viability.</p>	<p>The % target should be decided on a site specific basis dependent on housing need and site specific circumstances. This approach to obligations must be reasonable, related to the scale and nature of development proposals to ensure that they do not undermine the financial viability of sites.</p>	<p>Policy H15 will be amended to highlight that 40% is an overall target for the net site area of all new housing sites and that the amount of affordable housing will be negotiated on the basis of site and market conditions at the time of the application.</p>	<p>Amend policy H15 to show that 40% is an overall target and that the amount of affordable housing will be negotiated on the basis of site and market conditions.</p>

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
148	H.15		1	The Provision of Affordable Housing	<p>The 40% target is unreasonable both in terms of the level of provision sought and the terms under which it is sought. The level of expectation ignores the economics of what is expected and the fact that most of the allocated housing sites are previously developed. The policy states that the requirement sought is a % target of the developable site area and not a % of number of built units. The text or policy makes no reference to the fact that low cost or shared equity ownership could provide part of the requirement for affordable housing.</p>	<p>The % of affordable housing required and the mechanisms for its provision should be reconsidered to reflect Government guidance and provide a range of options for securing affordable housing. The reference to a % of the developable area of the site should be removed and replaced with a % of units to be provided.</p>	<p>Noted, the 40% will be amended to be an overall target and it will be emphasised that in some cases abnormal costs of development may reduce the affordable housing requirement. The % is of the net site area, not the number of built units, so the policy can be applied to outline schemes. The definition of affordable housing will be amended in paragraph 6.35 to include low cost market and subsidised housing.</p>	<p>Amend policy H15 to show 40% is an overall target and paragraph 6.35 regarding the definition of affordable housing.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	H.15		1	The Provision of Affordable Housing	<p>The requirements of this policy are too onerous and should be reduced. This is contrary to PPG3 and C16/95. Such provision is site specific and needs to be negotiated in each case. Govt. guidance defines AH as comprising RSL and low cost open market. Restricting PD rights is not helpful and can be dealt with by condition at the time of application.</p>	None given.	<p>The 40% is an overall target, but the policy allows for the provision to be negotiated if the abnormal development costs reduce the amount of affordable housing that can be provided. The definition of affordable housing will be amended to include both low cost market and subsidised housing. It is considered that restricting P.D rights is appropriate to ensure properties remain affordable. Owners can still apply for planning permission to extend the property.</p>	<p>Policy H15 will be amended to highlight that 40% is an overall target of the net site area of all new housing sites and the definition of affordable housing will be amended in paragraph 6.35 to include low cost market and rented housing.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
154	H.15		1	The Provision of Affordable Housing	<p>Objects to 40% of developable areas. It the developable area is a net site density then this could result in the proportion of affordable homes being greater than 40% of the total number of homes on the site.</p> <p>Seeking 40% as part of the hospital redevelopment would be inappropriate. The fact that the disposal of the hospital site is linked to the redevelopment of the hospital should be given due consideration.</p> <p>Objects to the site size threshold in the policy and this is not properly justified.</p>	<p>Policy H.15 should be redrafted to read: "The City Council will seek the provision of an element of affordable housing on new housing sites of 25 or more dwellings on sites of 1 ha or larger, irrespective of the number of dwellings. The amount of affordable housing will be negotiated having regard to the level of demonstrable housing need, site conditions, constraints and the economics of provision. Affordable housing includes both low cost market and subsidised housing and is defined as The housing provided under this policy will be subject to a planning obligation".</p>	<p>Policy H15 will be amended to highlight that 40% is an overall target for the net site area of all new housing sites and that the amount of affordable housing will be negotiated on the basis of site and market conditions at the time of the application. The threshold given in paragraph 6.35 will be increased to be in accordance with government guidance.</p>	<p>Amend policy H15 to show that 40% is an overall target and that the amount of affordable housing will be negotiated on the basis of site and market conditions and amend thresholds in policy H15.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
155	H.15		1	The Provision of Affordable Housing	<p>Objects to 40% of developable areas. It the developable area is a net site density then this could result in the proportion of affordable homes being greater than 40% of the total number of homes on the site.</p> <p>Seeking 40% as part of the hospital redevelopment would be inappropriate. The fact that the disposal of the hospital site is linked to the redevelopment of the hospital should be given due consideration.</p> <p>Objects to the site size threshold in the policy and this is not properly justified.</p>	<p>Policy H.15 should be redrafted to read: "The City Council will seek the provision of an element of affordable housing on new housing sites of 25 or more dwellings on sites of 1 ha or larger, irrespective of the number of dwellings. The amount of affordable housing will be negotiated having regard to the level of demonstrable housing need, site conditions, constraints and the economics of provision. Affordable housing includes both low cost market and subsidised housing and is defined as The housing provided under this policy will be subject to a planning obligation".</p>	<p>Policy H15 will be amended to highlight that 40% is an overall target for the net site area of all new housing sites and that the amount of affordable housing will be negotiated on the basis of site and market conditions at the time of the application. The threshold given in paragraph 6.35 will be increased to be in accordance with government guidance.</p>	<p>Amend policy H15 to show that 40% is an overall target and that the amount of affordable housing will be negotiated on the basis of site and market conditions and amend thresholds in policy H15.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	H.15		1	The Provision of Affordable Housing	<p>The level of affordable housing of 40% and greater in some cases is extremely high. An important aspect of new housing is that sites offer a variety of types and mix of sizes. Therefore the high % of affordable housing could impact the deliverability of schemes.</p> <p>Affordable housing is in addition to 15% of all housing being Lifetime Homes in accordance with Policy H18. This is significant because of the redevelopment of PDL/brownfield sites and their remediation costs.</p>	None given.	<p>Policy H15 will be amended to highlight that 40% is an overall target for sites and that in some cases abnormal development costs will need to be taken into account which may reduce the affordable housing requirement.</p>	<p>Amend policy H15 to show that 40% is an overall target and that the amount of affordable housing will be negotiated on the basis of site and market conditions</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	H.15	6.37	1	The Provision of Affordable Housing	<p>Circular 6/98 advises that the seeking of affordable housing should only be applied to housing developments of 25 or more dwellings or 1 ha or more irrespective of the number of dwellings. Exceptional circumstances may allow for thresholds of 15 dwellings or 0.5 ha. However, the Plan has not adequately justified why it seeks to include thresholds as low as 5 dwellings or 0.2 ha. Criterion 4 of the policy is unreasonable in that it seeks to impose a blanket withdrawal of permitted development rights. This could be dealt with on an application specific basis.</p>	Justify the site size thresholds and delete criterion 4 of policy H.15.	<p>Noted, the thresholds in the policy will be amended to 15 or more dwellings/0.5ha, this lower threshold is required to provide for the affordable housing need demonstrated in the Housing Needs Survey and to achieve a mix of housing on small scale sites. It is considered reasonable to remove permitted development rights to ensure that the properties remain affordable.</p>	Amend thresholds in policy H15
167	H.15		1	The Provision of Affordable Housing	<p>Objects on the grounds that the policy is contrary to the advice set out in C6/98 and PPG3. It is considered that the figure of 40% is unreasonable and excessive, not justified by the supporting text in the Plan or by the Housing Needs Survey itself.</p>	Deletion of this policy.	<p>The target will be amended to be an overall target of the net site area of all sites. The Housing Needs Survey supports the need for a target of 40%.</p>	Amend policy H15 to state that 40% is an overall target of the net site area of all new housing sites.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	H.15		1	The Provision of Affordable Housing	Objects as the policy does not accord with Circular 6/98. A definition of affordable housing should be provided and include low cost and subsidised housing. The policy seeks to impose lower thresholds than those in C6/98. The policy is onerous. The level of 40% is not justified and should be lowered to 25% and related to numbers and not the developable area.	The policy should be amended to comply with the terms of Circular 6/98.	Noted, the definition of affordable housing will be amended in paragraph 6.35 to include low cost market and subsidised housing. It is not considered necessary to include the definition of affordable housing within policy H15. The thresholds will be increased to 15 dwellings / 0.5ha to accord with circular 6/98. The target of 40% is justified in the Housing Needs Survey as being a necessary target to provide for the affordable housing required. The target would relate to the net site area and not numbers as this would be difficult to implement at the outline stage of planning applications.	Amend policy H15 to include an overall target of 40% of the net site area and increased thresholds. The definition of affordable housing will be amended in paragraph 6.35
170	H.15		1	The Provision of Affordable Housing	The target of 40% is too great and fails to take account of the market ability to bring land forward for development and fails to recognise the 'on costs' of developing brownfield sites or sites where other obligations might be required. The threshold of 5 dwellings is too low.	Reduce 40% to 25% and qualify to take account of site circumstances and retain threshold of 15 dwellings.	Policy H15 will be amended to highlight that 40% is an overall target for sites and that in some cases abnormal development costs will need to be taken into account which may reduce the affordable housing requirement. Threshold to be increased to 15 dwellings.	Make appropriate changes to policy H15

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
196	H.15	6.35, 6.36	1	The Provision of Affordable Housing	<p>Paragraphs 6.35 to 6.42 and policies H.15, H.16 & H.17 do not refer to the provision of "key worker" housing for those working in essential services such as the NHS. Reference should be made in this section to affordable housing for key workers such as NHS staff who may experience difficulties in accessing the local housing market. The provision of affordable housing for key workers in locations close to health care facilities could help to reduce the need to travel by car.</p>	<p>Amend para 6.35 by inserting the following sentence after the first sentence "It includes housing to meet the needs of specific groups such as key worker housing for people employed in public services such as the NHS". Amend para 6.36 to include an assessment of the need for housing to meet the needs of specific groups, including key workers.</p>	<p>It is not considered necessary according to Circular 6/98 to refer to 'key workers' as the affordable housing should be for anyone who can't afford housing on the open market.</p>	<p>No change</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
199	H.15		1	The Provision of Affordable Housing	The policy does not provide clear and precise guidance for those who need to know about planning policies as it misinterprets PPG3 and C6/98. The threshold of sites is lower than the lowest level recommended in C6/98, the policy refers to 40% of the developable area whilst the text refers to 40% of new houses, the policy implies flexibility of the 40% figure but only refers to levels exceeding 40% in some cases and not lower (e.g. St Oswald's Park)	Redraft the policy to accord with government guidance and clarify the ambiguities highlighted.	The thresholds for sites will be increased to 15 dwellings / 0.5ha thus complying with the lowest level recommended in circular 6/98. The text will be amended. Policy H15 and the supporting text will be amended to state that the target is 40% of the net site area. The policy will also be amended to state that in some cases the amount may exceed 40% and in some cases abnormal costs of development will need to be taken into account which will reduce the requirement.	Amend policy H15 and the supporting text.
200	H.15		1	The Provision of Affordable Housing	The policy does not provide sufficient guidance. The threshold for sites is lower than the lowest level recommended in C6/98. The policy refers to 40% of the developable area and the text refers to 40% of new houses. The policy is ambiguous as it implies flexibility to the 40% but only refers to levels exceeding 40%.	Redraft the policy to accord with government guidance.	Agree, the threshold will be increased to 15 dwellings in accordance with Circ. 6/98. The policy will be amended to be an overall target of the net site area of all new housing sites. The text in paragraph 6.37 will be amended to be in accordance with the policy	Amend policy H15 in terms of the overall target and the the threshold size

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	H.15		1	The Provision of Affordable Housing	<p>The text does not justify a lower threshold of 25 dwellings or 1 hectare. The policy is over prescriptive in how the Council intends the affordable housing to be provided. C6/98 states that LPAs can set overall numeric targets for the whole plan area and set indicative targets for specific sites they cannot set indicative targets for the whole plan area. Policy does not recognise that affordable housing encompasses both subsidised and low cost market housing. The 40% target fails to take into account the economics of provision and it is unrealistic to expect 40%. Affordable housing should only be sought on suitable sites.</p>	<p>Amend policy to read: "The City Council will seek to negotiate the provision of an element of affordable housing on all suitable sites of 25 or more dwellings or on sites of 1 ha or more. PD rights for all properties provided through the application of this policy will be withdrawn to ensure that affordable houses are not enlarged or altered in ways that would change their affordability for future occupiers".</p>	<p>Partly agree, the threshold will be increased to 15 dwellings, this is supported by the Housing Needs Survey. The Housing Needs Survey supports the use of a 40% target and ther policy will highlight that site and market conditions will be taken into account which may reduce the affoordable housing requirement. The supporting text in paragraph 6.35 will be amended to include low cost market and subsidised housing.</p>	<p>Amend policy H15 and supporting text paragraph 6.35</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
205	H.15		1	The Provision of Affordable Housing	<p>Although no objection is made to the general aim of the policy, there are some comments. Concerned that the policy does not provide flexibility to allow for site characteristics to be taken into account therefore amend policy to allow for "reasonable flexibility". The policy does not recognise that on-site provision of AH is not always appropriate. The provision off-site at alternative locations or commuted sums are acceptable alternatives.</p>	<p>Amend policy to allow for the detailed provision of affordable housing to be assessed on an individual site basis. Specific reference to the acceptability of provision of units off-site should be included.</p>	<p>Agree, flexibility will be in the policy by amending it to say that the amount of affordable housing will be negotiated on the basis of site and market conditions. Paragraph 2 will be amended to include a reference to the payment of commuted sums for off-site provision in exceptional circumstances.</p>	<p>Amend policy H15 to include flexibility and reference to commuted sums.</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
206	H.15		1	The Provision of Affordable Housing	<p>The 40% target is unreasonable because it is based on a quota and on unfounded assumptions. It would result in a requirement out of scale and kind with development proposals. Target is contrary to Government guidance. The threshold of 5 dwellings is unreasonable because it is set too low. The wording of the text is inflexible because it provides no scope for excluding sites from the threshold if it can be demonstrated that circumstances justify no affordable housing. The policy is imprecise and unclear and does not fully explain the circumstances under which affordable housing may not be required. The provision of land, buildings plus a financial contribution is excessive and considered to be unreasonable.</p>	<p>Reduce the target % and reword the paragraph. The thresholds should be amended to 25 or more dwellings or 1ha or more in size. Revise policy to consider windfall sites and criteria for defining suitable sites. Revise text to advise that lower levels of provision are appropriate.</p>	<p>The 40% target will be an overall target of the net site area of all new housing sites. The policy allows for flexibility by saying that in some cases abnormal costs of development will reduce the affordable housing requirement. The threshold will be increased to 15 dwellings. It is not considered that the provision of land and a financial contribution is excessive especially as the policy offers in some circumstances that it may be acceptable to provide the equivalent contribution in built units and in exceptional circumstances commuted sums may be acceptable.</p>	<p>Amend target and thresholds in policy H15 and add in reference to commuted sums for off-site provision</p>

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
212	H.15		1	The Provision of Affordable Housing	The 40% target on all larger sites is over prescriptive and that local conditions and prevailing needs should be the guide.	Policy to be re-worded "The City Council will generally seek affordable housing on a % of the developable area of the site in accordance with prevailing needs and conditions..."	The policy will be amended to state that 40% is an overall target of the net site area of all new housing sites but does highlight that the amount will be negotiated on the basis of site and market conditions and in some cases due to development costs the amount will be reduced.	Amend policy H15 to be an overall target.
217	H.15		1	The Provision of Affordable Housing	The 40% target is an unusually high % requirement. It is unclear how the stated affordable housing needs relate to the planned housing growth set by the Structure Plan. Questions whether the Housing Needs Survey has been properly incorporated into the Review.	Policy should be re-worded to read 'net developable area' which would then reflect the fact that developers are expected to provide already serviced plots.	The 40% target is supported by the Housing Needs Survey, the policy will be reworded to cover 40% of the net site area of all new housing sites.	Amend policy H15 to refer to 40% of the net site area and that the target is flexible.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		6.40	1	The Provision of Affordable Housing	Objects on the grounds that it is contrary to Circ. 6/98 and makes reference to provision of AH 'in a number of small clusters'. There is no cross reference here to the SPG on Affordable Housing but the SPG refers to an operational definition of a small cluster up to 10 units. Govt. advice gives no guidance on this subject. It is considered that even a general reference to small clusters is inappropriate and should be deleted.	Deletion of paragraph.	Encouraging the provision of affordable housing in small clusters is not contrary to circular 6/98. It is agreed that there should be a reference to the SPG which will supply further details.	Add a cross reference to the Supplementary Planning Guidance
206		6.40	1	The Provision of Affordable Housing	The text is inflexible, too onerous and prescriptive because its intent is to control site design and layout without regard to alternative circumstances and does not allow for instances where urban design reasons justify a single location for affordable housing.	Revise paragraph.	It is considered that the paragraph is flexible as it contains the word 'encourage' .PPG3 paragraph 10 highlights the importance of mixed and inclusive communities	Include reference in paragraph to Supplementary Planning Guidance

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	H.16		1	Affordable Housing Mix, Design and Layout	It is misguided to attempt social inclusion through the distribution of social housing throughout development schemes. Pepper potting is detrimental to the overall coalescence of a development.	None given.	PPG3 paragraph 10 highlights that it is important to help create mixed and inclusive communities. LPA's should encourage the development of mixed and balanced communities.	No change
205	H.16		1	Affordable Housing Mix, Design and Layout	The policy is overprescriptive when it claims to allow for the assessment of individual proposals on their own merits. It should be set out within the SPG.	The following sentence be deleted "In larger schemes, affordable housing should be well distributed across the development site and not segregated from the open market housing".	It is agreed that the supporting text needs to link to the SPG. However, it is considered that the policy is not overprescriptive as it complies with the aim of PPG3 of creating mixed and inclusive communities.	No change to policy H16, amend paragraph 6.40 to include reference to SPG
206	H.16		1	Affordable Housing Mix, Design and Layout	The policy is inflexible, too onerous and prescriptive because its intent is to control site design and layout without regard to alternative circumstances. The paragraph therefore does not allow for instances where urban design reasons justify a single location for affordable housing.	Revise policy.	It is not considered that the policy is inflexible as the policy only states that the affordable housing should be well-distributed across the site and the text uses the words 'will encourage' the housing in small clusters which is not prescriptive.	No change to policy H16

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
100	H.16	6.40	3	Affordable Housing Mix, Design and Layout	Supports the policy on mix and densities to provide a mix of affordable housing to meet local needs & designed to a high standard.		Support noted.	No change to policy H16
145	H.16	6.40	3	Affordable Housing Mix, Design and Layout	There are no objections to the idea of small clusters on large sites subject to the provision of those units in a format that is economically viable to the developer, will be efficient to manage and results in a successful housing development.	None given.	Support noted, it is considered that the policy is flexible enough to allow this.	No change
206		6.41	1	The Provision of Affordable Housing	The text should indicate the basis on which the commuted sums will be calculated. The paragraph is unclear and provides no certainty to developers.	Include a reasonable and clear method of calculating commuted sums in the supporting text.	The paragraph has been amended and will link to the Supplementary Planning Guidance for details on the calculation of commuted sums.	Add in paragraph referring to the SPG for details on the calculation of commuted sums.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
132	H.17		1	Affordable Housing Commuted Sums	The Policy is unreasonable. It should be made clear that a lesser commuted sum would be required in the event of high infrastructure costs. If there is already a high level of affordable housing within an area then no affordable housing should be required.	None given.	On the advice of GOSW, it is recommended that policy H17 is linked to policy H15 and is incorporated into the text. This means that commuted sums are only applicable where developments need to provide affordable housing in accordance with H15 and allows for the fact that due to some development costs, the site may not be suitable for any affordable housing.	Delete policy H17 and incorporate into the text.
145	H.17	6.41	1	Affordable Housing Commuted Sums	Objects to the first sentence of para 6.41 and it should be deleted on the basis of the requirements of para 10 of C6/98. Objects to the reference to "in exceptional circumstances we may accept a financial contribution" as it is not in accordance with para 22 of C6/98.	Amend text and policy accordingly.	It is considered that the first sentence is acceptable as it is stating that 'most' sites will be suitable, not 'all' sites. It is considered that to refer to, "exceptional circumstances" is acceptable as examples of such circumstances are given in the text. On the advice of GOSW policy H17 will now be incorporated into the text	Delete policy H17 and incorporate into the text.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	H.17		1	Affordable Housing Commuted Sums	<p>Policies concerning planning obligations in the Plan should address land use planning matters rather than funding or other financial matters. Where a LPA has decided that an element of affordable housing should be provided in the development of a site, there is a presumption that such housing should be provided as part of the proposed development of the site rather than off site via commuted sums. Further comments are that policy H17 should be expressed as clarification for policy H15, rather than a separate policy and circumstances 1 and 2 of possible exceptional circumstances should be removed and circumstances 3 and 4 be redrafted.</p>	None given	<p>According to paragraph 21, circular 6/98 the affordable housing should be provided on the land in question. Paragraph 22 allows for financial contribution off-site. This will now be stated in policy H15 that there is a presumption that affordable housing should be provided as part of the proposed developments. Policy H17 will now be incorporated as clarification for policy H15, rather than as a separate policy. Circumstance 1 of the list of exceptional circumstances will now be deleted, but the remaining three examples of circumstances will remain the same. It is considered that circumstance 3, the form of development, may be a circumstance where affordable housing is not appropriate to be provided on site as some flat developments may lead to management difficulties with RSL's</p>	Delete policy H17 and incorporate into the text.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	H.17		1	Affordable Housing Commuted Sums	Objects to policy. Exceptional circumstances are not defined. C6/98 clearly indicates that affordable housing should be provided on-site. Criterion 1 "elsewhere" is not specified. Criterion 2 nothing is said about how the question of whether development lends itself to the provision of affordable housing should be resolved. Criterion 3 demonstrates some confusion about what constitutes a housing market area. Criterion 4 is illogical as it does not define the use of the most beneficial opportunity whether it is market housing or other uses other than residential.	Deletion of this policy.	Disagree, although Policy H17 will now be incorporated into the text, the text does highlight examples of exceptional circumstances. Circular 6/98 does highlight that it is preferable for affordable housing to be provided on site and this will be stated in Policy H15, however, paragraph 22 Circ. 6/98 allows for financial contribution off-site. Criterion 1 has now been deleted from the list of criteria, but it is considered that criteria 2, 3 and 4 should remain as examples..	Delete policy H17 and incorporate into the text as clarification for policy H15
168	H.17		1	Affordable Housing Commuted Sums	Objects to policy. The policy should recognise that on some sites it would be inappropriate to seek the provision of any affordable housing either on site or in the form of commuted sums.	None given	Policy H17 will now be deleted and the information expressed as clarification for policy H15 in the text, the commuted sums would not be implemented unless affordable housing was required under policy H15	Delete policy H17 and incorporate into the text as clarification for policy H15

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	H.17		1	Affordable Housing Commuted Sums	This policy does not accord with government advice.	Delete policy.	Disagree, Circular 6/98 paragraph 22, highlights that on particular sites where a requirement for an element of affordable housing would be appropriate, it is nonetheless preferable that a financial or other contribution should be made towards the provision of affordable housing on another site. Policy H17 will now be incorporated into the text as clarification for policy H15, rather than as a separate policy.	Delete policy H17 and incorporate into the text. This text will be amended to give examples of exceptional circumstances and not be an exhaustive list.
3	H.18		1	Lifetime Homes	Object to only 15% target for Lifetime Homes	All new homes should be Lifetime Homes	The 15% target is supported by the Housing Needs Survey (October 2000) which highlights that 11.1% of the population have special needs. It was decided that the % of Lifetime Homes should be higher than this to accommodate a number of houses being in the process of changing hands and that some of the homes may be lived in by people without special needs. A new sentence will be included in paragraph 6.45 explaining the methodology for the amount of Lifetime Homes.	Addition of explanation for percentage in paragraph 6.45 and the addition of the words, 'across all types' in paragraph H18.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	H.18	6.43	1	Lifetime Homes	Lifetime Homes requirement duplicates responsibilities of the Building Regulations. Objects to the 15% requirement since Part M of the Building Regulations provides guidance on the design of new dwellings to accommodate special needs. The policy replicates other legislation and is contrary to the advice in PPG12. It is unreasonable to expect a blanket formulation designed in a specific manner that is not supported by local needs and the findings of the Housing Needs Assessment.	Delete the Policy and text.	Disagree, it is considered that the % of lifetimes homes required does need to be in a policy as this is not covered by Building Control. Additionally the Housing Needs Survey does justify the figure as it states that 11.1% of the population have special needs and there is some extra to allow for some of the houses to be changing hands.This will be explained with an additional sentence in paragraph 6.45	Amend paragraph 6.45 and add in words 'across all types' in Policy H18
145	H.18		1	Lifetime Homes	The 15% target is an onerous aspiration with significant impact on cost of provision and the density of development, particularly affordable housing. This is not a planning issue and should not be included in the Plan.	Delete the Policy.	The Housing Needs Survey showed 11.1% of all households to contain special needs, it is important to increase the choice of housing available to people with disabilities, it is therefore an important policy.	No change to policy with the addition of the words,"across all types" regarding the 15% target.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	H.18		1	Lifetime Homes	This is a significant requirement in terms of cost especially for brownfield sites which may have high remediation costs.	None specified.	Providing Lifetime Homes does not necessarily involve significant increases in space standards and cost, given the number of households in needs, it is considered that 15% is a fair requirement.	No change except addition of words, 'across all types'
167	H.18		1	Lifetime Homes	Objects because it considers that the requirement of at least 15% is excessive. No justification is given for this figure, and the reference to the HNS 2000 is inappropriate as it is considered to be flawed.	Deletion of this policy.	Disagree the Housing Needs Survey 2000 refers to 11.1% of households in the city with Special Needs. The requirement needs to be higher than this to allow for some spare capacity whilst some properties change hands and some are occupied by people without special needs.	No change except addition of text, 'across all types'.
168	H.18		1	Lifetime Homes	Objects to the policy. The proportion of 15% is unreasonable when taken in combination with the suggested 40% of affordable housing. The 15% threshold is not justified by reference to special needs.	The threshold should be reduced to 5% and the policy made clear that it would apply only to those sites which are centrally located and accessible to public transport, shops and services.	The 15% threshold is justified by the Housing Needs Survey which states that 11.1% of all households contain people with special needs and there will be some spare capacity required on top of this to allow for properties in the process of changing hands.	No change except addition of words, 'across all types'. The policy already refers to suitable sites being those near shops and public transport.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	H.18		1	Lifetime Homes	Not a land use planning matter.	Delete policy.	Disagree the Housing Needs Survey refers to 11.1% of households in the city having someone with special needs, it is considered important to increase the choice of housing available to people with disabilities and therefore a policy is justified.	No change except addition of words, 'across all types' regarding the 15% target
100	H.18	6.43, 6.44, 6.45	3	Lifetime Homes	Support.		Support noted.	No change.
100		6.49	1	Monitoring Indicators for Housing	Welcomes the proposed housing indicators but there is a need to monitor the affordable housing policies of the plan using the other indicators.	Include in the housing indicators the following: the number of affordable units provided; the number of applicants on the Housing Register; the number of households presented as homeless; and, the number of households in temporary accommodation.	Noted, the monitoring indicators for the housing policies will be amended to include more criteria to monitor the affordable housing policies in the plan.	Amend the monitoring indicators in paragraph 6.49
191		6.49	1	Monitoring of Housing Policies	The key issues are insufficient as they do not include any reference to the local housing market e.g. price / rental increases / decreases of housing types etc.	Add to para 6.49 (1) the open market price of housing of different categories and in different locations (2) the open market rental of housing of different categories and in different locations (3) the increase / decrease in the price / rental differentials between different locations / categories of housing".	Noted, it is not possible to include an indicator on the changes in house prices as they are hard to monitor, however, the monitoring indicators will be amended to include more criteria to monitor the affordable housing policies.	Amend the monitoring indicators in paragraph 6.49

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
100			2	New Policy on Supported and Special Housing Needs	Disappointed that the Plan makes no reference to supported/special needs housing. There is a wide range of special needs groups and the Plan should recognise the Supported People Initiative and be integrated in the Gloucestershire Community Care Plan.	Include a policy on supported and special needs housing.	Agreed, there is a wide range of special needs groups and a policy to provide special needs housing would be in accordance with the Council's core policies.	Insert new policy and reasoned justification regarding Supported and Special Needs Housing.

CHAPTER 6 T = TYPE 1 - Objection 2 - Omission 3 - Support

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Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		Proposals Map	1	Proposals Map	<p>The Western Waterfront allocation MU.2 is large enough for the broad disposition of land uses to be shown for individual parts - Cattle Market, Westgate Island, Prison/Quay Frontage, Bakers Quay, Monk Meadow - this would give detail to help assess contribution to housing requirements, and, in the case of the Cattle Market, express a view on how the site should be developed. The broad distribution of uses should also be shown for RAF Quedgeley Site MU.5. There are some inaccuracies in the boundary of MU.5 - some land is included on the southern edge of the Bodiam Avenue site and adjacent to the railway line which is not in QUVL ownership, the latter of which may affect the feasibility of a railway station or rail freight in this location; the playing field north of Naas lane is within the control of QUVL; the land to the west of the A38 should extend further north and</p>	Amend the Proposals Map accordingly.	<p>The allocation of a large site is helpful to allow flexibility for a variety of mixed use schemes to emerge, and it is considered inappropriate to attempt to predict a distribution of uses. The same is true of RAF Quedgeley except for the Rail Freight site which can now be separately allocated. The changes to the site boundary to the RAF Quedgeley site and the Bodiam Avenue commitment should be made.</p>	Amend the boundaries of site MU.5 and HC.11 on the Proposals Map accordingly.

south.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204			2	New housing policy	The level of housing to be provided is only set out in Table 2 and the introductory paragraphs of the housing chapter. Failure to include them within a policy does not give the housing strategy the necessary "Section 54A" weight.	Add a new policy setting out the annualised housing requirement (as required by PPG11), the Council's approach to housing provision and details as to how this provision is to be met.	Agree in part. It is now proposed to include more details of the housing strategy in the New Housing section in line with Planning to Deliver. It is not accepted that a policy setting out the housing target is required as this is included in the adopted Structure Plan which gives the figure Section 54A status. It is not accepted that annualised figures should be included since at a local level completion rates fluctuate significantly and such an approach would only tend to bring pressure for greenfield releases early, compromising the sequential approach.	No change.

CHAPTER 7 - Employment

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		7.4	1	Defence Related Employment	Gloucester does not have a strong tradition of defence related industries	A more accurate summary of the city's employment characteristics.	Agree that more accurate description is needed.	Amend paragraph accordingly
66		7.7	1	EC.1 Waterwells Farm	Land may be needed for junction improvement at roundabout	Reserve land for junction improvement	Disagree. Site already has planning permission	No change
165		7.7	1	New Employment Land	Employment land is defined too narrowly. There is no policy on warehouse clubs. The Chase study recognises that warehouse clubs are suitable for sites that are not appropriate for retail use. Costco is unsuitable for town centre sites; it would not be the optimum use of higher value land. Costco is not open to the public and would not have an impact on the city centre if it was controlled by a S.106 Agreement. It would employ at least 250 people.	Widen employment land to include warehouse clubs, cash and carry, builders merchants, haulage yards, bus garages, MOT testing stations, ancillary car sales. Introduce new criteria policy on warehouse clubs in Employment Chapter	Disagree. The Local Plan must follow the Structure Plan's definition of employment land as comprising B1, B2 and B8 uses. There is insufficient justification to include a specific policy on warehouse clubs.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		7.7	1	Table 4 Employment	The table is incomplete	Need to list all employment land commitments	Disagree. The Local Plan needs to be kept concise and readable. Full information is contained in the city council's Employment Land Position Statement December 2001'	No change
164		7.7, 7.8, 7.9, 7.10	1	New Employment Land	The Plan does not adequately explain how its identified commitments and allocations will compensate for an apparent shortfall below the Structure Plan figure. Check accuracy of figures in Table 5.	Clarify the Plan	Disagree that there is an inadequate explanation. This is included in paragraph 7.10. Agree on need to review Table 5	Table 5 to be reviewed and updated
66		7.7, 7.21	1	Employment Commitment at Hempsted (EC.2)	Employment Commitment at Hempsted. Land strategically reserved for future one mile outer ring road linking Hempsted Lane to future proper SWBP. No permanent buildings south of existing factory interim employment use for about 30 years.	Strategic reservation of land for long term infrastructure.	Disagree. The Local Plan only has a life of 10 years	No change
203		7.7, 7.8, 7.9	1	Employment land Table 5	More people are working from home. This will have a significant impact over the lifetime of the Local Plan.	Table 5 should include a 'working from home' allowance	Disagree. The Structure Plan provision takes into account workforce trends	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139		7.8	1	Table 5	The table under provides for employment land	Increase employment allocations to accord better with the Structure Plan	Agree that there is a need to increase employment allocations. Employment allocations should be increased as a result of reviewing the suitability of sites	Increase number of employment allocations
167		7.8	1	Table 5 Employment	The table gives a misleading picture of employment land supply	Revisions to the table and supporting text	Agree in part. Disagree that the table is misleading, but its figures will be updated	Update Table 5
167		7.9	1	Employment Land	The paragraph is inadequate.	More explanation of which sites contribute to the Structure Plan and the treatment of mixed use sites in the central area	Disagree. Paragraphs 7.8 and 7.9 both refer to the annual position statement on employment land where detailed information can be found. It is our best estimate that the mixed use redevelopment of sites in the central area will have a neutral effect on the supply of employment land. However, we consider that the regeneration of the central area is a priority, even if it should mean the loss of some underused employment land.	No change
167		7.10	1	Employment land	The paragraph is inadequate and misleading. 20 hectares of employment land at RAF Quedgeley is sufficient		Disagree. The justification for 40 ha. is contained in paragraph 7.15	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		7.10	3	New Employment Land	The under provision of employment land is accepted			Note support
66		7.12	1		Long stay car parking may be needed in 100 years time	Allocate sites for interim uses only	Disagree. The Local Plan only has a life of 10 years	No change
163		7.12	1	The Bus Station and Market Parade	The bus station is for out of city buses only; its future use needs a partnership with the operators	Improvement of the bus station needs integration of all city bus services and the railway station	This is covered by policies TR.22 Enhancing the Bus and Rail Interchange and TR.23 Services in the Bus and Rail Interchange	No change
163		7.13	1	Western Waterfront	B1 offices are unsuitable for the Western Waterfront because they are high trip generators without better public transport.	Need to emphasise public transport	Agree that there is a need to emphasise public transport.	Amend Strategy Chapter accordingly
167		7.13	1	Western Waterfront	No information on businesses relocating from the Western Waterfront and new sites to accommodate them - relate this loss of scale of employment uses to the Structure Plan.	Include information on businesses relocating from the Western Waterfront and new sites to accommodate them - relate this loss of scale of employment uses to the Structure Plan.	Disagree. The text explains that we are working with landowners to establish whether they wish to redevelop their land. However, details of potential employment relocations will only be known at the time of planning applications.	No change
163		7.14	1	Strategic Sites - free from contamination	Why do strategic sites need to be free from contamination?	Clarify	The source for this criteria is RPG10 (paragraph 5.16). RPG10 provides more information on the criteria	Identify source of information as RPG10 and add further information on the criteria

CHAPTER 7 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		7.15	1	Employment - Quedgeley	It is too early to say that Waterwells Business Park is successful. Waterwells and other sites form part of the strategic employment location at Quedgeley identified in the Structure Plan. Need to clarify how much of RAF Quedgeley would be B1 uses.	Revise paragraph accordingly	Disagree. The take up of sites shows that Waterwells Business Park is successful. The amount of employment land proposed at RAF Quedgeley for Class B1 uses should not be specified. Specifying an amount would be inflexible and prevent the Local Plan responding to the market.	No change
35	E.1		1	Allocation of site 4 British Energy (MU4) for Mixed Use	Access onto Barnwood Road will lead to more traffic accidents.	Remove allocation.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
51	E.1		1	Allocation of site 4 British Energy (MU4) for Mixed Use	More traffic, noise and pollution on Barnwood Road would not be acceptable.	Use Barnwood By-pass for access	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
65	E.1 (Site 3)		1	Allocation of Site 3 RAF Quedgeley (MU5) for Mixed Use	The impact of the proposal on the Trunk Road network has yet to be established.		This objection has now been withdrawn.	No change
65	E.1 (Site 4)		1	Allocation of site 4 British Energy (MU4) for Mixed Use	The impact of the proposal on the Trunk Road network has yet to be established.		British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
80	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	Increase in traffic on Barnwood Road and Insley Gardens	Remove allocation	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
81	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	Increase in traffic in Insley Gardens	Access for the development should only be from Barnwood Bypass and Barnett Way	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
82	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access is needed. Use pedestrian access to bus routes on Barnwood Road		British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
83	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	Increase in traffic and pollution in Barnwood Road and Insley Gardens. Use access to Sainsbury's	No access onto Barnwood Road	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
84	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access needed. Use existing	No access from Barnwood Road	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
89	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access needed. Proposed access would be dangerous.	No access from Barnwood Road	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
90	E.1		1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access needed	No access from Barnwood Road	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
91	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access needed	No access from Barnwood Road	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
92	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access needed. New access would be dangerous.	No new access from Barnwood Road	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
112	E.1		1	Allocation of site 4 British Energy (MU4) for Mixed Use	Concerned that inadequate car parking will be provided on the site causing off-site parking to the inconvenience of nearby residents.	None given.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
160	E.1		1	Allocation of Site 4 British Energy (MU4) for Mixed Use	Site area is incorrect. Contribution to cost of bus link and services should only be required if development would significantly increase traffic. Need to define bus link and services, or delete reference altogether.	Revise site area . Delete reference to contribution to cost of bus link and services, or justify need for contribution.	British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	E.1		1	E.1 Mixed Use Allocations - Site 2 Western Waterfront and Site 4 British Energy	Westgate Island -mix of uses should include residential. British Energy site - sequential approach applies	Westgate island - include residential use. Need for better public transport	Agree that Westgate Island should include residential as part of the mixed use development. The British Energy site is to be deleted. Public Transport is covered by Policy TR.21 Central Area Public Transport Service	Amend policy accordingly
167	E.1		1	Mixed Use Allocations	Areas of specific sites in the Western Waterfront not shown on the Proposals Map. 40 hectares of employment land is too much at RAF Quedgeley. Proposals Map does not satisfactorily show employment land at RAF Quedgeley. There are no tables for policies E.1, E. 2, and E.3 showing how they meet Structure Plan provision. Their totals don't relate to figures in tables 4 and 5.	Show areas of specific sites in the Western Waterfront on the Proposals Map. 20 hectares of employment land is sufficient at RAF Quedgeley. Show employment land on Proposals Map at RAF Quedgeley. Include tables for policies E.1, E. 2, and E.3 showing how they meet Structure Plan provision. Their totals should relate to figures in tables 4 and 5.	Disagree. Developers would not have flexibility in regenerating the Western Waterfront for mixed use development if specific site boundaries were shown on the proposals map. Agree that there is a need to revise and update the tables. However, the text says that details of employment supply are contained in the Councils annual position statement on employment land.	Revise and update tables

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	E.1		1	Allocation of site 1 The Bus Station (MU3) for Mixed Use	The primary use should be shopping, not offices. The site does not include Market Parade, Northgate Street and Aldate Street	Reallocate as mixed use development primarily for shopping, not offices. Increase size of site so that it includes Market Parade, Northgate Street and Aldate Street. Market Parade, Northgate Street and Aldate Street	Disagree. Blackfriars is more suitable for retail and leisure development. It is the best location to expand the primary shopping area and link together the other key attractions of the centre. The bus station site is more suitable for primarily new offices because of its accessibility by public transport. The site should not be extended because the other land is unavailable and would make a scheme less deliverable	No change
188	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access is needed. Pedestrians can use footpaths from bus routes on Barnwood Road; vehicles can use Barnett Way. Object to new development which would congest Insley Gardens or Barnwood Road.		British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
189	E.1	7.17	1	Allocation of site 4 British Energy (MU4) for Mixed Use	No new access is needed. Pedestrians can use footpaths from bus routes on Barnwood Road; vehicles can use Barnett Way. Object to new development which would congest and pollute Insley Gardens or Barnwood Road. Need to reduce traffic on Barnwood Road/Hucclecote Road.		British Energy have now decided to refurbish their existing building and the mixed use re-development cannot now take place.	Delete allocation MU.4 from Policy E.1
198	E.1		3	Mixed Use Allocations (Site 3)	At least 40 hectares of employment land is needed for a strategic employment site.		Note support	
199	E.1		3	Mixed Use Allocations	Support for the principle of mixed use allocation at Western Waterfront		Note support	
200	E.1		3	Mixed Use Allocations	Support for mixed use development of Western Waterfront.		Note support	
201	E.1		1	Mixed Use Allocations	There is insufficient employment land allocated to meet the Structure Plan provision, as shown in Table 5 of the Local Plan.		Disagree. Paragraph 7.10 of the Local Plan explains that the figures in the Structure Plan are not targets	No change
202	E.1		1	Mixed Use Allocations	There is insufficient employment land allocated to meet the Structure Plan provision, as shown in Table 5 of the Local Plan.		Disagree. Paragraph 7.10 of the Local Plan explains that the figures in the Structure Plan are not targets	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	E.1 (Site 3)		1	Mixed Use Allocations	40 hectares of employment land at RAF Quedgeley is inadequate. The shortfall below the Structure Plan figure may harm the local economy.	Significantly increase employment allocation at RAF Quedgeley; at least so there is no net loss of employment.	Disagree. Consultants for the City Council believe that 40 hectares meets the needs for a strategic employment site	No change
208	E.1		2	Mixed Use Allocations - Non allocation of land east of Waterwells Farm.	Given the existing/proposed developments at Waterwells Farm, RAF Quedgeley and Hunts Grove, this area is a logical and comprehensive addition to those areas. The land has no recognised environmental constraints and, apart from being greenfield, there is no sound planning reason for not extending development up to the railway line which provides a clear physical boundary. The land has the same locational advantages as adjacent sites and would complement them if developed for a mixed use of housing and employment. The loss of a small amount of greenfield is not significant given the advantages of development.	Allocate the site for mixed use development.	Agree that the land is suitable for employment use. However, disagree that it is suitable for housing because it is a greenfield site. The site would be best used as an extension of Waterwells Business Park. Given its proximity to the proposed passenger rail station , the extension should be restricted to B1 uses.	Allocate the site as extension of the Waterwells Business Park for Class B1 uses

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
218	E.1		2	Mixed Use Allocation - land east of Waterwells Business Park	Given the existing/proposed developments at Waterwells Farm, RAF Quedgeley and Hunts Grove, this area is a logical and comprehensive addition to those areas. The land has no recognised environmental constraints and, apart from being greenfield, there is no sound planning reason for not extending development up to the railway line which provides a clear physical boundary. The land has the same locational advantages as adjacent sites and would complement them if developed for a mixed use of housing and employment. The loss of a small amount of greenfield is not significant given the advantages of development.	Allocate the site for mixed use development.	Agree that the land is suitable for employment use. However, disagree that it is suitable for housing because it is a greenfield site. The site would be best used as an extension of Waterwells Business Park. Given its proximity to the proposed passenger rail station, the extension an extension of Waterwells Business Park. Given its proximity to the proposed passenger rail station , the extension should be restricted to B1 uses.	Allocate site as extension of the Waterwells Business Park for B1 uses
164		7.20	1	Locally Significant Site	Spelling mistake	Correct spelling mistake	Agree. The title should read Locally Significant Site	Amend title accordingly

CHAPTER 7 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
132	E.2		1	Employment allocations	Additional land should be made for employment	More employment allocations	Agree. There is suitable land that is available to be allocated for employment use east of Waterwells Business Park and south of the junction of Eastern Avenue and Barnwood Road.	Allocate sites accordingly
167	E.2		1	Employment Allocations	There is no reference to land east of Waterwells Park. No explanation between the difference between the sum of sites in Policy E.2 and that of Table 5.	Allocate site east of Waterwells Park. Explain difference between figures in Policy E.2 and Table 5, or include net total of 5.44 in Policy E.2	Agree. Figures in the table and text have been revised and updated. Land east of Waterwells Business Park is to be allocated	Amend Local Plan accordingly
201	E.2		1	Employment Allocations	There is insufficient employment land allocated to meet the Structure Plan provision, as shown in Table 5 of the Local Plan.		Agree. However, Paragraph 7.10 of the Local Plan explains that the figures in the Structure Plan are not targets.	No change
202	E.2		1	Employment Allocations. RMC site, Waterwells Farm	The use should not be restricted to B1, but should provide a range of employment opportunities	Amend allocation so that it includes B1 ,B2, and B8 uses. Phasing of the site with transport infrastructure improvements is unnecessary and unjustified because the potential expansion of Waterwells Park has already been taken into account. The site specific obligations should specify that they will reasonably and fairly relate to the development proposed.	Disagree. The RMC site is allocated as an extension of Waterwells Business Park which has planning permission for Class B1 uses only.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
77	E.2		1	Employment Allocations Site 1 Long stay car park, railway station	The land is needed for car parking	Keep land for car parking	Disagree. Paragraph 7.18 explains that part of the land would be kept as a car park for rail users, but that there is an opportunity to use the rest of it for an office development.	No change
65	E.2		1	Employment Allocations Site 2 RMC, Waterwells Farm	The impact of the proposal on the Trunk Road network has yet to be established.		This objection has now been withdrawn.	No change
47	E.2		1	Employment Allocations Site 3 Junction of Barnwood Road and Bypass	No increase in traffic onto Barnwood Road	Any traffic to go onto the Bypass	Disagree. For highway safety reasons, the access would need to be from Barnwood Road. Any application would need to have a Transport Assessment.	No change
51	E.2		1	Employment Allocations Site 3 Junction of Barnwood Road and Bypass	More traffic, noise and pollution on Barnwood Road would not be acceptable.	Use Barnwood By-pass for access	Disagree. For highway safety reasons, the access would need to be from Barnwood Road. Any application would need to have a Transport Assessment.	No change
66	E.2		1	Employment Allocations Site 3 Junction of Barnwood Road and Bypass	Request junction improvements at roundabout.	Request junction improvements at roundabout.	Disagree. Any transport improvements would relate to the Transport Assessment submitted with an application	No change

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
156	E.2	7.2	1	Employment Allocations Site 3 Junction of Barnwood Road and Bypass	The policy is unnecessarily restrictive; the site is suitable for a number of different uses; access could also be from the bypass. Retaining the post office is irrelevant. Site should also include the former playing fields.	Replace policy with more flexible criteria policy	Agree in part. The site could accommodate a mixed use development comprising a B1 office, local shops and some housing. The playing fields meet a local need. Access needs to be restricted to Barnwood Road for highway safety reasons.	Amend policy accordingly
164	E.2		1	Employment Allocations Site 3 Junction of Barnwood Road and Bypass	The site includes a petrol filling station. The site obligations should include a requirement to decontaminate the site.		Agree	Amend policy accordingly
190	E.2		1	Employment Allocations Site 3 Junction of Barnwood Road and Bypass	Object to increase in traffic onto Barnwood Road. Loss of view may devalue home. Retain mature trees	Remove allocation	Disagree in part. For highway safety reasons, the access would need to be from Barnwood Road. Any application would need to have a Transport Assessment. Devaluation of properties is not a planning matter. Agree that the important trees on the site should be protected.	Add site specific obligation on protecting important trees
14	E.2		3	Employment Allocations Site 3 Junction of Barnwood Road and By-pass	We operate the petrol filling station and car wash. The allocation would enable us to relocate and improve our facility. The relocation could lead to a better redevelopment of the whole site.		Note support	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	E.2		2	Employment allocations. Allocate site south east of Waterwells Farm	Allocate site south east of Waterwells Farm	Allocate site south east of Waterwells Farm	Agree that the land is suitable for employment use.	Allocates site for Class B1 use
167	E.2		1	Employment Allocation East of Waterwells Farm	Land east of Waterwells Farm is not allocated for employment.	Allocate land east of Waterwells Farm for employment.	Agree.	Allocate site for Class B1 employment
198	E.2		2	Employment Allocations	Land east of Waterwells Park should be allocated for employment use	Allocate land east of Waterwells Park for employment use		
202	E.2		2	Employment Allocation - land south east of Waterwells Business Park	The land south east of Waterwells Business Park is not allocated for employment use. It would help meet the shortfall of employment land and expand the business park.			
202	E.2		1	Employment Allocations	There is insufficient employment land allocated to meet the Structure Plan provision, as shown in Table 5 of the Local Plan.			
203	E.2		2	Allocation for employment use - land to the east of Waterwells Farm	Allocate land to the east of Waterwells Farm		Agree. Allocate site for Class B1 employment use	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
208	E.2		2	Employment Allocations	Land east of Waterwells Business Park is not allocated. The site would extend the business park; and has no nature, landscape or recreational value. Its employment value outweighs the loss of a small piece of greenfield land.	Allocate land east of Waterwells Business Park.	Agree.	Allocate the site for Class B1 employment use
218	E.2		2	Employment Allocations - land east of Waterwells Business Park	The site would extend Waterwells Business Park. It has no nature, landscape or recreational value. It would add to the quality and range of employment allocations.	Allocate the land east of Waterwells Business Park for employment use.	Agree.	Allocate the site for Class B1 employment use
100	E.3	7.22, 7.23	1	Allocations for employment on old employment sites	Priority needs to be given to housing which meets affordable housing needs in re-using old employment sites.	Reword so priority is given to housing which meets affordable housing needs in re-using old employment sites.	Disagree. Many old employment sites are unsuitable for housing. Where housing is proposed, the provision for affordable housing will be assessed against the relevant policies in the Local Plan.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	E.3		1	Allocations for Employment on Old Employment Sites	Need to ensure that any allocations in this plan do not conflict with any allocations made in the Waste Local Plan. B1 office use is a high trip generator which requires good bus links to the majority of its catchment area (RPG).	Emphasize need for much better public transport.	Agree that there is a need to emphasise public transport.	Amend Strategy Chapter accordingly
204	E.3		1	Allocations for employment on old employment sites	The sites in Policy E.3 are unsuitable for employment. They should be considered for mixed use or housing.	Delete Policy E.3. The sites in Policy E.3 should be identified as priority sites for regeneration for mixed use or housing, in partnership with the RDA using CPO powers if necessary.	Disagree. Paragraph 7.23 of the Local Plan explains that the sites are suitable for employment uses and not housing; and that it would be up to the developer to demonstrate the merits of alternative uses	No change
209	E.3		1	Allocations for Employment on Old Employment Sites	As the sites in Policy E.3 are unlikely to be developed for employment uses, the shortfall in supply below the Structure Plan figure is bigger than the Local Plan expects.	If the sites in Policy E.3 are to be developed for alternative high value uses, then the developers should be required to provide other sites for employment use or funds to build small business units. Include a permissive policy supporting the provision of employment on land not allocated for a particular use; actively encourage a high employment element in mixed use developments.	Disagree. It would be unreasonable to require a developer to do this. Such a permissive policy would not balance the support for employment uses against the need for other uses.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
169	E.3		1	Allocations for Employment on Old Employment Sites - Site 1 British Gas Bristol Road	No alternative range of uses is identified. The site will not be developed for employment use because of its contamination. A high value use is needed.	The British Gas site should be identified for comprehensive mixed use development comprising a foodstore, high density housing and some employment uses.	Disagree. The Local Plan Strategy gives priority to sites for high value uses that would regenerate the central area. However, paragraph 7.22 should be amended to explain why the allocations in this policy are unsuitable for housing.	Amend paragraph 7.22 accordingly
154	E.3	7.23	1	Allocations for employment on old employment sites Site 4 railway sidings, Horton Road	The site is close to the hospital and a B2 use could cause problems of noise, vibration, smell etc.	The policy and text should refer to the need for employment uses and the traffic they generate not to adversely affect the hospital.	Agree.	Amend policy and text accordingly
159	E.3	7.22	1	Allocations for Employment on Old Employment Sites - site 2 Railway Triangle	The site is suitable for alternative uses - retailing, cash and carry, trade park, car dealerships	The policy is amended to include alternative uses - retailing, cash and carry, trade park, car dealerships	Disagree. There is inadequate justification for allocating the site for specific alternative uses. The use of the site for retailing would conflict with the Local Plan Strategy of prioritizing the central area for high value uses like retailing.	No change
211	E.3	7.23	1	Allocation for Employment on Old Employment Sites - Railway Triangle	The site is unlikely to be developed for employment uses, and should be allocated for alternative uses to overcome its constraints.	Allocate the site for employment, retail - limited so there would be no unacceptable impact on Blackfriars, cash and carry, trade centre or car dealership use/ car showroom	Disagree. There is inadequate justification for allocating the site for specific alternative uses. The use of the site for retailing would conflict with the Local Plan Strategy of prioritizing the central area for high value uses like retailing.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
154	E.3	7.23	1	Allocations for employment on old employment sites. Site 3 Railway sidings, Great Western Road	The site is close to the hospital and a B2 use could cause problems of noise, vibration, smell etc.	The policy and text should refer to the need for employment uses and the traffic generated not to adversely affect the hospital.	Agree.	Amend policy and text accordingly
159	E.3		1	Allocations for Employment on Old Employment Sites - Site 4. Railway Sidings, Horton Road	Proposed use should also include B8 uses	Policy should be amended to include B8 uses	Disagree. The land is close to the hospital and Class B2 and Class B8 uses could cause problems of noise and disturbance. The Local Plan should be amended so that the site is restricted to Class B1 uses only	Amend policy and text accordingly
66	E.3		1	Site 2 Railway Triangle, Site 3 Railway Sidings, Great Western Road, Site 4 Railway Sidings, Horton Road	Reserve land for long stay car parks	Allocate for interim uses only	Disagree. The Local Plan only has a life of 10 years	No change
2		7.24	1		The reasoning for Policy E.4 is likely to stifle new investment, leading to a decline in the local economy.	Replacement paragraph that justifies replacement Policy E.4.	Agree in part. The text should be revised so that it refers to the Chesterton study on the quality of employment land.	Amend text accordingly

Ref No	PoI No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
196	E.4	7.24	1	Protecting Employment Land	Health care or community facilities are appropriate on employment land because they provide employment and serve the local community. Land designated for high value uses is often too expensive for health care facilities.	Add paragraph which supports health care and community facilities on employment land	Disagree. The Local Plan must follow the Structure Plan's definition of employment land as comprising B1, B2 and B8 uses. Policy E.4 would permit the loss of certain employment land if the alternative use would offer greater potential benefit to the community. It will be up to the developer to demonstrate that a particular health care facility would offer greater benefit on a particular site.	No change
2	E.4		1	Protecting Employment Land	The policy is negative, unreasonable, unclear and imprecise. It focuses on retaining employment land instead of protecting and generating new jobs.	Replacement policy that would encourage new investment, retain jobs, embrace change, protect the environment and ensure developments are accessible.	Disagree. The policy is intentionally negative since the issue Gloucester faces is the continued threat to employment land from other uses. The policy does not specify the type of alternative uses that would be acceptable so as to give developers flexibility.	No change
100	E.4	7.24	1	Protecting Employment Land	Priority needs to be given to housing which meets affordable housing needs in re-using old employment sites.	Reword so priority is given to housing which meets affordable housing needs in re-using old employment sites.	Disagree. Many old employment sites are unsuitable for housing. Where housing is proposed, the provision for affordable housing will be assessed against the relevant policies in the Local Plan.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
115	E.4		1	Protecting Employment Land	Employment land should only be protected if there is a shortage.	Policy should refer to the effect of adversely limiting the range and quality of employment sites.	Agree in part. The text justifying the policy explains that we don't want to lose existing employment land where it is not needed for the local economy. However, the text should also refer to the Chesterton study on the quality of employment land.	Amend text accordingly
136	E.4	7.24	1	Protecting Employment Land	Employment land should include all employment generating uses, including sui generis uses	Policy should be reworded to include all employment generating uses, including sui generis uses	Disagree. Paragraph 7.7 explains that the Structure Plan only counts Class B1, B2 and B8 uses as employment land	No change
163	E.4		1	Protecting Employment Land	B1 uses require good bus links	Need for better public transport	The need for better public transport facilities should be included as a Key Development Priority in the Strategy Chapter	Amend Strategy Chapter accordingly
167	E.4		1	Protecting Employment Land	The policy is inconsistent with the Structure Plan (paragraph 7.2.2)	Delete policy	Disagree. It is unclear what the objection refers to.	No change
168	E.4		1	Protecting Employment Land	The policy does not provide for the redevelopment of existing employment land where the criteria are met. There is no criterion on the range and supply of employment land.	Revise policy so that it provides for the redevelopment of existing employment land where the criteria are met, and so there is a criterion on the range and supply of employment land.		

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
166	E.4		3	Protecting Employment Land	A waste management facility would generate employment.		This site is not an allocation. It already has planning permission for employment use Note support	No change
171	E.4		3	Protecting Employment Land	The policy supports the promotion of investment to improve the local economy in a sustainable way. The whole Birds Eye Walls site remains potentially suitable for employment use. Policy E.4 would allow for the expansion of businesses like Birds Eye Walls.			
209			2	New policy on employment provision on unallocated sites	In view of the amount of employment land likely to come forward the Council may wish to include a permissive policy, supporting the provision of employment on land not allocated for a particular use and actively encouraging a high employment element in any future mixed use development proposals.		Disagree. The issue Gloucester faces is the continued threat to existing employment land from other uses. If sites become available for redevelopment, then their suitability for employment would have to be weighed against that of other uses like housing.	No change

CHAPTER 8 - Shopping

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
164		8.1 8.2 8.3	1	Introduction - Objectives for retail shopping	The introduction should include a clear statement of intent regarding the overall retail objectives. The Rural White Paper (Chapter 8) encourages the use of regional and speciality foods.	The introduction should cover: sustaining and enhancing the vitality and viability of town centres; focussing development, especially retail development, in places that increase competition and maximise the chance to use means of transport other than the car; maintaining an efficient retail sector, ensuring the availability of a wide range of shops, employment, services and facilities to which people have easy access by a choice of means of transport. The chapter should explicitly support initiatives like farmers' markets, and local and farm shops.	Agree that there should be a statement covering overall retail objectives. Disagree that we need to refer to regional and speciality foods because the Local Plan cannot control the source or specific type of foods	Amend introduction accordingly and delete paragraph 8.3
52		8.3	1	Introduction to Shopping	The type of goods sold in district centres should refer to convenience goods, as well as comparison goods.	Delete second sentence. Refer to the need for designated centres of appropriate size and in appropriate locations.	Paragraph 8.3 is to be deleted in response to another objection.	No change
217		8.3	1	Retail policies	There is no reference to the role of mixed use sites and the Western Waterfront in accommodating retail development.	Direct reference should be made to the role of mixed use sites and the Western Waterfront in accommodating retail development.	Agree.	Introduce reference to Western Waterfront in paragraph 8.2

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
52		8.4	1	Hierarchy and role of designated centres.	It is inappropriate to generalise about the effects of retail warehouse parks. For example, the Peel Centre is centrally located.	Delete the final two sentences. Refer to out of centre retail warehouse parks and food superstores complementing designated centres.	Disagree in part. PPG6 does not support out of centre developments. However, no quantitative assessment has been done on the impact of developments like Eastern Avenue on the city centre after they have been trading. The examples should therefore be removed.	Delete reference to examples.
115		8.4	1	Hierarchy and role of designated centres.	The paragraph implies that all out of centre retail development is undesirable. This is inconsistent with PPG6	Delete last two sentences from paragraph 8.4. Replace them with reference to sustaining the hierarchy and role of designated centres	Disagree in part. PPG6 does not support out of centre developments. However, no quantitative assessment has been done on the impact of developments like Eastern Avenue on the city centre after they have been trading. The examples should therefore be removed.	Delete reference to examples.
217		8.4	1	Hierarchy and role of designated centres.	The final sentence cannot be justified.	Delete final sentence	Accept in part. No quantitative assessment has been done on the impact of developments like Eastern Avenue on the city centre after they have been trading. However, out of centre locations are a last resort for new retail development.	Delete reference to examples.
52	S.1		1	Designated Centres	There are no tests to determine how designated centres could be undermined.	Either delete S.1 or add explanatory text as set out in paragraph 4.3 of PPG6.	Agree.	Delete Policy S.1 Introduce new criteria policy on out of centre developments

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
168	S.1		1	Designated Centres	Government policy says nothing about maintaining a shopping hierarchy or precluding new centres.	Replace Policy S.1 with two criteria - based policies - one for development in existing centres, one for edge or out of centre development covering need, sequential approach, retail impact and accessibility	Disagree in part. PPG6 (paragraph 1.5) refers to a hierarchy of centres. However, agree that there is a need for a policy on out of centre developments	Delete Policy S.1 Introduce new criteria policy on out of centre developments
52		8.5	1		The Primary Shopping Area is too wide ranging. It needs to be smaller so that the wider city centre can meet all appropriate non-retail needs.	Amend extent of Primary Shopping Area so that it reflects Annex B of PPG6	Disagree. The Primary Shopping Area is an appropriate size.	No change.
199		Glossary	1	City Centre Definition	The definition does not accord with that provided in PPG6.	Amend the definition to match the PPG6 definition.	Disagree. Annex A of PPG6 refers to edge of centre locations as being within easy walking distance of the Primary Shopping Area	No change
199		8.5	1	Primary Shopping Area	Annex A and Section 2 of PPG6 advise that a city centre is the area that comprises a broad range of facilities and services and fulfils a function for both the community and for the public.	Amend the city centre boundary in accordance with PPG6. The Interim Adoption Local Plan boundary of the city centre should be retained.	Disagree. The Primary Shopping Area is the city centre for retail purposes. However, introduce a defintion of the central area in the glossary that explains that there is no definite boundary of the city centre for other uses.	Amend glossary accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
217		8.5	1	Primary Shopping Area	To draw the city centre boundary around the Primary Shopping Area is unacceptable and inappropriate. It conflicts with the advice in PPG6 that town centres comprise a broad range of facilities. Consequently, the area excludes attractions like the cathedral, allocations like the bus station and the Western Waterfront.	Redraw city centre boundary so that it reflects the full range of activities that make up and support the city centre. The boundary used in the 1996 Interim Adoption Local Plan would be appropriate.	Disagree. The Primary Shopping Area is the city centre for retail purposes	
95		8.5	2	New criteria policy on new retail floorspace	There is no criteria policy on new retail floorspace. The Local Plan does not therefore conform to PPG6.	Include a new criteria policy on new retail floorspace that covers need, the sequential approach, vitality and viability and accessibility.	Agree	Introduce new policy
101		8.5	2	New criteria policy on new retail floorspace	There is no criteria policy on new retail floorspace. The Local Plan does not therefore conform to PPG6.	Include a new criteria policy on new retail floorspace that covers need, the sequential approach, vitality and viability and accessibility.	Agree	Introduce new policy
115		8.5	2	New criteria policy on new retail floorspace	There is no policy framework for determining the suitability of retail proposals besides those on allocated sites. There is a quantitative and qualitative need for new retail warehouse provision over the local plan period. The Local Plan should recognise the benefits of locating new retail development within or adjoining existing out of centre developments	Add a new criteria policy on new retail floorspace that covers need, the sequential , vitality and viability, impact and accessibility by public transport. New supporting text should refer to the role of out of centre locations	Agree that there is a need for a new policy. Disagree that there is an unmet need for further retail warehouse provision. Government policy is to sustain and enhance designated centres, not to strengthen out of centre developments.	Introduce new criteria policy on out of centre developments

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
119		8.5	2	New criteria policy on new retail floorspace	The Local Plan does not include a criteria policy on new retail floorspace for after the Local Plan has been adopted, as advised in paragraph 1.14 of PPG6.	Include a new criteria policy on new retail floorspace that covers the sequential approach, vitality and viability, accessibility by public transport.	Agree	Introduce new criteria policy on out of centre developments
137		8.5	2	New criteria policy on new retail floorspace	There is no criteria policy on new retail floorspace. This is needed for sites that become available after the Local Plan has been adopted. It would help simplify the Local Plan and provide flexibility.	Include a criteria policy on new retail floorspace.	Agree	Introduce new criteria policy on out of centre developments
164		8.8	1	Blackfriars	The size of the department store should be in square metres.	The size of the department store should be in square metres.	Agree.	Amend text accordingly
137	S.2	8.9,8.10	1	Blackfriars	There are no other allocations for high order comparison goods besides Blackfriars. High order goods need defining. A quantitative and qualitative need for comparison goods retailing may exist. Any harm to the Blackfriars scheme should be assessed when other applications are made. Proposals should be treated on their own merits.	Replace paragraph 8.10. New paragraph should judge applications for comparison goods shopping on their merits; they will be required to demonstrate that they will not jeopardise Blackfriars or the retail hierarchy.	Disagree in part. Agree on need for a new policy. Reference to high order goods is to be deleted.	Introduce new criteria policy on out of centre developments. Remove reference to high order goods.

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
159	S.2	8.9 8.10	1	Blackfriars - High order comparison goods	Notwithstanding the advice from Chase and Partners, a qualitative need for comparison goods may exist. All proposals should be judged on their own merits. Any harm to retail provision should be assessed at the time of the application.	Replace paragraph 8.10 with reference to judging applications on their merits; applications will be required to demonstrate that they will not jeopardise Blackfriars or the retail hierarchy. High order goods should be defined, or the reference deleted.	Agree on need for a new policy and that reference to high order goods should be deleted.	Introduce new criteria policy on out of centre developments. Delete reference to high order goods.
168	S.2		1	Blackfriars (MU.1)	The site is not suitable for major comparison retail development for high order goods - it would harm the conservation area.	Delete allocation.	Disagree. Blackfriars is suitable for retail and leisure development . It is the best location to expand the Primary Shopping Area and link together the other key attractions of the centre. The scheme would not harm the conservation area provided that the design is appropriate.	No change
193	S.2		1	Allocations of Blackfriars for retail development.	Cannot understand the emphasis on Blackfriars when the central area is in a terrible state of decline. The emphasis must be on regenerating the centre and cleaning it up. Furthermore there should be some limited free parking in the centre like Cheltenham.	Halt plan for Blackfriars and concentrate on the historic city centre to complement the Cathedral. Provide limited free parking.	Disagree. Blackfriars remains the priority location for expanding the Primary Shopping Area	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
207	S.2	8.9, 8.10	1	Blackfriars	There are no other allocations for high order comparison goods besides Blackfriars. High order goods need defining. A quantitative and qualitative need for comparison goods retailing may exist. Any harm to the Blackfriars scheme should be assessed when other applications are made. Proposals should be treated on their own merits.	Replace paragraph 8.10. New paragraph should judge applications for comparison goods shopping on their merits; they will be required to demonstrate that they will not jeopardise Blackfriars or the retail hierarchy.	Disagree in part. Agree on need for a new policy. Reference to high order goods is to be deleted.	Introduce new criteria policy on out of centre developments. Remove reference to high order goods.
211		8.10	1	Blackfriars	There are no other allocations for high order comparison goods besides Blackfriars. High order goods need defining. A quantitative and qualitative need for comparison goods retailing may exist. Any harm to the Blackfriars scheme should be assessed when other applications are made. Proposals should be treated on their own merits.	Replace paragraph 8.10. New paragraph should judge applications for comparison goods shopping on their merits; they will be required to demonstrate that they will not jeopardise Blackfriars or the retail hierarchy.	Disagree in part. Agree on need for a new policy. Reference to high order goods is to be deleted.	Introduce new criteria policy on out of centre developments. Remove reference to high order goods.
50	S.3		1	Kings Square	The policy would not increase security and attract new shops.	Kings Square should be redeveloped as an enclosed shopping centre. This would increase security and attract new shops.	Disagree. Kings Square is an important public open space.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
164	S.3		1	Kings Square	It is unclear what is meant by 'limited' development.	The policy should clarify what scale of development is expected	Agree in part, but this will need to be assessed at the time of a planning application for Kings Square. However, the reference to limited development should be deleted. Instead, the policy should require the developer to demonstrate that there would be no unacceptable impact on any scheme in the Blackfriars area	Amend policy accordingly
168	S.3		1	Kings Square	This site is more sustainable and offers more potential than Blackfriars.	Allocate this site for major comparison retail for high order goods.	Disagree. Blackfriars is suitable for retail and leisure development provided the design is appropriate. It is the best location to expand the primary shopping area and link together the other key attractions of the centre. Kings Square is an important public open space	No change
184	S.3		1	Kings Square	Kings Square is surrounded by shops - there is no need for more.	Delete policy.	Disagree. Only limited shopping is proposed. This is necessary to help fund environmental improvements to Kings Square	No change
164	S.4		1	The Bus Station Site (MU.3)	It is unclear what scale of retail is envisaged to prevent any unacceptable impact on Blackfriars and the Primary Shopping Area.	The policy should clarify the scale of retailing	Agree in part, but this will need to be assessed at the time of a planning application for the bus station site	Delete relevant sentence. Replace by one that requires the developer to demonstrate that there would be no unacceptable impact on Blackfriars

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
168	S.4		1	The Bus Station Site (MU.3)	This site is more sustainable and offers more potential than Blackfriars.	Allocate this site for major comparison retail for high order goods.	Disagree. Blackfriars is more suitable for retail and leisure development. The redevelopment of the bus station is more suitable for offices	No change
141	S.4		3	The Bus Station Site (MU.3)	Support for the retention of the bus station.		Note support	No change
163	S.5		1	Cattle Market Site	Site specific obligations exclude transport requirements.	Site specific obligations to include transport requirements.	Disagree.	
164	S.5		1	Cattle Market Site	The site is out of centre, but the Local Plan does not adequately set out whether a sequential approach has been applied in selecting a site for a retail warehouse.	The Local Plan should clarify the sequential approach in selecting the site for a retail warehouse	Agree.	Amend text accordingly
168	S.5		1	Cattle Market Site	There is no quantitative or qualitative need for further bulky goods retail warehousing. A B&Q warehouse would have an adverse impact on the city centre - see Sunbury case. There is inadequate regard to the sequential approach - it should be based on the type of goods sold, not on the format. The development is only being promoted because of the capital receipts the Council could spend elsewhere - this is neither lawful nor appropriate.	Delete the policy.	Disagree. The planning case for a B&Q Warehouse has been accepted by the City Council, based on the report by Chase and Partners	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
217	S.5	8.15	1	Cattle Market Site	Chase and Partners' study and the planning permission for the Cattle Market both include a wider range of acceptable goods than stated in Policy S.5. The text should refer to the proper sequential approach carried out in selecting the Cattle Market site in the Chase study and the Council's review of the planning application. Apart from 'controlling the range of goods', the site specific obligations are unjustified by a DIY warehouse alone; rather they relate to the mixed use planning application.	Paragraph 8.15 should make full reference to the findings of the Chase study. Policy S.5 should refer to the full range of uses found acceptable, and also delete the obligations that have no relationship to the retail development.	Agree in part. Agree that the policy should refer to the other types of retail uses that are considered acceptable. Rather than deleting the obligations that do not relate to the retail development, it is more appropriate to amend the policy so that it refers to the mixed use development of the site.	Amend text and policy accordingly
199	S.5		3	Cattle Market Site	Support in principle as part of the mixed use development on the Western Waterfront		Note support	No change
52	S.6	8.16	1	Monk Meadow	There is no evidence of a robust sequential assessment of the selection of the site for a food superstore.	Delete paragraph. Carry out a full sequential assessment of sites for food superstores and include this in the Local Plan.	Agree in part, but text only needs amending so that it covers the sequential approach.	Amend paragraph accordingly as part of new policy on Baker's Quay, Monk Meadow and Llanthony Priory.
163	S.6		1	Monk Meadow	The site specific obligations of Policy S.6 exclude a Transport Assessment. The South West Bypass and IRR should be completed before the development begins trading.	The site specific obligations of Policy S.6 should include a Transport Assessment	Disagree. Paragraph 2.30 of the Strategy Chapter refers to contributions to infrastructure improvements on the Western Waterfront	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
164	S.6		1	Monk Meadow	It is unclear what scale of retail use is envisaged to safeguard the implementation of the Blackfriars scheme.	Clarify the scale of retail use that is envisaged.	Agree in part, but this will need to be assessed at the time of the mixed use planning application for 'Gloucester Quays'	Amend text accordingly
168	S.6		1	Monk Meadow	A foodstore at Monk Meadow would not provide a qualitative need; BT's site at Hempsted is better suited.	Delete allocation at Monk Meadow; allocate BT site at Hempsted	Disagree. BT's site is not part of the Western Waterfront. A food superstore on the BT site would be dependent on car borne customers.	No change
169	S.6		1	Monk Meadow	This site is no better than the British Gas site, and is cut off from the city centre by the canal. It needs highway improvements; it is in the floodplain. Its deliverability is questionable. The British Gas site is readily available; a foodstore would overcome the contamination constraint.	Replace allocation for food superstore at Monk Meadow with an allocation at the British Gas site, Bristol Road	Disagree. The British Gas site is not part of the Western Waterfront. A food superstore on the British gas site would be dependent on car borne customers	No change
213	S.6		1	Monk Meadow	Need for the foodstore has not been demonstrated. The sequential approach has not been properly applied.	Replace with new policy : planning permission will only be granted if need has been demonstrated and the sequential approach properly applied.	Agree in part. Need to explain more fully the need for the foodstore and the application of the sequential approach	Amend text accordingly
153	S.6		3	Monk Meadow	Support from Wm. Morrison Supermarkets plc for the allocation of a new foodstore at Monk Meadow.		Note support	No change
199	S.6		3	Monk Meadow	Support in principle as part of the mixed use development on the Western Waterfront.		Note support	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
200	S.6		3	Monk Meadow	This policy is fully supported, and will help realise the redevelopment of the Western Waterfront		Note support	No change
163	S.7		1	Westgate Island	Access is a serious problem, particularly for non-car users. Residential is not one of the proposed uses.	Need to emphasise problem of all forms of access. Identify need for realistic Travel Plans and very high contributions to bus provision and enhancement in the policy	Agree that residential should be included. The Travel Chapter includes a policy on travel plans. Transport related obligations are covered by Policy CL.2 in the Commercial Leisure Chapter	Amend policy accordingly
184	S.7		1	Westgate Island	There should be no multi storey car park; it would spoil the look of the site and the almshouses.	Car parking must be reduced.	Disagree. A multi storey car park could be located and designed so tha tit would not spoil the look of the site and the almshouses.	No change
213	S.7		1	Westgate Island	Object to the designation of the site for offices and limited comparison retailing. No evidence in the Local Plan that qualifies there is a demand for B1 office development. The site is an existing retail location and will be a more desirable location for further retail development and has the ability to accommodate large scale comparison retailing together with leisure uses and customer car parking.	The site should be allocated for further comparison retailing where it can be demonstrated that it will not have an unacceptable impact on the Blackfriars scheme or city centre as a whole. The provision of office space should be deleted.	Disagree in part. Removing the gyratory would make the site more accessible and more attractive for offices, as part of a mixed use development. Agree that comparison retailing could be permitted if its scale and the identity of the traders could be controlled so that there was no unacceptable because it would have an unacceptable impact on a scheme in the Blackfriars location and on the Primary Shopping Area	Amend policy accordingly
164	S.8		1	Changes of Use in the Primary Shopping Area	There is no justification for the period of one year in criteria 3	Justify the period of one year in criteria 3	Agree. Replace 'one year' with a 'reasonable period of time'.	Amend policy accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
139	S.9		1	New District and Local Centres	The policy will attract more people to out of centre locations. The Local Plan should only identify new district and local centres where there is a need for such facilities.	Delete first paragraph of policy.	Agree in part. Reference to middle and low order goods is to be deleted. However, more district and local centres are to be supported: they are mixed use developments, accessible by a choice of means of transport and include uses whose scale and type serve the catchment area of the centre. If a new development does not meet these tests, it is not a district or local centre	Amend polciy accordingly
160	S.9		1	New District and Local Centres	Wording of the policy does not refer to the adverse effect on the Central Area or nearby district or local centres.	Delete reference to performing the role of a local or district centre. Refer to no adverse effect on the vitality and viability of nearby district or local centres.	Agree in part. Agree that the location of new district or local centres could have an unacceptable impact on existing ones but disagree that such new development should not also perform the role of district or local centres	Amend policy and text accordingly
52	S.9	8.19 and 8.20	3	New District and Local Centres	In addition to Policy S. 9, the Local Plan should assess whether there are suitable locations to designate now as new local or district centres.		Note support. The Local Plan has identified RAF Quedgley as a potential location for a new local centre. However, the text should make it clear that there are no other suitable sites that are available	Amend text accordingly
167	S.9		3	New District and Local Centres	The development of RAF Quedgeley would provide for a local centre.		Support noted.	No change

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
150	S.9		2	New district and local centres. New local centre at Eastern Avenue	There is a need to identify new local centres. The site south of Apollo 200 on Eastern Avenue is suitable for a local centre. It is close to housing, retailing and community facilities, and is accessible by a choice of transport.	Identify the site as a new local centre in Policy S.9.	Disagree. The proposed site would not perform the role of a local centre: it is not easily accessible buy cycling and walking. Clarify text so that it refers to the lack of suitable sites currently available for local centres.	Amend text accordingly
52	S.10	8.21	1	Comparison Goods in District Centres	It is unrealistic and inappropriate to seek to permit only the sale of lower order comparison goods in district centres. It is only for out of centre developments that PPG6 advocates limiting the range of goods sold. The proper approach is to ensure that district centres are designated in appropriate places where they are most likely to attract retailers that will provide the suggested type of facilities. See Annex B of PPG6.	Delete references to comparison goods and low order comparison goods in Policy S.10. Delete paragraph 8.21 and refer to general statement on designating district centres where they will attract retailers.	Agree in part. Reference to low order goods is to be deleted. Disagree. Attracting retailers is important, but it is not the proper test for designating district centres. The policy should also refer to the sale of middle order goods in district centres. Policy S.9 encourages the development of new district centres.	Amend policy accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
139	S.10		1	Comparison Goods in District Centres	Given the large size of the Matalan store, similar sized new retail development would be of a scale inconsistent with a district centre. Policy S.10 refers to 'low order comparison goods'; the glossary definition of district centres refers to 'middle order non bulky comparison goods'. It is unclear how low order comparison goods could be controlled and conditions on planning permissions be justified. The district centre boundary is poorly identified; it excludes community facilities like the library, village hall and the public house.	Redefine the district centre boundary. Clarify the types of comparison goods appropriate to the district centre.	Agree on need to widen the boundary of Quedgeley District Centre. Reference to low order and middle order goods is to be deleted.	Redraw the boundary of Quedgeley District Centre on the Proposals Map. Remove reference to high order goods.
163	S.10		1	Comparison Goods in District Centres	Policy S.10 does not include a requirement for Transport Assessments for district centre shopping.	Policy S.10 should include a requirement for Transport Assessments for district centre shopping.	Disagree. The policy does not make a specific allocation for new development in a district centre. The scale of any planning application will determine whether a Transport Assessment has to be made.	No change
164	S.10		1	Comparison Goods in District Centres	There is no explanation of 'low order goods'	There should be an explanation of 'low order goods' (PPG12)	Reference to low order goods is to be deleted	Amend policy accordingly

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
42	S.11		1	Extensions to Quedgeley District Centre	Development would increase noise pollution and increase traffic to the danger of local children; mature trees provide habitat to the red squirrel, trees should not be cut down; the site is not brownfield land that has been used before; additional shops should be incorporated in RAF Quedgeley development instead.	Remove allocation. Site should be bought from developers and used as public open space.	Planning permission has now been granted for a discount foodstore. However, the important trees are protected by Tree Preservation Orders	Delete policy and text
52	S.11	8.22	1	Extensions to Quedgeley District Centre	The text does not explain the qualitative and quantitative need for further discount foodstores. The Local Plan should not suggest that they are unacceptable within local centres. No thorough sequential approach appears to have been carried out in supporting the proposed discount foodstore on land adjoining Highliffe Farm.	Delete all text after second paragraph. Refer to general statement on the provision of foodstores. Delete Policy S.11	Planning permission has now been granted for the discount foodstore.	Delete policy and text
94	S.11		1	Extensions to Quedgeley District Centre	Tesco needs competition. This would not be provided by a discount foodstore. What is needed is another food superstore, especially if more houses are to be built at Hardwicke.	Remove allocation. Find a different site for a food superstore in Quedgeley.	Planning permission has now been granted for the discount foodstore	Delete policy and text

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
139	S.11		1	Extensions to Quedgeley District Centre	No need has been identified to extend Quedgeley District Centre on this scale - Chase and Partner's Gloucester Retail Study advises not to extend Quedgeley District Centre. The shopping allocation could be inconsistent with a district centre.	Delete Policy S.11. If it is to remain, then identify a need for the extension and a net floorspace. Clarify if any non-retail uses are intended.	Planning permission has now been granted for the discount foodstore	Delete policy and text
168	S.11		1	Extensions to Quedgeley District Centre	The existing development does not constitute a district centre. Its proposed extension would be environmentally inappropriate and would not allow a discount foodstore to be integrated into it.	None given	Planning permssion has nope been granted for the discount foodstore	Delete policy and text
203	S.11		1	Extensions to Quedgeley District Centre	Whilst supporting the area allocated for the extension, it should be bigger so that it includes Highliffe Farm and properties north of the Salmon Leap public house.	Increase area of allocation so that it includes Highliffe Farm and properties north of the Salmon Leap public house.	Disagree. There is no need for a further increase in the size of the district centre	No change
228	S.11	8.22	3	Extensions to Quedgeley District Centre	Tesco's support the principle of extending the district centre on the land adjoining the petrol filling station.		Note support.	

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
52	S.12	8.23 and 8.24	1	Seymour Road	Seymour Road should not be designated as a local centre. It is a limited scattered collection of shops. Seymour Road should be covered by Policy S.15 on Shopping Parades and Corner Shops.	Delete Semour Road as a local centre. Delete 'everyday goods in' and 'for everyday goods' in Policy S.12	Disagree. Although the shops in Seymour Road do not comprise a continuous group, they function as a local centre.	No change
164	S.13		1	Changes of Use in District and Local Centres	There is no justification for the period of one year in criteria 2	The criteria should be justified or deleted.	Agree. Replace 'one year' with a 'reasonable period of time'.	Amend policy accordingly
48	S.14		1	Barton Street Local Centre	The policy is too restrictive and would result in empty shops. It is more important to stop shops being empty, rather than being concerned if they are used as offices	A more pragmatic policy that encourages wider uses, including A1/B1 and leisure uses.	Disagree in part. The policy is more flexible than the previous one in the Interim Adoption Local Plan. However, agree that leisure uses could also be permitted outside the core shopping area	Amend policy accordingly
164	S.15		1	Shopping Parades and Corner Shops	There is no justification for specifying the period of one year in criteria one. Criteria 3 refers to 'the centre', but paragraph 8.28 refers to 'shopping parades and corner shops'	The criteria should be justified or deleted.	Agree. Replace 'one year' with a 'reasonable period of time'. Replace 'the centre' with 'a shopping parade'	Amend policy accordingly
199			1	Shopping Chapter	The shopping chapter does not provide clear guidance, misinterpreting government policy. It does not take account retail demand over the plan period, only up to 2004. It does not contain a criteria - based policy for developments outside the city centre.	Redraft the chapter in accordance with PPG6. Include a criteria based policy for developments outside the city centre	Agree that there is a need for a new policy.	Introduce new criteria policy on out of centre developments

Ref No	Pol No	Para	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendationn
52			3	Policy on a new district centre at Bristol Road	Properties between 32 and 90 (even numbers) should be designated as a new district centre. It is well served by public transport and has the opportunity to grow.	Designate 32 to 90 Bristol Road as a district centre.	Disagree. This group of properties does not perform the role of a district centre.	No change
207			2	New retail policy for unallocated sites	There is no criteria policy on new retail floorspace. This is needed for sites that become available after the Local Plan has been adopted. It would help simplify the Local Plan and provide flexibility.	Include a criteria policy on new retail floorspace.	Agree on the need for a policy	Introduce new criteria policy on out of centre developments

CHAPTER 9 - Commercial Leisure, Tourism and Culture

Ref	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217		9.4	1	Major Commercial Leisure Commitments in the Central Area	The plan should say that the Western Waterfront is also identified for commercial leisure development.	The paragraph should be amended to reflect this fact.	Blackfriars is proposed to be added to the Western Waterfront. The paragraph should be amended so that it makes clear that both Blackfriars and the Docks are part of the Western Waterfront.	Amend paragraph accordingly.
168	CL.1		1	Major Commercial Leisure Commitments	Within the Docks is a suitable, available site for the development of a major leisure development. No such site exists in the Blackfriars scheme. In any event no such development within Blackfriars should be permitted unless it can be shown that it would not materially prejudice the proposal of such development in the site identified for that purpose within The Docks.	Policy should be amended.	Disagree. Although planning permission does not exist for a major leisure development at Blackfriars, it is nevertheless suitable for one.	No change.

Ref	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
200	CL.1	1		Major Commercial Leisure Commitments	Object to the inclusion of Commercial Leisure commitments within the Plan as it is not the role of Development Plans to demonstrate existing planning consents or commitments.	Delete the commercial leisure commitments from the Plan.	Disagree. PPG12 (Paragraph 16) says that all plans should clearly be understood by all those who need to know about the planning policies...in the area'. Identifying commitments helps this process.	No change.
217	CL.1	1		Major Commercial Leisure Commitments	This policy proposes restraint on new commercial leisure developments beyond the advice in PPG6 and subsequent Ministerial speeches. It should not be necessary for leisure schemes in sustainable, central locations to prove 'need'. This requirement more properly applies to non-central locations where a stronger case must be made for development which is contrary to Government policy.	The proposed policy be modified to indicate that this requirement will only be applied to commercial leisure proposals outside the central area.	Disagree. Blackfriars and the Docks are priority sites for major commercial leisure development. It is important that other proposed developmet does not undermine them.	No change.
139	CL.1	3		Major Commercial Leisure Commitments	Support criterion 1 requiring new major commercial leisure development to demonstrate there is a need for the development.		Support noted.	

Ref Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
152 CL.1		3	Major Commercial Leisure Commitments	Supports the policy which seeks to ensure the implementation of the key development priorities in the central area. It does not prevent commercial leisure development elsewhere in the city but it does ensure that the priority is the regeneration of the central area.		Support noted.	
163 CL.2		1	Westgate Island (MU.2)	The gyratory would need to be reconstructed at considerable expense. It would not be a contribution, it would be the whole works. The County Council has not identified this as a road traffic scheme, therefore the developer would have to pay the full amount towards design and construction. The County Council also expresses concern at the absence of proposed residential development at this site.	Amend the text and policy accordingly.	Agree in part. The reference to a contribution should be omitted so that the obligation is for the replacement of the gyratory. Agree that residential should be included.	Amend policy accordingly.

Ref	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	CL.2		1	Westgate Island (MU.2)	Within The Docks is a suitable, available site for the development of a major leisure development. No such site exists in the Blackfriars scheme. In any event no such development within Blackfriars should be permitted unless it can be shown that it would not materially prejudice the proposal of such development in the site identified for that purpose within The Docks.	Policy should be amended.	Disagree. Although planning permission does not exist for a major leisure development at Blackfriars, it is nevertheless suitable for one.	No change.
184	CL.2		1	Westgate Island (MU.2)	A multi-storey car park should not be built on Westgate Island as it will spoil the amenity of the area and the setting of the Almhouses.	Delete allocation for a multi-story car park in Policy CL.2	Disagree. It is possible to include a multistorey car park in a new development that would improve the setting of the Almshouses. The text should be amended to say that a multi storey car park is preferred to a surface car park because it would help to create a scheme of a high quality design.	Amend text accordingly.

Ref	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
213	CL.2		1	Westgate Island (MU.2)	Object to the designation of the site for offices and limited comparison retailing. No evidence in the Local Plan that qualifies there is a demand for B1 office development. The site is an existing retail location and will be a more desirable location for further retail development and has the ability to accommodate large scale comparison retailing together with leisure uses and customer car parking.	The site should be allocated for further comparison retailing where it can be demonstrated that it will not have an unacceptable impact on the Blackfriars scheme or city centre as a whole. The provision of office space should be deleted.	Disagree in part. Removing the gyratory would make the site more accessible and more attractive for offices, as part of a mixed use development. Agree that comparison retailing could be permitted if its scale and the identity of the traders could be controlled so that there was no unacceptable impact on a scheme in the Blackfriars location and on the Primary Shopping Area.	Amend policy accordingly
200	CL.2		3	Westgate Island (MU.2)	Support for mixed use development of Western Waterfront.		Support noted.	
79		9.7	3	Late night uses in the Central Area	Strongly support including the introduction of quality restaurants, hotels and shops.		Support noted.	
163	CL.3		1	Late Night Uses Inside the Central Area (re. Evening Economy Strategy)	The Evening Economy Strategy should include more buses.	Include requirement for enhancement of evening public transport.	Agreed. Refer to improved late night bus services in the text.	Amend text accordingly.
225	CL.3		1	Late Night Uses Inside the Central Area (re. hours of operation)	It is not the role of the planning system to control extensions of hours for licensed premises.	Amend text of policy to reflect comments.	Agreed. Delete reference to controlling hours of opening.	Amend policy accordingly.

Ref	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
225	CL.3	3		Late Night Uses Inside the Central Area (re. Evening Economy Strategy)	Support the concept of an Evening Economy Strategy but it needs to address the lack of an evening economy between Sundays and Thursdays.		Support noted.	
139	CL.4	1		New commercial leisure development in district centres	The second part of the policy is superfluous. If the scale and type of development is appropriate to a district centre location, then it should not by its nature have an unacceptable impact on the implementation of commitments in the central area.	Delete second part of policy. Identify other locations where new or local centres are needed.	Agreed.	Delete last sentence of policy.
139	CL.4	3		New commercial leisure development in district centres	Support requirement for commercial and leisure developments to be of a scale and type to serve the suburban area.		Support noted.	
32	9.12	3		Tourism is a major growth industry for Gloucester.	Welcome recognition of employment benefits of tourism.		Support noted.	
32	9.12	2			Need to refer to current national, regional and local tourism policy framework; identify future trends in tourism; and the ways in which tourism can contribute to other Local Plan objectives.		Agree in part. The importance of tourism to other local plan policies should be recognised by adding tourism to the objectives of the Local Plan in the Strategy Chapter.	Amend the objectives accordingly

Ref	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
152		9.13	1	Table 6: Top 10 Tourist Attractions	Objects to Table 6 as it underplays the role of The Docks as an attractor of visitors to the city because the other attractions listed in Table 6 are located at The Docks and should contribute to the overall visitor figures for The Docks.	Table 6 should be amended to show an overall visitor figure of 1,681,577 which includes Gloucester Antiques Centre, Mariners Church, National Waterways Museum, Queen Boadicia and Soldiers of Gloucestershire.	Disagree. It is considered that the estimated figures in the table are unreliable, and the table should therefore be deleted. However, the text should be amended to make clear that the Docks are the top tourist attraction in the county.	Delete Table 6 and amend the text accordingly.
32	T.1		3	Visitor Attractions	Tourism is important to improving the vitality and viability of the central area, but any future development must retain the city's local character and distinctiveness.		Agreed. But this is covered by Policy BE.7 Architectural Design in the Built Environment Chapter.	No change
164	T.1		1	Visitor Attractions	The policy could make reference to the proviso that such developments will be permitted "where there would be no adverse impact on traffic and environmental quality"	Amend text by adding in suggested proviso.	Agreed.	Amend policy accordingly.
199	T.1		3	Visitor Attractions	Support in principle for the creation of new tourist developments in the central area.		Support noted	

Ref	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
168	T.2	1		New Hotel Development on Westgate Island	This allocation has the effect of removing edge of centre car parking which would undermine the attractiveness of Gloucester as a place to shop and visit. It is also inextricably linked with the proposed sale and redevelopment of the Cattle Market.	Delete allocation from the plan.	The application for the hotel now has planning permission	Delete allocation.
199	T.3	3		New Hotel Development in the Central Area	Support in principle for the provision for new hotel development in the central area.			Support noted.
1	T.3	2		New Hotel Development in the Central Area	A central quality hotel rather than housing on Hampden Way car park.		Disagree. The site is unsuitable for a hotel because it would not be well linked to tourist attractions.	No change.
225	T.4	3		Change of Use of Dwellings to Guest Houses	Support guest house development but need to address the lack of on and off street parking in the central area.		Paragraph 9.23 makes clear that the availability of parking will be taken into account when applications for guest houses are determined.	Support noted.
141	T.5	3		Provision of a Youth Hostel	Supports the suggestion that a Youth Hostel should be provided in the city as the county is now very poorly provided with hostels.		Support noted.	

Ref Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164 T.6	1		Provision of New Public Toilets	In view of the requirements of Part M of the Building Regulations in respect of access for the disabled, the policy could reasonably require rather than expect the provision of accessible public toilets.	Amend text by deleting the word "accessible" in Policy T.6	Agreed.	Amend policy accordingly.
163 C.1	1		Cultural Facilities - bus enhancement e.g. evening services	Leisure is an off peak business	Appropriate bus enhancement should be sought for cultural facilities e.g. evening services.	Disagree. The need to improve evening bus services is to be added to Policy CL.3 on the evening economy strategy.	No change.
225 C.3	3		A Multi Purpose Venue	Support the concept of a multi purpose venue in The Docks.			Support noted.

CHAPTER 9 T = TYPE 1 - Objection 2 - Omission 3 - Support

CHAPTER 10 - Open Space, Sport and Recreation

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
141		10.1	3	Chapter 10 Open Space, Sport and Recreation	Support the policies proposed in Chapter 10 in the interest of physical exercise. General cycle tourists will enjoy their leisure occupation by riding on public roads or bridle paths or conversions installed by organisations like Sustrans.	none	Support noted.	
157		10.1 10.4	3	Access to open space sport and recreation	Supports the key objective "that everyone has access to the appropriate amounts of open space, sport and recreation facilities to meet present and future needs".		Support noted.	
66		10.11	1	The Gloucestershire and Sharpness Canal	The canal will be needed again as a commercial waterway linking London, the Cotswolds, the Midlands to the Severn Estuary.	Cancellation of IRR4 and the South West By-pass in the County Structure Plan.	The canal may be needed to carry freight. The County Council is committed to completing IRR4 and the South West By-pass.	No change to paragraph.
CHAPTER 10		T = TYPE		1 - Objection 2 - Omission 3 - Support				

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
233		10.11.	2	New policy on recreational routes using watercourses.	It is recommended that a policy is included referring to the value of watercourses throughout the city as existing and potential linear routes. The Plan under policy FRP.5 seeks an 8m wide strip, this strip could also provide for pedestrian and cycle routes as appropriate. However, it may be necessary to designate a wider strip where there may be a potential conflict with nature conservation or flood defences.	Include a policy.	The enhanced use of the waterways for recreation is one of the Council's overall policies, it is not considered to be a land use planning matter, however paragraph 10.11 refers to the importance of the canal as a recreational waterway	No change

Ref No	Pol No	Para No	T Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217		10.12	1 Public Open Space	<p>Challenges the statement that the City as a whole is deficient in POS provision. The draft POS Strategy (1999) divided the city into 21 divisions of which 11 were shown to have provision in excess of standard, 2 were borderline and 8 were shown to have provision lower than the standard. Throughout the city, the Strategy concluded the provision lay at 2.22 ha per 1000 population relative to the 2.43 standard (6 acre). The Strategy did not take into account private open space to which the public might have access to, nor general amenity land, nor Robinswood Hill County Park. The Local Plan should take into account PPG17 and adopt policies for the protection of existing and the provision of new facilities on the basis of a robust assessment of need and use this to set standard for recreational provision. The Council's assessment of need does not support the emerging policies and</p>	Amend policy.	<p>The Public Open Space Strategy which was adopted by Council in July 2001 splits the city into 21 divisions. Each division is assessed by the quantity of public open space in the three categories of sport, play and general open space. Of the 21 divisions, only eight meet the adopted standard of 2.8 ha per 1000 population, only 3 divisions meet the adopted standard of 1.7 ha per 1000 for formal sport and no division meets the children's play standard of 0.7 ha per 1000 population. The majority of public open space in the city falls into the category of general open space with 20 divisions meeting the adopted standard of 0.4 ha per 1000 population. Throughout the city, the adopted strategy concludes that the provision of 2.19 ha per 1000 population is 66 ha short to meet the needs of a population of 109,264 and the 2.8 ha adopted standard (7 acres). Therefore the City as a whole is severely deficient in POS provision in quantity terms. The Strategy looks at the provision of open space that is publicly available and it does not include private open space which cannot be guaranteed as being available to the general public. The Strategy does not</p>	<p>No change to paragraph 10.12, but amend paragraph 10.15 to define public open space and to explain the higher standard chosen.</p>

revised POS standards.
There is no justification
for increasing the
standards of POS
provision.

include Robinswood Country
Park because the park is
peripheral and inaccessible by
foot to many of the city's
inhabitants. The justification for

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation	
7		10.12, 10.13	2	British Rail Sports Ground as Public Open Space	Site omitted from policy despite lack of open space in this part of Gloucester.	Allocate the BR Sports Ground site as public open space and protect from development under Policy OS.1.	increasing the POS Standard is explained in paragraph 10.15 of the First Deposit Local Plan. The Council adopted a robust assessment based on the NPFA standards. The BR Sports Ground is in private ownership and therefore it is not shown as public open space on the Proposals Map and Policy OS.1 does not apply to this site. Additionally outline planning consent for part of the site to be developed for houses was granted subject to a legal agreement in March 2002.	No change.	
164	OS.1		1	Protection of Public Open Space	In the interests of clarity the first sentence might usefully refer to "public open spaces as defined on the Proposals Map"	Amend Policy accordingly.	Agreed.	Change text.	
CHAPTER 10		T = TYPE 1 - Objection 2 - Omission 3 - Support							Page 4 of 50

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation	
33	OS.1		3	Protection of Public Open Space	Support identification of Hempsted Recreation Ground as public open space. Does not support the proposed land swap/relocation of the recreation ground.		Support noted.	This is not a matter for the current local plan, the idea is currently being discussed by residents groups. No change	
71	OS.1		3	Protection of Public Open Space	There is a definite lack of green areas/parkland in Quedgeley. More open green areas are desperately needed to be established before all of the proposed land is built on. The site identified for future use at Waterwells is not very convenient to residents living west of the A38.	Acquisition of land within Quedgeley for use as public open space.	There is a large site identified for future public open space at Waterwells Farm. Although not so accessible to the residents on the western side of Quedgeley, the site will be accessible for residents of the area occupied by RAF Quedgeley.	No change.	
157	OS.1		3	Protection of Public Open Space	Supports Policy OS.1 which is in accordance with Sport England's Planning Policy Objective 6.		Support noted.		
CHAPTER 10		T = TYPE 1 - Objection 2 - Omission 3 - Support							Page 5 of 50

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	OS.1		3	Protection of Public Open Space	Supports the protection of public open space. However, the tests set out do not include any consideration of the level of open space currently provided in the local area which is contrary to PPG17.	Policy to be amended in accordance with PPG17 to state that the loss of POS may be acceptable where there is currently an excess of such provision within the local area.	Support noted. Although the provision of public open space is surplus in some areas, there are 6 areas of Gloucester out of the 21 in the Open Space strategy that are well below the standard. Even within the areas with good levels, access to space and facilities is not always to the desirable standard. Therefore the overall city deficiency means the council's policy will be to retain all existing areas of public open space unless it is demonstrated that the social and economic benefits of any new development would provide sufficient community benefit to outweigh the loss as highlighted in paragraph 10.13.	No change.
66		10.14	1	Public Open Space	The industrial parkland at RAF Quedgeley needs to be conserved as an existing green field belt around Gloucester conurbation.	A 250 year masterplan with strategies to suit which includes a permanent green belt more or less as existing around Gloucester.	The RAF Quedgeley site was green land but never green belt land. The site is allocated for comprehensive mixed use development in the First Deposit Local Plan and Quedgeley has been identified as a key strategic employment location for high quality employment development in the Gloucestershire Structure Plan Second Review.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	OS.2	10.15	1	Public Open Space Standard for New Residential Development	Objects to the arbitrary alteration to accepted standards (NPFA 2.4ha per 1000 people). The increase to 2.8ha is ill founded and unjustified. The justification based on an increase in densities is rather naïve as the NPFA standard applies to all residential densities. Regard should also be had to the requirements of Circular 1/97.	None given.	The NPFA standard of 2.4ha per 1000 people is a minimum standard. This standard is for outdoor playing space and does not include an element of public open space for passive recreation . It also includes privately owned recreational land that may not be accessible by the public. The city council considers public open space to be land only freely available for use by the public. In addition higher residential densities will be sought in the future with smaller garden sizes and will include dwellings with smaller gardens and no gardens at all. This will put more pressure on existing public open space facilities. Therefore it is considered appropriate to increase our public space standard to 2.8 hectares (7 acres) per 1000 population to add in an element of general recreation.	No change to policy OS2, but make changes to paragraph 10.15, to support higher open space standard.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
149	OS.2		1	Public Open Space Standard for New Residential Development	The policy is overly restrictive in terms of open space provision and should be revised to account to the 6 acre standard as a maximum. Consideration should be given to an overall reduction in application of the 6 acre standard as it is acknowledged now that people tend to recreate more passively than formally, considering activities such as shopping to be recreational.	None given.	Paragraph 10.15 supports the Council's reasons for increasing the 6 acre standard. It is not acknowledged that people recreate more passively than formally, with the increase in leisure time and the increasing interest in health and wellbeing	No change except further clarification in paragraph 10.15
203	OS.2		1	Public Open Space Standard for New Residential Development	The justification for a 7 acre standard is noted. However, it is considered preferable that for housing intended for families adequate space is provided within the gardens and public open space is provided in accordance with the 'six acre' standard.	The policy should be amended to differentiate between different forms of residential development.	Even with housing intended for families, the design may result in smaller garden sizes, therefore it is still considered appropriate that a standard of 7 acres is applied to add in an element of general recreation.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	OS.2		1	Public Open Space Standard for New Residential Development	Objects to increase in POS standard to 7 acres. The objective of increasing housing densities is to make best use of urban land conflicts with the introduction of higher POS standards and would work against the government objectives as set out in PPG3. The amount of POS is based on population and will not change on the basis of increase in density or reductions in garden size.	Policy OS.2 should be amended to require open space standards in accordance with the NPFA 'Six Acre Standard'.	The Council's justification for the higher standard is given in paragraph 10.15. Although PPG3 does highlight that L.A's should avoid the inefficient use of land, paragraph 52 highlights the importance of greening the residential environment and that developing more housing within urban areas should not mean building on urban green spaces.	No change to policy OS.2, enhance justification in paragraph 10.15

CHAPTER 10 T = TYPE 1 - Objection 2 - Omission 3 - Support

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	OS.3		1	New Housing and Public Open Space	Objects to this policy as it has no regard to Circular 1/97, that planning obligations should be fairly and reasonably related in scale and nature to the development. As such this policy provides no scope to assess local circumstances or the possibility of a surplus of open space already existing in the local area. The policy is inflexible, provides little scope for negotiation, and is contrary to C1/97.	None given.	Noted, Policy OS3 will be amended to include reference to the Public Open Space Strategy and to developments proposed in areas with a surplus of Public Open Space where the council may allow the payment of commuted sums in lieu of new open space provision.	Make appropriate changes to policy OS.3
170	OS.3	10.16, 10.17,	1	New Housing and Public Open Space	The requirement for a financial contribution towards POS for single or small groups of dwellings is unreasonable unless there can be shown to be a direct benefit in terms of location etc.	Deletion of second paragraph of Policy OS.3	Disagree, all new houses will add to the demand on the Public Open Space and the Public Open Space Strategy highlights an overall deficiency in public open space for the city. Even in areas of Public Open Space surplus, there is still a need for improved facilities. Policy OS3 will be amended to highlight that the payment of commuted sums may be allowed, provided that the site is well located in respect of the existing public open space.	Make appropriate changes to policy OS3

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	OS.3		1	New Housing and Public Open Space	Objects to a blanket POS that should apply to all new residential development. This is not in accordance with Circular 1/97 which states that planning obligations should only be sought where existing facilities do not have sufficient capacity or require investment to meet the extra demands placed upon them by new development.	Policy OS.3 should be amended to state that the Council will only seek the provision of POS where a deficiency of recreational provision exists or likely to occur as a result of the proposed development.	The Public Open Space Strategy highlights that Gloucester City has an overall deficiency of public open space. Even in areas of surplus open space, the facilities in the public open space need improving. It is considered that all new residential development, even single dwellings will impact on the public open space and therefore all new residential development should contribute towards new provision or improvements to off-site facilities in the locality. Policy OS3 will be amended to state that where new development is proposed in an area with a surplus of Public Open Space, the City Council may allow the payment of commuted sums in lieu of new open space provision.	Make appropriate changes to Policy OS.3

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	OS.3		1	New Housing and Public Open Space	Objects to the Council applying costs for off-site provision of POS which are contained in the draft SPG but not in the Local Plan. It is unacceptable for the Review to be used as the 'approval' process for critical information which is not actually expressed in the Plan.		The figures in the SPG are monetary figures which need to be updated annually to reflect current prices. The figures cannot therefore be incorporated into the local plan. This response only deals with policy OS.3, the objections to the draft SPG will be dealt with later.	No change.
157	OS.3		3	New Housing and Public Open space	Supports Policy OS.3 which seeks to ensure adequate sporting provision is made within all new housing developments and that planning obligations for sport and recreation are used where on site provision is not attainable which is accordance with Sport England's Planning Policy Objective 8 and 9.		Support noted.	

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	OS.4		1	Design of Public Open Space	The minimum area for POS acceptable to the Council is too low. LAPs and LEAPs can be satisfactorily accommodated on areas less than 0.2 ha. The policy is too restrictive and does not allow for specific site circumstances or innovative design solutions.	Delete the minimum size criterion from this policy.	A minimum size criterion is needed to ensure that the Public Open Space provided is a usable space for recreation and is large enough for easy maintenance.	No change.
157	OS.4		3	Design of Public Open Space	Supports Policy OS.4 which seeks to ensure adequate sporting provision is made within all new housing developments and that planning obligations for sport and recreation are used where on site provision is not attainable which is accordance with Sport England's Planning Policy Objective 8 and 9.		Support noted.	

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
122	OS.5		1	Maintenance Payments for Public Open Space	Objects to the requirements of the policy that maintenance sums should be required from the developer in perpetuity. Regard should be had to the detailed requirements of Circular 1/97.	None given.	Noted, circular 1/97 B.14 highlights that payments should be time limited and not be required in perpetuity. Policy OS5 will be amended to request a commuted sum to cover future maintenance costs for a period of 10 years. The interest on the lump sum will be used to pay for the maintenance.	Make appropriate changes to policy OS5 and the supporting text (paragraph 10.21)
132	OS.5		1	Maintenance Payments for Public Open Space	The policy is vague and it is not clear what "an appropriate commuted sum" means.	None given.	Noted, the policy will be amended to improve clarity, a commuted sum will be requested that will cover future maintenance costs for a period of 10 years. Paragraph 10.21 cross refers to the SPG to explain what an appropriate commuted sum is.	Amendments to Policy OS5 and supporting text in paragraph 10.21
164	OS.5		1	Maintenance Payments for Public Open Space	The seeking of payments "in perpetuity" is excessive and goes beyond the scope of national guidance as set out in Circular 1/97.	None given.	Noted, paragraph B14 of Circular 1/97 highlights that payments should be time limited and not be required in perpetuity. Policy OS5 will be amended to request maintenance costs of public open space for a period of 10 years. The text in paragraph 10.21 will also be amended to reflect this.	Change text in policy OS5 and paragraph 10.21

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	OS.5		1	Maintenance Payments for Public Open Space	Supports the principle of seeking a commuted sum for maintenance of POS, however, the use of a 'blanket' maintenance period that applies to all adoptions of POS is considered contrary to paragraph B17 of Circular 1/97 in that it fails to take account of individual circumstances and whether the contribution is fairly and reasonably related to the specific development. The length of period sought (ie perpetuity) is considered unreasonable and clarification by the Council would be welcomed.	The reference to the payment of a sum in perpetuity should be deleted and replaced with a requirement that a sum be sought to pay for the future maintenance of POS for a period to be agreed.	Noted, Circular 1/97 paragraph B.14 states that payment should be time limited and not be required in perpetuity by planning obligations. Policy OS5 will be amended so instead of referring to in perpetuity, the policy will request maintenance costs for a period of ten years. The amount of contribution will be related to the particular development using the tables in the Supplementary Planning Guidance.	Amend policy OS.5 and paragraph 10.21
66	OS.6		1	Provision of Open Space by Other Development	Massive area and height development at Railway Triangle would have formal and passive recreation.	Acquisition of the Whitbread Brewery site and all railway land including the railway triangle for a massive development for 1000 year life time.	The Railway Triangle has been designated as an employment site, the amount of open space would have to be carefully considered with regard to accessibility for the surrounding housing. The plan is only for 10 years and therefore will not look at developments with 1000 year lifetime.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	OS.6		1	Provision of Open Space by Other Development	The 5% / 0.2 ha standards contained within the policy have not been based on any reasoned justification in either the policy or supporting text.	The policy should be redrafted or deleted.	Disagree, 5% of the gross site area or 0.2 hectares is considered to be the smallest manageable area and will give an area large enough to provide a usable recreation area. (see paragraph 10.18 and 10.20)	No change
71		10.23	2	New Public Open Space on former Married Quarters, Quedgeley	An ideal location for green open space/parkland is the Old Officers Married Quarters area just off Tesco's roundabout on Bristol Road. This is a large green area with many well established trees that is also central to the residents of Quedgeley.	Acquisition of Old Officers Married Quarters Area for future public open space.	The north of the site has been granted planning permission for a discount food store. Many of the trees to the north of the married quarters have had TPO placed upon them. The area cannot be designated as Public Open Space as it is privately owned and there is no mechanism to turn private land into public open space unless it is handed over to the City Council by the landowner.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
94		10.23	2	New Public Open Space on 'north of Highliffe Farm' site	The area allocated as an extension to the Quedgeley District Centre should be secured as parkland to serve the residents of Quedgeley because of the shortage of public open space in the area.	Remove shopping allocation. Protect existing green open area with mature trees and allocate as public open space.	The land at Quedgeley District Centre will be de-allocated as an extension to the centre. However, a Discount Food store has been granted permission on part of the site. The majority of the trees have been retained on the southern part of the site and are protected by a TPO. The land is under private ownership and unless the land is handed over to the City Council by the landowner, there is no means to turn this land to Public Open Space.	The shopping allocation has been deleted, a TPO now covers the majority of the trees, but the area cannot be allocated as public open space as it is in private ownership. No change to paragraph 10.23.
34		10.23 to 10.29	2	New Areas of Public Open Space - Land at Brionne Way	Omission of part of land to the north of Brionne Way (previously reserved as a school site) for public open space.	Designate this land at POS to extend the 'green chain' alongside the A40.	Although now no longer reserved as a school site, the land is in private ownership and unless the land is handed over to the City Council by the landowner, there are no means to turn it into Public Open Space.	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
170		10.23, 10.24,	1	New Areas of Public Open Space.	Opportunities should be investigated to provide large areas of POS by permitting good quality low density housing in peripheral areas of the city. This housing would fund the POS by bringing forward suitable land which would be more effective than policy OS.3 requiring a financial contribution.	Opportunities should be investigated.	The Council is aiming to achieve redevelopment of brownfield sites and especially sites in central locations. Additionally policy H7 seeks the highest possible densities consistent with the character of the locality. Policy OS3 aims to target all new housing developments (housing schemes for special groups, as listed will be considered more flexibly).	No change regarding objection

CHAPTER 10 **T = TYPE** **1 - Objection** **2 - Omission** **3 - Support**

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
13	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Object to turning the square into public open space.	Keep the square as it is, but plant more trees and flowers.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain car parking for businesses in the short to medium term.</p> <p>However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.</p>	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
45	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to part of St.Michael's Square being allocated as public open space. It should be kept as a car park.	Delete allocation for POS.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain car parking for businesses in the short to medium term.</p> <p>However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.</p>	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
108	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	The housing would damage the areas architectural significance and totally enclose and cut off the open space from the city. The open space remaining would be fundamentally damaged by its reduction in size, the reduction in light and the overlooking from the housing. The open space and housing are contradictory proposals. Many trees will be lost. Parking will be inadequate for residents and disastrous for businesses. City centre Squares always have an open side e.g.. Brunswick Square. Inadequate consultation has been undertaken with residents and businesses.	Remove the allocation in its current form.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Goscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
110	OS.7	10.24	1	New Areas of Public Open Space - Part of St. Michael's Square	Objects to the proposed allocation for housing and public open space.	Allocate the whole site as public open space as stated in the Council's draft POS Strategy page 53.	<p>Although many are concerned about the impact of the proposed housing it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain car parking for businesses in the short to medium term.</p> <p>However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.</p>	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
111	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to the proposed allocation for housing and public open space. Car parking is needed in the city centre.	Leave the square alone as it is. More landscaping and general renovation is all that is needed.	Although many are concerned about the impact of the proposed housing it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Goscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
130	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	The proposed allocation is inappropriate and will not encourage regeneration. The amenity value of the Square will be damaged by building on the frontage. The council's ability to manage another green space must be questioned. The development is not necessary to fulfill the housing requirement.	Delete the housing allocation and increase the POS allocation to cover the whole square.	Although many are concerned about the impact of the proposed housing it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Goscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the Square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
172	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	<p>Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain car parking for businesses in the short to medium term.</p> <p>However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.</p>	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
175	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
178	OS.7	10.24	1	New Areas of Public Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
180	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
182	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Goscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
183	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
184	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
224	OS.7	10.24	1	New Areas of Public Open Space - Part of St. Michael's Square	Objects to only part of St. Michael's Square being proposed as public open space.	Amend policy to allocate the whole square as public open space.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
227	OS.7	10.24	1	New Areas of Public Open Space - Part of St. Michael's Square	Loss of car parking in St. Michael's Square would severely effect business by restricting access for clients, as well as having a detrimental effect on residents, shoppers and college users. It will exacerbate existing problems and this may lead to the current unrestricted access to the parking at St. Michaels Court at evenings and weekends being withdrawn. Housing on the frontage will add to parking problems. These proposals will lead to relocations out of town and add to the decline of the centre. A public open space in the centre will not work practically unless properly patrolled, and there is a questionmark over whether its needed given the proximity to the Park.	Delete policy.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
235	OS.7		1	New Areas of Open Space - Part of St. Michael's Square	Leave St. Michael's Square as it is. Gardens would bring in drunks and troublemakers.	Remove the policy.	Although many are concerned about the impact of the proposed housing, it is not accepted that it will detract from the square subject to a satisfactory design. The Housing which can help fund improvements to the square, is intended to give the area an up-lift. While many support changing the square to public open space, it is considered that there is a need to maintain public car parking for businesses in the short to medium term. However, the amount required is likely to reduce, particularly when the planned relocation of Gloscat takes place. The longer term aim should, therefore, remain to provide an open space for residents that might attract families back to live in the square and broaden the mix of household types. However, in the short term there is a need to retain parking for both residents and visitors, and achieve environmental improvement to the Square. The supporting text should therefore be changed to enable an interim scheme to be implemented providing an enhanced square and residents and public parking.	Amend paragraph 10.24(a) but retain allocation for part of the square as public open space, amend Policy OS7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
173	OS.7		3	New Areas of Open Space - Part of St. Michael's Square	Supports the allocation for part of St. Michael's Square to be public open space where residents can meet and a safe place for children to play.		Support noted	
191		10.25	1	New Areas of Public Open Space. New site at Woolstrop Cottage	There is an acute need for additional POS in the area surrounding Woolstrop Cottage. The proposal for 0.2 ha of POS with some limited housing is inadequate. The moat is a scheduled ancient monument and is of nature conservation interest and has no potential for recreational use. The site is required to provide opportunities for informal recreation. The City Council should therefore continue its endeavours to purchase this site as previously proposed.	Add a policy to allocate Woolstrop Cottage for public open space.	Agreed, Woolstrop Cottage has been de-allocated for housing development and the site will be allocated for Public Open Space. However, the Council does not have public funds to purchase the site as public open space and some development on the frontage may be justifiable if this secures public open space on the remainder of the site.	Amend policy OS7, paragraphs 10.24 and 10.25 and create new paragraph 10.25(a)

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
223	10.25	1		New Areas of Open Space - Part of St. Michael's Square	There is not enough open space in Quedgeley.	Allocate Woolstrop Cottage as open space.	Agreed, Woolstrop Cottage has been de-allocated for housing development and the site will be allocated for Public Open Space. However, the Council does not have public funds to purchase the site as public open space and some development on the frontage may be justifiable if this secures public open space on the remainder of the site.	Amend policy OS7, paragraphs 10.24 and 10.25 and create new paragraph 10.25(a)
18	10.25	2		New Areas of Public Open Space. New site at Woolstrop Cottage	Woolstrop Cottage is the last green open space available to provide a play area.	Allocate site as public open space - a grass area with some goal posts.	Agreed, Woolstrop Cottage has been de-allocated for housing development and the site will be allocated for Public Open Space. However, the Council does not have public funds to purchase the site as public open space and some development on the frontage may be justifiable if this secures public open space on the remainder of the site.	Make appropriate changes to Policy OS7, amend paragraphs 10.24 and 10.25 and create new paragraph 10.25(a)

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
19	10.25	2		New Areas of Public Open Space. New site at Woolstrop Cottage	Woolstrop Cottage would be a good place for children to play.	Allocation site as a dog - free public open space for the local children.	Agreed, Woolstrop Cottage has been de-allocated for housing development and the site will be allocated for Public Open Space. However, the Council does not have public funds to purchase the site as public open space and some development on the frontage may be justifiable if this secures public open space on the remainder of the site.	Make appropriate changes to Policy OS7, amend paragraphs 10.24 and 10.25 and create new paragraph 10.25(a)
30	10.25	2		New Areas of Public Open Space. New site at Woolstrop Cottage	Woolstrop Cottage should be a public park for young children & their parents to enjoy.	Allocate site as public open space.	Agreed, Woolstrop Cottage has been de-allocated for housing development and the site will be allocated for Public Open Space. However, the Council does not have public funds to purchase the site as public open space and some development on the frontage may be justifiable if this secures public open space on the remainder of the site.	Make appropriate changes to Policy OS7, amend paragraphs 10.24 and 10.25 and create new paragraph 10.25(a)
103	10.25	2		New Areas of Public Open Space. New site at Woolstrop Cottage	The contribution that Woolstrop Cottage can make to public open space is referred to at paragraph 10.25 and this should therefore be included in the Policy.	Include a Policy on the provision of public open space at Woolstrop Cottage.	Agreed, Woolstrop Cottage will no longer be allocated for housing, instead it will be allocated for public open space in Policy OS7	Make appropriate changes to Policy OS7, paragraph 10.25 and add new paragraph 10.25(a)

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
176		10.25	2	New Areas of Public Open Space. New site at Woolstrop Cottage	There is very little POS in Quedgeley and securing Woolstrop Cottage would help towards this imbalance. The whole site, if properly managed, would allow the Scheduled Ancient Monument to be preserved in good order.	Allocate Woolstrop Cottage as public open space.	Agreed, Woolstrop Cottage has been de-allocated for housing development and the site will be allocated for Public Open Space. However, the Council does not have public funds to purchase the site as public open space and some development on the frontage may be justifiable if this secures public open space on the remainder of the site. The Public Open Space would also enhance the setting of the Scheduled Ancient Monument.	Make appropriate changes to Policy OS7, amend paragraphs 10.24 and 10.25 and create new paragraph 10.25(a)
163	OS.8		1	Two Mile Bend	Potential conflict between proposed waste transfer site at Two Mile Bend and new open space allocation		The proposed site for the Waste Transfer Site is separated from the Public Open Space at Two Mile Bend by the proposed South West Bypass so there will be no conflict.	Policy OS.8 will be deleted and the proposed allocation will be in policy OS.7
166	OS.8		1	Two Mile Bend	The site at Two Mile Bend, given its location on the canal and the proposed South West Bypass is an ideal location for a waste freight transfer depot. The allocation for POS is contrary to the Gloucestershire Waste Local Plan which proposes site RD13 for a waste transfer facility.	Delete policy OS.8	The proposed Waste Transfer Site would be located to the east of the proposed open space. The Waste Transfer depot would be separated from the Public Open Space by the South West Bypass and the allocation is therefore not contrary to the proposal in the Gloucestershire Waste Local Plan.	Policy OS.8 will be deleted and the proposed allocation will be in policy OS.7

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
200	OS.8	1		Two Mile Bend	Objects to the allocation of Two Mile Bend as future POS as this is a more suitable site for a waste transfer station as set out in the Gloucestershire Waste Local Plan.	Delete policy.	The proposed Waste Transfer Site would be located to the east of the proposed open space. The Waste Transfer depot would be separated from the Public Open Space by the South West Bypass and the allocation is therefore not contrary to the proposal in the Gloucestershire Waste Local Plan.	Policy OS.8 will be deleted and the proposed allocation will be in policy OS.7
157	OS.8	3		Two Mile Bend	Supports Policy OS.8 which seeks to allocate land at Two Mile Bend for an informal waterside recreation area which is accordance with Sport England's Planning Policy Objective 26.		Support noted. Policy OS.8 deleted and site allocated in Policy OS.7	Policy OS.8 will be deleted and the proposed allocation will be in policy OS.7
157	SR.1	3		Land Identified for Rowing Club Facility	Supports Policy SR.1 which seeks to allocate a site for a Rowing Club facility which is in accordance with Sport England's Planning Policy Objective 26.		Support noted.	

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	10.31, 10.32 10.33 10.34	1		Private Playing Fields	Object to the allocation of the land as private playing fields at Longlevens. These sites are redundant for Educational purposes and following appropriate development the proceeds are committed to be reinvested in providing new primary school facilities and new recreational facilities with a permanent free dedication of a large area of land for public open space or public playing fields.	Delete designation of private playing fields to two sites east and west of Paygrove Lane, north of Longlevens Infant School.	Disagree, the Public Open Space Strategy highlights that the majority of POS in the Longlevens Area is peripheral, with an evident deficiency within the central core. The Public Open Space Strategy highlights how the area is underused open space for recreation and play and the Play area needs upgrading to NEAP standard.	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
139	10.32	1			<p>It should be noted that playing fields and recreational in Upton St. Leonards are generally used by residents from the south of the city. Some recognition of such a role would be helpful particularly if the residents of Upton St. Leonards wish to use their own facilities. Adequate POS provision should be sought in the Abbeymead and Matson areas to serve the city's needs.</p>	<p>Amend para 10.32 to include reference to the role of adjacent communities in providing for the city residents' recreational needs. Propose new allocations to meet the existing city residents' needs.</p>	<p>Disagree, the Public Open Space Strategy did not consider areas outside the city boundary so there is no evidence of use by Gloucester residents of neighbouring provision. It is not considered that the issue of using neighbouring facilities is relevant as the owners of neighbouring facilities can always control access. Additionally, the Open Space Strategy highlights that although there is a slight deficiency of open space in Matson, to a degree this is off-set by Robinswood Hill Country Park and the Abbeymead area meets the adopted POS standards and additional POS is expected at Coney Hill Hospital site.</p>	<p>No change</p>
203	10.32	1	Playing Pitch Analysis	<p>Objects to City Council's Playing Pitch Analysis. Their own research indicates that there is still an adequate supply in the city with a surplus capacity of 14-28 football pitches.</p>	<p>Non given.</p>	<p>Disagree, the Playing Pitch Analysis Survey (June 1999) highlights that looking to 2011, in a worst case scenario there would be a deficit of 9-15 football pitches and even if all potential gains are secured and informal dual-use arrangements continue, there could still be a deficit of 2 pitches.</p>	<p>No change.</p>	

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
7	SR.2	1		Playing Fields and Recreational Open Space	Criteria of policy are too weak and would be difficult to defend at appeal.	Strengthen criteria.	Disagree, the criteria listed follow the criteria listed in paragraph 42 of PPG17.	No change
156	SR.2	1		Playing Fields and Recreational Open Space	Criterion 2 of the policy needs to acknowledge that alternative provision should not be limited to the same sport as was accommodated on the development site. Improvements to the quality and access to existing general recreational and sporting facilities elsewhere in the city should also satisfy this criteria.	Suggest replacement of the word "and" with "or" in line 8 of policy SR.2.	The criteria does not limit the alternative provision to the same sport. It just asks for facilities of equivalent benefit or better recreational standard. It is not considered appropriate to replace and with or, as both criteria are important.	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
160	SR.2	1		Playing Fields and Recreational Open Space	<p>The British Energy site incorporates private open space & recreational facilities such as a pitch n putt course and bowling green. Likely that some of this open space will be a constraint to appropriate mixed use redevelopment proposals on the site. The policy should incorporate sufficient flexibility to allow for circumstances where satisfactory alternative provision of open space and / or recreation facilities are made on the same site. The current wording of the policy does not make it clear whether "another appropriate and equally accessible location" could be interpreted as being another location on the same site.</p>		<p>The British Energy Site is no longer available and will not be progressed for redevelopment. It is considered that the policy does incorporate sufficient flexibility to allow for circumstances where sufficient alternative provision of open space are made on the same site. These scenarios are dealt with by criterion 1 of the policy. It is considered that the criteria listed cover all eventualities between them.</p>	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	SR.2	1		Playing Fields and Recreational Open Space - The Cricket Square, RAF Quedgeley	Objects to the designation of the Cricket Square at RAF Quedgeley as private playing fields. The use is historic, informal and occasional associated with the former RAF use. The land serves no current sporting use. It's designation is unnecessarily restrictive given that the area falls within a proposed Landscape Conservation Area.	Delete private playing field designation at RAF Quedgeley.	Disagree, in the statement of Common Ground from the Quedgeley Urban Village Limited, they accept that the retention of the main central square, shown as private playing field on the Local Plan Proposals Map, would meet the requirements of both policies, accordingly no built development will be constructed within the area shown as private playing fields on the Proposals Map. It is important to retain Private Playing Fields given the overall deficiency of Open Space in the city.	No change
167	SR.2	1		Playing Fields and Recreational Open Space	Objects to the policy as it is ambiguous about the nature of land to which it is intended to apply in relation to the designation of "private playing fields" on the Proposals Map and the link between these and Policy SR.2.	Redraft policy to provide clarification.	Noted, the supporting text in paragraph 10.32 will be amended to clarify that private playing fields are shown on the proposals map so that it is possible to differentiate between private playing fields and public open space across the city.	Make appropriate changes to paragraph 10.32

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
203	SR.2	1		Playing Fields and Recreational Open Space	Objects to the identification on the Proposals Map of the former British Rail Sports Ground as 'private playing field' under policy SR.2. This playing field has not been used in 15 years and there are no plans to bring it back into use. Part of the site was an allotment garden not playing fields.	Delete SR.2 notation from the Proposals Map from land at the eastern end of Windfall Way.	Disagree, just because a playing field has not been used for 15 years does not mean that it cannot provide a private playing field. However, permission has now been granted subject to a S.106 for housing on part of the site.	The proposals map will be updated in due course.

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Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
204	SR.2	1		Playing Fields and Recreational Public Open Space	Criterion 3 of Policy SR.2 is not in accordance with PPG17. PPG17 refers only to the need to show an excess in sports provision and this is different to the need to demonstrate "a clear long term excess of sports provision". The policy refers to excess provision in "the city" whilst PPG17 refers only to "POS in the area". It is unreasonable to expect the loss of playing fields in one area of the city (where there is over provision) to be restricted by an under provision elsewhere in the city particularly when the playing field lost cannot be easily accessed by the resident population in the area where there is currently an under provision of space.	Criterion 3 of policy SR.2 to be amended to read "the local plan shows an excess of sports provision and open space in the area, taking account of the recreation and amenity value of such provision".	The guidance in PPG17 has been applied to local needs and it is considered necessary for criteria 3 of Policy SR2 to take account of the long term demands for sports provision. As Gloucester is a relatively small city, it is also considered appropriate to assess provision city wide rather than just look at the POS in one area. As the city has an overall deficiency in Public Open Spaces, playing fields in one area of the city will be used by other areas.	No change
157	SR.2	3		Playing Fields and Recreational Open Space	Supports Policy SR.2 which is in accordance with Sport England's Planning Policy Objective 6.		Support noted.	

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	SR.3		1	Intensive Use Facilities and Floodlighting	Lighting must be safe for passing motorists.	Insert reference to undue glare being unacceptable.	Agreed, insert reference to the safety of passing motorists	Change text in policy SR3
157	SR.3		3	Intensive Use Facilities and Floodlighting	Supports Policy SR.3 which seeks to ensure proposals for intensive use and / or floodlit will be supported which is in accordance with Sport England's Planning Policy Objective 21.		Support noted.	
66		10.37, 10.38	1	Indoor Sports Facilities	The previous leisure centre on Eastgate could have been repaired and refurbished and the remaining lottery money could have been used to purchase the Whitbread Brewery site for a high future leisure centre in a central location adjacent to the future railway station on the railway triangle.	Acquisition of the Whitbread Brewery site and all railway land including the railway triangle for a massive development for 1000 year life time.	The leisure centre on Eastgate Street needed to be rebuilt to provide a high quality sporting facility for Gloucester. This money has therefore already been spent and the purchasing of the Whitbread site would not be practical.	No change.
163	SR.4		1	Indoor Sports Facilities	They must have good accessibility for non-car access.	Insert reference to enhancement of accessibility.	Noted, the supporting text in paragraph 10.38 refers to accessible locations, and criterion 1 of policy SR.4 refers to designated centres which will be in accessible locations	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
157	SR.4	3		Indoor Sports Facilities	Supports Policy SR.4 providing the positive context within which to assess applications for indoor sports. The level of provision should be determined locally based on local assessments of need and take into account wider than local requirements for certain strategic or specialist facilities.		Support noted, an additional sentence in paragraph 10.38 will refer to the requirement for a needs assessment for proposals for larger indoor sports facilities	Amend paragraph 10.38
157	SR.5	3		Designing for Shared Use	Supports Policy SR.5 which is in accordance with Sport England's Planning Policy Objective 12.		Support noted.	
167	10.41	3		Allotments	QUVL has indicated in its discussions with Quedgeley Parish Council that provision of allotments may be possible if they are in the buffer zone next to the railway and A.38.	None given.	Support noted.	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
147	A.1	1		New Housing and Allotments	The policy sets out another obligation upon residential developers for sites over 30 units or more to pay for the provision of new allotment sites. It may be impractical for a developer to provide this provision on site and therefore it is important to facilitate a system of commuted payments.	Such obligations should be based on actual demand for new allotments reflecting upon local circumstances and no specific figures should be set out in Policy A.1. As with other obligations, it is imperative that a reasonable approach, related to the scale and nature of development is adopted to ensure that such developer obligations do not undermine the financial viability of sites.	Policy A1 does allow for the provision of the payment of commuted sums where the provision of allotments on-site is not feasible. The ratio in Policy A1 reflects the current ratio for provision of allotments. As approximately 82% of allotments are in active use, the current ratio is appropriate and should be maintained.	No change
149	A.1	1		New Housing and Allotments	The policy is onerous. There is no requirement to justify anywhere in national guidance, that such a burden on development is acceptable.	Policy needs to be deleted.	There is no national guidance regarding allotments, but they are important to residents who do not have their own garden and as there is an 82% active use of allotments they are important. The policy aims to retain the existing ratio of allotments to population.	No change
203	A.1	1		New Housing and Allotments	No justification is included for this policy - ie evidence of a shortage of and need for new allotments.	Delete policy.	Disagree, the text justifies this policy by highlighting that it will retain the current ration, without the policy there would be a shortage.	No change.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
217	A.1		1	New Housing and Allotments	The proposal is unsustainable in the context of paragraph 10.44 / Policy A.2 where the Council accepts that existing allotments may be redeveloped.	Non given.	The loss of an allotment site would be specific to a particular circumstance. The loss won't be permitted unless one of the criteria in policy A2 is fulfilled	No change
139		10.42	1		It should be noted that allotments in Upton St. Leonards are generally used by residents from the south of the city. Some recognition of such a role would be helpful particularly if the residents of Upton St. Leonards wish to use their own facilities. Adequate POS provision should be sought in the Abbeymead and Matson areas to serve the city's needs.	Amend para 10.42 to include reference to the role of adjacent communities in providing for the city residents' allotments needs. Propose new allotments to meet the existing city residents' needs.	Disagree, this has not been noted as a current problem. The use of the allotments in Upton St. Leonards could be controlled by other means, such as priority for local residents if they consider it to be an issue	No change

CHAPTER 11 - Community Services

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
68		11.4	2	New Policy - Allocation of Sites for Religious Meeting Places	Against the advice of PPG12 (paras 4.13 to 4.14) the Plan does not make adequate provision for meeting the need for new places of worship within the Plan area including minority religious groups such as Jehovah Witnesses.	The Council recognises the importance of meeting the spiritual needs of the community and should help in providing meeting places. The Council should allocate potential sites for new religious meeting places and help them identify such sites or suitable premises if approached by a religious group.	Disagree. Policy H.1 includes providing for a place of worship at RAF Quedgeley. Policy H.9 permits the change of use of residential properties for uses like places of worship in certain circumstances.	No change
164	CS.1		1	Protection of Community Facilities	Criterion 2 might usefully be redrafted to highlight the importance of alternative locations for community facilities being accessible by a choice of means of transport other than private vehicles.	Amend policy accordingly.	Agree.	Amend policy accordingly
196	CS.1		1	Protection of Community Facilities	Any proposals for new health care facilities could result in existing premises becoming surplus. Although new facilities could be in more accessible locations than existing facilities, this is not always possible.	Amend policy CS.1 to read "2. Alternative provision of equivalent community benefit is provided at an equally or more accessible location".	Agree in part. However, rather than rewriting the criteria , the phrase 'wherever feasible' should be inserted.	Amend policy accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		11.8	1	Land for Community Services in Major New Housing Development	The policy is not clear or specific enough about what is expected from developers in planning obligations contribution towards the provision of community facilities.	Amend policy accordingly to provide clarification.	Agree in part. The text should be amended rather than the policy. The text should explain that Policy H.1 has more details on appropriate community facilities on the large sites.	Amend text accordingly
147	CS.2		1	Provision of New Community Facilities	The principle of such contributions is noted. However, the Council should also provide evidence of actual demand for these facilities.	A reasonable approach related to the scale and nature of development is needed to ensure that such developer contributions do not undermine the financial viability of sites.	Disagree. Paragraph 11.4 explains that the local planning authority and service providers will need to liaise closely to assess the need for community services. Policy ST.14 in the Strategy Chapter explains that developers will be expected to make a reasonable contribution to community facilities that are related to their development proposals	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
162	CS.2		1	Provision of New Community Facilities	The wording of this policy should be expanded to highlight the opportunities associated with major development sites particularly where they are located in close proximity to existing residential areas which suffer from a shortfall in the current level of provision.	Amend policy CS.2 accordingly.	Agree in part. The text should be amended to make it clear that new community facilities are located in accessible centres. However, developer's contributions to community facilities must relate to their development and cannot make up for any shortfall in the current provision.	Amend text accordingly
164	CS.2		1	Provision of New Community Facilities	The policy might usefully be redrafted to highlight the importance of alternative locations for community facilities being accessible by a choice of means of transport other than private vehicles.	Amend policy accordingly.	Agree.	Amend policy accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167	CS.2		1	Provision of New Community Facilities	The policy is not clear or specific enough about what is expected from developers in planning obligations contribution towards the provision of community facilities. Reference should be made to Circular 1/97.	Amend policy accordingly to provide clarification.	Disagree. The policy needs to be flexible so that it can cover changing circumstances. Policy ST.14 in the Strategy Chapter explains that developers will be expected to make a reasonable contribution to community facilities that are related to their development proposals	No change
196	CS.2		3	Provision of New Community Facilities	The provision of appropriate community facilities, such as health centres, or financial contributions towards such facilities, is important to meet the needs of future occupiers of new residential developments.		Note support	No change
196		11.12 to 11.15	2	Developer Contributions for Health Care	There is no specific policy seeking developer contributions to Health Care facilities i.e. an equivalent policy to CS.11 for Education.	Include a policy on developer contributions for Health Care.	Agree. This should be referred to in Policy CS.6.	Amend Policy CS.6 accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
196	CS.5	1		Protection of Health Care Facilities	Any new proposals for health care facilities could result in existing premises becoming surplus although new facilities could be in more accessible locations than existing facilities, this is not always possible. Furthermore, although such facilities would often be better located in or adjacent to a designated centre this will not always be possible and may be best located in residential areas which is acknowledged in the text and policy.	Amend policy CS.5 to read "3. Alternative provision of equivalent health care facilities is provided at an equally or more accessible location".	Agree in part. However, rather than rewriting the criteria , the phrase 'wherever feasible' should be inserted.	Amend policy accordingly
15	CS.6	2		Provision of New Health Care Facilities Site 10 Grange Road Infants School	There is a need for a doctor's surgery on this land because the nearest is at either Quedgeley or Stroud Road.	Make allocation for doctor's surgery.	Disagree. A doctor's surgery has ben approved nearby on land off Tuffley Lane. Another one is not needed on this site.	No change
195	CS.6	2		Allocation of land for a doctor's surgery	There is a need for the Grange Road school site to be allocated as a Doctors / Health Care Surgery.	Include an allocation for a Doctors / Health Care Surgery on the Grange Road school site.	Disagree. A doctor's surgery has been approved nearby on land off Tuffley Lane. Another one is not needed on this site.	No change

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	CS.7		1	Change of Use of Dwellings to Residential Institutions	Criterion 1 lacks clarity in that it fails to define or provide adequate guidance as to the size (e.g. no. of rooms) of properties suitable for conversion to residential institutions. The wording "too large for single family occupation" is vague and needs redrafting. The policy should also include a criterion making reference to the need to provide an appropriate amount of amenity space.	Amend policy accordingly.	Agree. The size of the property should refer to five bedrooms or more. The need for an appropriate amount of amenity space should also be included.	Amend policy accordingly
163		11.17	1	Education	Inaccurate text. Education is provided by a number of schools and colleges, maintained by Gloucestershire County Council and the Gloucestershire Learning and Skills Council.	Amend text accordingly.	Agree.	Amend text accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163		11.19	1	Education	Given existing demographic projections it is unlikely that the criteria for a new 8 form entry secondary school could be met. The disposition of existing places within the city is acknowledged and the County Council are happy to work in partnership with the City Council to improve this situation. Post 16 Provision is a joint issue for the County Council and the new Gloucestershire Learning & Skills Council who are developing a policy for post 16 provision across the Council and this omission should be corrected.	Amend text regarding the 8 FE school and Post 16 provision accordingly.	Agree in part. The text should refer to the County and the Gloucestershire Learning and Skills Council developing the policy. However, whilst acknowledging that it is unlikely that the criteria for a new 8 form entry secondary school could be met, the City council still remains very keen to work towards this objective.	Amend text accordingly
163		11.20	3	Education	Support references to Learning City Gloucester. However, it was the County Council who led the partnership which achieved an EAZ for Gloucester.	Amend text accordingly with reference to partnerships.	Agree.	Amend text accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
164	CS.8		1	Change of Use of Dwellings to Day Nurseries and Playgroups	The policy is too inflexible in that it restricts changes of use of this nature to detached dwellings. Other types of properties e.g. semi detached may be equally as appropriate provided that they meet the stipulated criteria.	Amend policy accordingly.	Agree. However, text should confirm that converting detached properties is to be preferred.	Amend text and policy accordingly
212	CS.9		1	Land Reserved for Primary Schools (The Wheatridge)	The allocation should be deleted because there is no need for a primary school in this location. The site has been reserved for over 20 years and there is sufficient capacity in current schools to accommodate needs. The County Council should be asked to confirm that this valuable wasted asset can be released for beneficial use such as housing and open space.	Delete 'The Wheatridge' from the policy.	The site has not been declared surplus buy the Education Authority. In any event it is a greenfield site which would not be required for development this plan period given the results of the urban capacity work that has been undertaken.	No change
191	CS.9		3	Land Reserved for Primary Schools	Supports the allocation for a primary school on land at Clearwater Drive.		Note support. However, should the site not be needed for a school, it could provide useful additional public open space	Amend text accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
66	CS.10		1	The Protection of Higher and Further Educational Facilities	If Gloscat is looking to move from Brunswick Road then it should move to the Oxstalls campus nearer to Cheltenham and new railway stations at the Railway Triangle & Barnwood. The Cheltenham & Gloucester College of Higher Education should be located near Churchdown Station and M5 junction 11.	Gloscat & Glos secondary schools will provide students for the Gloucestershire University that will be able to live at home and travel short distance, many by future local railway network.	Disagree. Gloscat is an important part of the future of the central area	No change
163	CS.10		1	The Protection of Higher and Further Educational Facilities	Education facilities will require excellent non-car accessibility.	Amend text by inserting a reference to need for excellent accessibility.	Agree.	Amend policy accordingly
163		11.26	1	Demand for educational resources	Demographic study show that new housing generates new demand for educational resources.	Amend text in final sentence of 11.26 to read "however where there are housing allocations in most cases it is proven that there will be increased demand for educational facilities".	Agree in part. The relationship between housing allocations and increased demand for educational facilities should be strengthened in the text. However, disagree that there is evidence of proof of this relationship is	Amend text accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
167		11.26	1	Developer contributions for Education	Objection to second sentence as it does not acknowledge the complexity of a situation in which new development will indeed be occupied by households including school age children but where broader demographic trends may result in relatively small increases in overall pupil numbers.	Amend text to give a more detailed explanation of the factors which will affect the demand for school places.	Agree in part. The text should recognise the uncertainties in planning for education facilities. However, disagree that it is necessary to explain the factors that affect the demand for school places.	Amend text accordingly
163		11.27	1	Developer Contributions for Education	The grounds are relevant and demonstrable, developers should contribute by way of planning obligations to fund all the capital costs of provision of new accommodation to meet rising school roles as a result of development.	Amend text of 11.27 to read "Contributions secured by planning obligations will be required to fund the one off capital costs of provision of new permanent and temporary classroom space to meet rising school rolls".	Disagree. The need for developer contributions will vary, and should be assessed at the time that planning applications are made. This should be made clear in the text	Amend text accordingly
147	CS.11		2	Developer Contributions for Education	Such contributions need to be considered against other cost obligations and the County Council should also provide evidence of actual demand for these facilities.		Disagree. The need for contributions should be assessed at the time of the application. This should be made clear in the text.	Amend text accordingly.

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
163	CS.11		1	Developer Contributions for Education	The grounds capacities and relevant Education planning areas continually vary. Assessment of the impact on Educational facilities of each development will be made and contributions sought accordingly.	Developer contributions will be sought where new housing is likely to create demand for school places that cannot be met by appropriate existing and forecast capacities.	Agree.	Amend text and policy accordingly
167	CS.11		1	Developer Contributions for Education	The policy does not reflect the tests that need to be applied to education provision e.g. additional demand, capacity to absorb an increase, what level of facilities are needed, are pupil numbers sufficient to warrant the provision of a new school and at what scale.	Amend policy and justification text accordingly.	Disagree. The policy does not need to specify these tests. However, the proposed amended text should recognise the uncertainties in planning for education facilities. However, disagree that it is necessary to explain the factors that affect the demand for school places.	No change
203	CS.11		1	Developer Contributions for Education	Need to clarify what is meant by 'suitable existing capacity' for the purposes of the operation of this policy.	Amend text by describing how suitable existing capacity is to be assessed.	Agree in part. Policy should be amended so that 'suitable existing capacity' is replaced by 'existing and forecast capacity'. The text should recognise the uncertainties in planning for education facilities.	Amend policy and text accordingly

Ref No	Pol No	Para No	T	Issue	Representation	Changes Seeking	Officers Comments	Recommendation
158			2	Lack of policy concerning provision of new prison facilities	The prison service objects to the Plan as it fails to allocate a site in Gloucester for a new prison, whilst recognising the limited opportunities within the Council area. Paragraph 9 to 12 of circular 3/98 sets out the basic criteria for site selection and the Prison Service acknowledges that they may not always be possible to satisfy them all.	none given	It is not considered that there are any suitable sites within the built up area large enough for a new prison. If a site was to be available we would look at the relocation of the current prison to provide for employment and housing opportunities.	No change