

**SITE ALLOCATIONS AND DESIGNATIONS**  
**(NON-CENTRAL AREA)**

**PREFERRED OPTIONS CONSULTATION**

**AUGUST – SEPTEMBER 2006**

**SCHEDULE OF COMMENTS**



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### **Explanatory Note**

The following schedule details every representation that was made to Gloucester City Council's Site Allocations and Designations (Non Central Area) (Preferred Options) Development Plan Document Consultation of the Local Development Framework, held for six-weeks between 7 August and 18 September 2006.

Please be aware that where gaps exist in detailing representations made to particular policies, proposals or sections of the document, no representations were made.

This schedule does not detail officer comments to these representations. Officers will consider representations in producing the submission version of the Site Allocations and Designations (Non Central Area) document. This is scheduled for June 2008.

A number of other documents were consulted on alongside the Site Allocations and Designations (Non-Central Area) document, and separate schedules have been drawn up for these. These are as follows:

- Central Area Action Plan Development Plan Document
- Greater Greyfriars Planning Brief (Supplementary Planning Document)
- Greater Blackfriars Planning Brief (Supplementary Planning Document)
- Kings Square and the Bus Station Planning Brief (Supplementary Planning Document)
- The Railway Corridor Planning Brief (Supplementary Planning Document)
- Westgate Island and Quay Planning Brief (Supplementary Planning Document)
- Land East of Waterwells Business Park Planning Brief (Supplementary Planning Document)
- Clearwater Drive Planning Brief (Supplementary Planning Document)

Name/ Reference Number	Support/Object/ Comment	Policy/ Section	Comment/Representation/Request Amendment
<b><u>General Comments</u></b>			
<b>0181</b>  <b>South West Regional Assembly</b>	Comment	General Comment made to both CAAP and SAD preferred options documents	<p>The RPB assesses consultations on Local Development Documents (LDDs) on whether the proposal is in 'general conformity' with the Regional Spatial Strategy (RSS). Until the Draft RSS is published, RPG10 is technically the South West RSS. You should be mindful during the development of the LDF that the Draft RSS and its evidence base will carry greater weight the further it goes through the process to publication. As you know the formal public consultation has recently drawn to a close and the EiP is scheduled for April 2007.</p> <p>On the whole I consider that the above documents are well presented and read well. In regard to the Central Area Action Plan I would just like to emphasise a number of key policies in the Draft RSS. Firstly I would like to draw you attention to policy H1: Affordable Housing, which requires at least 30% of all housing development annually across each local authority area and Housing Market Area to be affordable with rates of up to 60% or higher in areas of greatest need. It is important that the needs of the central area are properly reflected in the affordable housing target set.</p> <p>Secondly I would like to refer you to policy H2: Housing Densities of the Draft RSS, which requires "Density of development of housing at the SSCT's should be at least 50 dph and considerably higher in well planned mixed use developments within the existing urban area" (p132).</p> <p>Finally I would like to refer you to policy SI1: Equality Impact Assessment which requires Local Authorities to conduct Equality Impact Assessments to ensure policies reflect the diverse needs and concerns of the people who will be affected by them. We are currently commissioning further work on this matter in order to provide advice to Local Authorities on this.</p>
<b>0200</b>  <b>The Theatres Trust</b>	Comment	General Comment	<p>The Theatres Trust is an advisory Non-Departmental Public Body and a statutory consultee on planning applications that affect land on which there is a theatre. It was established by The Theatres Trust Act 1976 'to promote the better protection of theatres'. Our main objective is to safeguard theatre use, or the potential for such use, but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.</p> <p>Local authorities are required by Government Order to consult the Trust when considering planning</p>

			<p>applications affecting land on which there is a theatre. This applies to all theatre buildings, old or new, and regardless of whether or not they are still in use as theatres, in other uses, or disused.</p> <p>It is not part of The Theatres Trust's remit to comment on site allocations except to provide guidance on the best locations for performance arts in a district that will support and protect sustainable theatre use. The Council should be satisfied that there is adequate provision for cultural facilities (normally within a multi-purpose community building) and that these are in easily accessible locations by public transport and road with adequate parking. It is important to have undertaken a need and impact assessment for cultural provision in the non-central areas as future development of the city suburbs could well include a theatrical provision for community halls or a new arts centre.</p>
<b>0445</b> <b>Environment Agency</b>	Support	General Comment	We generally support the area specific policy designations (policies SAD.1 - SAD.19) as they accord with both the Core Strategy and Development Control Policies document.
<b>0445</b> <b>Environment Agency</b>	Object	Allocations and Strategic Flood Risk Assessment	<p>We are unable to support the site allocations within the identified flood zones 2 and 3, as they have not been informed by a Strategic Flood Risk Assessment (SFRA) or sequential test. As such the allocations not accord with the principles of preferred option Development Control Policy BNE.10.</p> <p>In considering sites for development it must be demonstrated through a flood risk sequential test that no other site is available in a lower flood risk location. Without such a process being already in place at this stage (preferred options) we cannot see how the plan will be declared sound at the examination stage. Currently the plan fails to be consistent with national planning policy (soundness test IV) and is not founded on a robust and credible evidence base (soundness test VII).</p> <p>In view of this lack of a visible sound evidence base as required in the leading SA/SEA process, the Agency has no option but to object to the Preferred Options Central Area Action Plan.</p> <p>As stated in previous responses, paragraph 51 of PPG 25 states that an LPA should show areas at flood risk within the local plan and apply the principles of the sequential test accordingly. The Consultation draft of PPS 25 also identifies within its key planning objectives that LPA's should prepare and implement planning strategies to help deliver sustainable development by preparing SFRA's. These should be 'appropriate either as part of a Sustainability Appraisal or as a free standing assessment that contributes to that Appraisal'.</p>
<b>0942</b> <b>English</b>	Support	Conformity with SO.6 of the CAAP	English Nature welcomes the strong cross-reference throughout this plan for the Non-Central Area to Strategic Objective 6.

<b>Nature</b>			
<b>1366</b> <b>IM Group</b>	Object	Former Rail Freight Terminal Allocation	<p>This objection is to the non-allocation and lack of any proposals for an area of land within the eastern section of the Kingsway Development (formerly RAF Quedgeley) and north of Naas Lane, which abuts directly onto the railway to the east.</p> <p>Paragraph 4.247 of the preferred options consultation paper states that the former rail freight terminal proposal for this site will now not happen. However, it is not clear what the intentions of the City Council are now in terms of land allocations for this area of land.</p>
<b>1445</b> <b>Gloucestershire County Council</b>	Object	Archaeological Significance of Allocations	<p>There are currently no comments on the archaeological significance of any of the allocated sites. In order that archaeological issues affecting development are raised at the earliest possible opportunity it is recommended that the archaeological significance of the allocated sites is considered and an indication given in the LDF as to their potential and the requirements on developers.</p>
<b>1455</b> <b>Friends, Families And Travellers</b>	Comment	General Comment	<p>FFT is a national charity concerned with issues relating to Gypsies and Travellers. I have recently been appointed as Planning Officer to work with councils regarding the implementation of the new Government Planning Circular 1/2006 which, if implemented properly and expeditiously, should go a long way to meeting the dire and urgent need for appropriate accommodation for this marginalized group.</p> <p>Their accommodation needs have been ignored for many years in many places and the situation has grown worse over the past 12 years since the repeal of the duty on local authorities to provide sites and following the issue of revised Government planning guidance in 1994. In the context of national and local housing needs and projected development this is a very small issue indeed which should be easy to solve given the necessary goodwill and determination by local authorities to meet accommodation need.</p> <p>The Government has now issued a revised planning circular (1/2006) and a guidance into carrying out Gypsy and Traveller Accommodation Assessments (GTAA's) (ODPM Feb 2006). The assessment of Gypsy and Traveller accommodation needs is a statutory requirement under s.225 of the Housing Act 2004. We would commend the recently published Cambridge Sub-Region Traveller needs assessment carried out by Professor Robert Home and Dr Margaret Greenfields (see Cambridge County Council website) as a model of good practice and community involvement. For general guidance you may find it helpful to look at the website of the Gypsy and Traveller Law Reform Coalition which sets out advice on Gypsy and Traveller accommodation needs and the new planning system (<a href="http://travellerslaw.org.uk/press.htm#advice160305">http://travellerslaw.org.uk/press.htm#advice160305</a>). The new circular was in response to the</p>

		<p>failure of a previous planning circular and a recognition that research has confirmed the link between the lack of good quality sites and poor health and education and employment opportunities for this group. It also states that priority setting is the responsibility of local authorities with the national framework provided by government.</p> <p>This framework includes the aim:</p> <p>'to increase significantly the number of gypsy and traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3-5 years'.</p> <p>It also indicates that transitional arrangements should be put into place in advance of the completion of GTAA's and that where there is pressing need local planning authorities should bring forward DPD's containing site allocations in advance of regional consideration of pitch numbers (p 11-12 Circular 1/2006). I quote from that section: 'Where there is clear and immediate need... local planning authorities should bring forward DPD's containing site allocations in advance of regional consideration of pitch numbers, and the completion of the new GTAA's.'</p> <p>Transitional arrangements should be put into place without delay.</p> <p>FFT has become concerned about the depth and quality of consultation by many local authorities during the development of Core Strategies, LDF's and DPD's. Whilst we are pleased to comment as far as we are able on developing local documentation we are of the opinion, as I am sure a Planning Inspector would agree, that consultation of national organisations over local issues is not sufficient. I would ask what steps you have taken to engage with local groups and the local Gypsy and Traveller community. We are also concerned about the general lack of race equality impact assessments (REIA) in the planning process and ask what steps you have undertaken or are planning to undertake to ensure that a REIA is made and subsequent monitoring carried out. The ODPM has made clear that race equality should be at the heart of the planning process if it is to provide quality services that meet the needs of all groups in the community.</p> <p>I have to hand your documents out for consultation ( Central Area Action Plan, Planning Briefs) and cannot find any mention of Gypsy and Traveller accommodation in them.</p> <p>We note that the ODPM caravan counts do register unauthorised camping in your council area. This is evidence of need for those that resort to Gloucester City. I ask what provision you have made or plan to make within your plans to meet their accommodation needs.</p>
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**Policy SAD.1 – Public Open Space and Private Playing Fields**

**Paragraphs 3.3 – 3.12**

<p><b>0171</b> <b>Bovis Homes Limited</b></p>	<p>Object</p>	<p>Policy SAD.1 – Public Open Space and Private Playing Fields</p>	<p>The importance of open space within the non-central area is noted.</p> <p>The protection of all areas of open space is an inflexible approach. Open space should only be safeguarded if there is a demonstrable shortage of open space within the non-central area. This should be informed by an up-to-date open space assessment.</p> <p>If there is a shortage of open space in the area then existing open spaces should be safeguarded unless:</p> <ol style="list-style-type: none"> <li>1. The proposed development provided a like-for-like replacement within the local area</li> <li>2. Funds are made available to improve the quality of the open space within the Central Area</li> <li>3. Better use of the open space is provided.</li> </ol> <p>We recommend that the policy be amended to take into consideration the above comments.</p> <p>Regardless, the policy appears to replicate Policy LR.1 and we question whether this is required.</p>
<p><b>0184</b> <b>Hempsted Residents Association</b></p>	<p>Support</p>	<p>Policy SAD.1 – Public Open Space and Private Playing Fields</p>	<p>The association fully supports the policy. As far as possible, open space should be maintained as working farmland thus meeting the objective of linking town and country. The land adjacent to the river between the river and the canal provides an ideal area for walking, horse riding, nature trails etc.</p>
<p><b>1016</b> <b>Mr K M Keates</b></p>	<p>Support</p>	<p>Paragraphs 3.9 – 3.10</p>	<p>Support</p>
<p><b>1016</b> <b>Mr K M Keates</b></p>	<p>Object</p>	<p>Policy SAD.1 – Public Open Space and Private Playing Fields</p>	<p>The Proposals Map does not appear to include play area and playing field south of the Gordon League Rugby Football Ground, west of the Southern Radial Route, Hempsted. These should be added to the Proposals Map to ensure their protection under Development Control Policy LR1. The second paragraph of SAD1 is supported.</p>
<p><b>1016</b></p>	<p>Support</p>	<p>Paragraphs 3.3</p>	<p>Paragraphs 3.3 – 3.8.</p>

<b>Mr K M Keates</b>		- 3.8	
<b>0942</b> <b>English Nature</b>	Comment	Policy SAD.1 – Public Open Space and Private Playing Fields	English Nature is of the view that the policy should be cross-referenced with Policy BNE.1: Nature Conservation and Biodiversity and Core Policy 8: Protection and Enhancement of the Built and Natural Environment. Public Open Space plays a key part in delivering the Government's target of ensuring that everyone lives within 300 metres of a greenspace. The definition of greenspace is 'land, water and geological features which have been naturally colonised by plants and animals which are accessible on foot to a large number of residents'.
<b>1486</b> <b>Theresa Batchelor</b>	Support	Policy SAD.1 – Public Open Space and Private Playing Fields	Support. However it would be beneficial for residents of the City and visitors is other green areas specifically those in Podsmead, Matson, Tuffley, Linden and Saintbridge and all other school playing fields and grassed areas could be protected from further housing or industrial development in the future.
<b>1492</b> <b>Kayterm Plc</b>	Support	Policy SAD.1 – Public Open Space and Private Playing Fields	Kayterm considers that accessibility to public open space is important. We have no objection to this policy, so long as it applies only to those open spaces and playing fields that are designated on the preferred options proposals map (August 2006).

### **Policy SAD.2 – Landscape Conservation Area Boundaries**

#### **Paragraphs 3.13 – 3.24**

<b>0383</b> <b>Boyer Planning Limited</b>	Object	Policy SAD.2 – Landscape Conservation Area Boundaries	<p>Reiterate earlier objection concerning the retention of landscape conservation areas. The Council has not properly considered this matter in light of previous representations made (Report by David Jarvis Associates 1999 submitted alongside). Further response to Green Issues Paper prepared by David Jarvis Associates 2000 also submitted. The reports demonstrate that land at Winneycroft Farm does not warrant the landscape conservation area designation.</p> <p>On the assumption that the Council intends to persist with the concept of Landscape Conservation Areas in the LDF it is essential that the Council should critically review the boundaries of the areas to be included within the designation. Land at Winneycroft Farm should be omitted.</p>
<b>0171</b>	Object	Policy SAD.2 –	This is a very restrictive policy. The Council should not identify Landscape Conservation Areas. This

<b>Bovis Homes Limited</b>		Landscape Conservation Area Boundaries	<p>approach is not supported in National or Regional Planning Policy. Recent Government advice has tried to deter local authorities from identifying local landscape designations.</p> <p>This policy is to be contrary to National and Regional Planning Policy, in particular the recent Government advice.</p> <p>We fail to see how the proposed policy relates to the overarching aims of National and Regional policy and request that it is deleted.</p>
<b>0184 Hempsted Resident's Association</b>	Support	Policy SAD.2 – Landscape Conservation Area Boundaries	The association fully supports the policy.
<b>1016 Mr K M Keates</b>	Support	Paragraphs 3.13 – 3.15	Support
<b>1016 Mr K M Keates</b>	Object	Paragraph 3.16	<p>Whilst the general strategy for protection of LCA's is supported I am concerned that reference to allowing development in LCA's if 'it can be demonstrated that no other suitable sites outside the LCA are available' weakens the policy and will attract numerous planning applications for development, particularly housing development, claiming that no other sites are available.</p> <p>In terms of the LCA at Hempsted it plays a critical role in separating the historic village of Hempsted from the rest of the City and there is no possibility of there being any suitable compensatory measures if it were developed. If the land which separates the village from the City were developed there would no longer be a village.</p> <p>Reference to demonstrating that no other sites are available should be deleted from para 3.16 and appropriate amendments made to policy BNE4.</p> <p>In addition reference should be made to the the Landscape Assessment which identified and justified the LCA's and is referred to in para 5.26 of the Development Control Policies Preferred Options Consultation Paper, perhaps in para. 3.14</p>
<b>1016 Mr K M</b>	Support	Paragraphs 3.23 – 3.24	Support for Council's approach in designating LCA's. This is particularly important within or adjacent to large urban areas where small parcels of land may not form part of a wider rural landscape but which serve other very important functions such as contributing to the character of a City or separating

<b>Keates</b>			<p>built development. This is set out in the 1997 Landscape Re-Assessment of Gloucester (LRAG). Without identifying these LCA's a criteria based policy would need to ensure no harm in terms of the four criteria set out in para 3.14 of the current preferred options paper.</p> <p>In addition as the village of Hempsted is clearly part of the setting of the City (para 2.20 of the LRAG) it is important to retain its special character and separate village identity and any criteria based policy would need to address this issue. The Planning Inspector at the 1993 Local Plan Inquiry recognised the special character of Hempsted in his report of objections and I would refer you to paras 6.2.21 and 6.3.47 of that report.</p>
<b>1016</b> <b>Mr K M Keates</b>	Support	Policy SAD.2 – Landscape Conservation Area Boundaries	Support for the areas designated at Hempsted as shown on the Proposals Map. Support for policies being determined in accordance with draft policy BNE4 subject to comments made under my objection to paragraph 3.16.
<b>1380</b> <b>Redwood Care Homes Limited</b>	Object	Paragraph 3.16	<p>The designation of Landscape Conservation Areas in Gloucester is unnecessary and contrary to national planning guidance. All LCA designations should be deleted.</p> <p>Guidance in PPS7 is that local landscape designations should only be maintained where it can be clearly shown that criteria based policies cannot provide the necessary protection. Any such designations should be based on a formal and robust assessment of the qualities of the landscape concerned.</p> <p>The Council indicate that a criteria based policy, BNE.4, is included in their development control policies LDD. This policy is designed to provide guidance on landscape matters for all developers. In the light of this, we fail to understand why a further policy designating local landscape areas is necessary. No evidence has been produced by the Council to indicate why the criteria-based policy alone is not sufficient to give adequate protection to the City, and there has been no formal and robust assessment of the landscapes covered by the designation. The policy therefore fails to meet with the requirements of PPS7. Furthermore, paragraph 3.16 states 'New development in a Landscape Conservation Area will only be permitted in exceptional circumstances'. This is not a criteria-based approach, but a statement which would prevent almost all development beyond the built up areas. It is wholly unreasonable.</p>
<b>1443</b> <b>Brasenose College</b>	Object	Policy SAD.2 – Landscape Conservation Area Boundaries	We note that PPS7 sets out the Government's preference for criteria-based policies in LDD's in conjunction with landscape character assessment. PPS7 states that these should provide sufficient protection for areas of highly valued landscape that are outside of nationally designated areas. It states that there should not be a need for rigid local designations that may unduly restrict acceptable, sustainable development and vital economic activity. PPS7 states that local landscape designations

			<p>should only be maintained, or exceptionally extended, where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. It states that when reviewing their local area-wide development plans and LDD's, planning authorities should rigorously consider the justification for retaining existing local landscape designations.</p> <p>In line with national planning policy, we consider that a landscape character assessment approach would provide a more appropriate way of protecting the physical assets of Gloucester and the countryside surrounding the City, rather than local designations. We therefore consider that Draft Policy SAD2 and the associated designations on the Proposals Map should be deleted, with Development Control Policy BNE4 reworded to adopt the Government's preferred landscape character assessment approach. Policy BNE4 should also include an appropriate level of flexibility so that it does not unduly restrict acceptable, sustainable development and vital economic activity.</p>
<p><b>1452</b></p> <p><b>Sylvanus Lyson's Charity</b></p>	Object	<p>Policy SAD.2 – Landscape Conservation Area Boundaries</p>	<p>Objections were raised to the inclusion of this land within the Landscape Conservation Area designation at the Issues and Options stage.</p> <p>The City Council will be well aware that the site was proposed for Landscape Conservation Area status during the preparation of the adopted Local Plan and, following objections by the Hempsted Landowner's Consortium, was not considered by the Inspector to fulfil the Council's own criteria for the designation of such areas. Unfortunately, without due justification, the Landscape Conservation Area designation was included in the current adopted Local Plan.</p> <p>The Charity therefore, in light of the previous Inspector's recommendation and the fact that there has been no material change in circumstances affecting the intrinsic landscape quality of the area, is disappointed that the City Council has continued to propose this area as a Landscape Conservation Area at the Issues and Options stage and now at Preferred Options stage. It is noted in response to this objection that the Council has justified its decision to designate this area as a Landscape Conservation Area based on specialist external advice by consultants. An extract from the consultants study was requested from the City Council but was not received before the deadline for the submission of representations. RPS Planning therefore reserves the right to make further representations on the Landscape Conservation Area designation of the site if necessary if additional information is received.</p> <p>The Charity considers that the designation of this land as part of the Landscape Conservation Area is wholly inappropriate and requests that the Council reconsiders its decision. The Landscape Conservation Area designation on the land should be deleted from the Preferred Options document.</p> <p>Authorities have been cautioned continuously by Government against the unjustified imposition of</p>

			<p>additional development control policies with a view to defending sites against development pressure when there are sufficient policies in place at Central, Regional and Local Plan level to resist inappropriate development at inappropriate times. In this case, it is apparent that the LCA at Hempstead is not justified, fails to fulfil appropriate criteria and should be deleted from further documentation leading to the adoption of the new Local Development Framework.</p> <p>The City Council has also included the site within the Prime Biodiversity Area even though it does not figure as a Site of Nature Conservation Interest or a Site of Special Scientific Interest in either the adopted Local Plan or in the LDF. The primary justification for the designation appears to be that the area is integrally associated with the wider area identified to the east of the River Severn. This is wholly misplaced since the area concerned is contained by development on virtually all sides, is detached from the wider eastern edge of the Severn and has a completely different character from that area.</p> <p>The area in question is an area of improved pasture surrounded by development which is subject to significant trespass and in no reasonable terms could be concluded to be a Prime Biodiversity Area. Whilst the Council contends in paragraph 3.47 of the Preferred Options that the PBA defined is a strategic corridor along the Severn which is fundamental for the migration of species, the area of land controlled by the Charity has no known function for such a purpose for the reasons given above. It is the view of the Charity that the PBA designation in this case is simply being used to protect a site which is suitable for development in all other respects without adequate justification.</p> <p>It is noted that the Council's considers that important views of Robinswood Hill would be lost if the site was developed. However, this is on the basis that the site is currently open in character with unrestricted views across the site towards Robinswood Hill. This situation could change considerably if trees and/or hedgerows were to be planted particularly along the Hempsted Road frontage where the nature of view and line of sight is such that any such planting would wholly screen views to Robinswood Hill and the AONB when less than three metres tall. Even the replacement of current open estate fencing with close-boarded fencing would have a significant impact on the sense of openness from the road. I am not aware of the existence of any development control powers that would prevent a landowner from planting trees or hedgerows in a Landscape Conservation Area.</p>
<b>1499</b>	Object	Policy SAD.2 – Landscape Conservation Area Boundaries	<p>Object to inclusion of land south of Grange Road as a Landscape Conservation Area. There is no need for the designation. Local designations should only be maintained where criteria-based policies cannot provide the necessary protection. The document does not explain why the designation is necessary. Furthermore the methodology employed in delineating the LCA's is insufficiently robust. Two of the criteria are flawed and do not serve the purpose of protecting areas of high landscape quality. Unclear why land 'visible from a major transport route' is a reason to protect the land. Also</p>

			<p>inappropriate to simply bring forward designations from the County Structure Plan without reassessing their role and function. To do so is contrary to national policy set out in PPS7. The designation is unsound as it is not based on a robust and credible evidence base. If the policy is retained, the purpose and specific areas designated must be reviewed and evidence made available for testing through the examination process.</p> <p>Also object on a site-specific basis to the inclusion of land south of Grange Road within the designation. A detailed landscape character assessment has been undertaken which concludes that the land in this location is of poor landscape quality and could be considered for development.</p> <p>Policy SAD2 and supporting text should be deleted.</p>
<b>1492</b> <b>Kayterm Plc</b>	Object	Policy SAD.2 – Landscape Conservation Area Boundaries	<p>As set out in previous representations, Kayterm would draw the Council's attention to the Government's policy on landscape designations, as contained in PPS7, Sustainable Development in Rural Areas (2004). In particular, we note that PPS7 sets out the Government preference for criteria-based policies in LDD's in conjunction with landscape character assessment. PPS7 states that these should provide sufficient protection for areas of highly valued landscape that are outside of nationally designated areas. It states that there should not be a need for rigid local designations that may unduly restrict acceptable, sustainable development and vital economic activity. PPS7 states that local landscape designations should only be maintained, or exceptionally extended, where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. It states that when reviewing their local area-wide development plans and LDD's, planning authorities should rigorously consider the justification for retaining existing landscape designations.</p> <p>In line with national planning policy, Kayterm considers that a landscape character assessment approach would provide a more appropriate way of protecting the physical assets of Gloucester and the countryside surrounding the City, rather than local designations. We therefore consider that draft policy SAD.2 and the associated designations on the proposals map should be deleted, with Development Control Policy BNE.4 reworded to adopt the Government's preferred landscape character assessment approach. Policy BNE.4 should also include an appropriate level of flexibility so that it does not unduly restrict acceptable, sustainable development and vital economic activity.</p>
<b>1503</b> <b>Taylor Woodrow Developments</b>	Object	Policy SAD.2 – Landscape Conservation Area Boundaries	<p>Object to the use of this local designation. In line with Government policy it would be more appropriate to use a character assessment approach. Policy SAD2 should be deleted and the designation removed from the Proposals Map. Relevant policies in the Development Control Document should be amended accordingly.</p>

**Policy SAD.3 – Greenbelt**

**Paragraphs 3.25 – 3.35**

<b>0686</b> <b>Mr &amp; Mrs Wilson</b>	Object	Policy SAD.3 - Greenbelt	Support designation of this land as greenbelt.
<b>0138</b> <b>Mrs M Hill</b>	Support	Policy SAD.3 - Greenbelt	Strongly support the proposal which will help preserve this land for future generations. Gloucester already has plenty of development sites available. To use this land for anything else would be a sad loss.
<b>0265</b> <b>R J G Winstone</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land as greenbelt.
<b>0383</b> <b>Boyer Planning Limited</b>	Object	Policy SAD.3 - Greenbelt	<p>Strongly object to this policy and specifically the inclusion of land at and in the vicinity of Winneycroft Farm. The proposal relies on a proposal in the draft Regional Spatial Strategy. Unless or until this proposal is confirmed in the approved version of RSS10 there is no strategic policy basis for the City Council's proposal. The draft policy in RSS10 is itself subject to considerable objections including to the effect that it is not justified on the basis of the test of exceptional circumstances set out in national policy.</p> <p>In addition, the Council's proposal is far more wide-ranging than envisaged by draft RSS10. Land at Winneycroft Farm cannot be interpreted as lying south of Gloucester - it lies to the southeast.</p> <p>The Council has not provided any justification for the specific greenbelt boundaries it now proposes. Such justification is essential in the context of the exceptional circumstances required under national policy.</p> <p>The Council's green belt proposal is wrong as a matter of law and procedure and should be withdrawn for proper consideration following and subject to the outcome of RSS10.</p> <p>Without prejudice to the above, any proposals for additions to the greenbelt at Gloucester should exclude land in the area of Winneycroft Farm because it does not fulfil any of the five greenbelt</p>

			objectives set out in national policy.
<b>0171</b> <b>Bovis Homes Limited</b>	Comment	Policy SAD.3 - Greenbelt	<p>The Council should identify Greenbelt land which is safeguarded for future development. If the local authority falls behind with the delivery of housing or employment land this land could then be used to meet the short-term development requirements.</p> <p>The identification of a safeguarded site should be undertaken through a review of the Green Belt and this would ensure that the Council meet RSS development requirements.</p>
<b>0283</b> <b>E W Banks</b>	Support	Policy SAD.3 - Greenbelt	<p>This appears to be a most sensible decision for this particular area. In view of the restriction by the railway bridge and the fact that Grange Road has become a rat-run by local residents and workers of the local area.</p> <p>May I suggest that you work with your colleagues at Stroud and Gloucestershire Council's to get agreement that the next two fields adjoining bordering the west of Grange Road should also be designated greenbelt. This would, with Whaddon Green, both sides of Stroud Road (B4072), link up with areas to the south of Robinswood Hill. This would greatly enhance the amenity use of the whole south and southwestern area.</p>
<b>0399</b> <b>Cheltenham Borough Council</b>	Object	Policy SAD.3 - Greenbelt	<p>The document acknowledges that land north of Gloucester will be released from the greenbelt in order to allow for new urban extensions yet there is no indication that this has been done. Policy SAD3 refers to greenbelt south of Gloucester only.</p>
<b>0629</b> <b>Robert Hitchins Limited</b>	Support	Policy SAD.3 - Greenbelt	<p>Support the identification of new areas of Greenbelt to the south of Gloucester. Development in these locations would lead to urban sprawl and result in development in an unsustainable location compared to the proposed north of Gloucester extension.</p>
<b>0822</b> <b>Mr Millington</b>	Support	Policy SAD.3 - Greenbelt	<p>Support designation of land to south of Gloucester, including Robinswood Hill, as green belt.</p>
<b>1146</b> <b>Highways Agency</b>	Support	Policy SAD.3 - Greenbelt	<p>The Agency welcomes the retention of the Green Belt to the south of Gloucester as we consider that the majority of additional development within the City should be focussed within the existing settlement boundary. We consider that this can be achieved through the more efficient use of previously developed land and the implementation of mixed-use high density development.</p>
<b>0942</b> <b>English</b>	Support	Policy SAD.3 - Greenbelt	<p>English Nature supports this policy, in particular its cross-reference to policy BNE.1 and Core Policy 8. It would however, be worth nothing that these two policies could also help the Council to achieve Policy BNE.3: Wildlife Corridors, Greenbelts, and allocated Prime Biodiversity Areas. It will form vital</p>

<b>Nature</b>			'routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment', as recommended in PPS9 - Biodiversity and Geological Conservation.
<b>1380</b> <b>Redwood</b> <b>Care Homes</b> <b>Limited</b>	Object	Policy SAD.3 - Greenbelt	<p>We object to the proposal for the designation of a Green Belt to the south and south west of Gloucester. It is unnecessary and contrary to national planning guidance. If, however, a green belt in considered appropriate, we object to the proposal to include the land identified on the attached plan within it. The land does not meet the purposes set out in PPG 2 for including land within the Green Belt and should therefore be excluded.</p> <p>Paragraph 2.7 states 'Where existing Local Plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision'. Whilst recognising that the Structure Plan and Local Plan are no longer appropriate references, these can be replaced with references to Local Development Documents and Regional Spatial Strategies. This means that if an approved RSS indicates that there should be a change to an existing Green Belt boundary then one should be introduced. If there is no approved RSS or Structure Plan then exceptional circumstances must exist for a Greenbelt alteration to be acceptable.</p> <p>Work is underway on the preparation of a new RSS for the south-west, but as yet is has not been approved and the current Gloucestershire Structure Plan does not propose alterations to the Green Belt around Gloucester. As such it is necessary for exceptional circumstances to exist for a revision to the Green Belt to be acceptable. The Council have failed to indicate that such exceptional circumstances exist (and we would conclude that they do not) and thus the proposal to designate a significant area of land as Green Belt to the south and south-west of Gloucester does not comply with PPG2 and should therefore be withdrawn.</p> <p>If however, the decision is taken that the designation of a new area of Green Belt is appropriate, then the land identified on the attached plan should not be included within it. The site comprises a large nursing home, converted from a single dwelling and significantly enlarged, with extensive gardens and a small disused field. It appears that the two Listed buildings with planning permission for conversion to residential use which lie within the site are excluded from the proposed Green Belt, although the draft proposals map does not make the matter entirely clear. The majority of the land is previously developed, and it is accessed directly from Stroud Road. The site is bounded on three sides by existing residential development, and by Robinswood Country Park on the fourth.</p> <p>The guidance in paragraph 2.8 of PPG2 is that where detailed Green Belt boundaries have not yet been defined it is necessary to establish boundaries which will endure. They should not include land which is unnecessary to keep permanently open and should not be so tightly drawn so as to risk</p>

			<p>encroachment to accommodate future development, which may make it impossible to maintain the degree of permanence expected with Green Belts. Furthermore, all areas proposed for designation as Green Belt should accord with the five purposes of incorporating land within the Green Belt.</p> <p>The boundary for the Green Belt in the Stroud Road area is proposed to be drawn tightly around the existing residential properties meaning that there will be almost no opportunity for future development in this area. The Council have failed to look beyond the end of the current plan period to identify whether sufficient land is available for future development. If insufficient land is available then Green Belt releases would almost certainly be needed. The proposed Green Belt boundary is therefore unlikely to endure if drawn as currently proposed. This is contrary to the aforementioned guidance in PPG2. The guidance also indicates that the boundaries of the Green Belt should be easily identifiable, following roads, streams, belts of trees or woodland edges. The most enduring boundary in the Stroud Road area is the edge of Robinswood Country Park, a designation which already prevents almost all development and therefore maintains the openness of the area. The use of the edge of the Country Park as the edge of the Green Belt would accord with PPG2 and would, because of its very nature, result in a permanent, enduring boundary.</p> <p>There are other reasons for not including the land outlined in red in the Green Belt. Firstly, further development in this location would not result in the unrestricted sprawl of a large built-up area. The majority of the land is already developed and additional development within the site would not therefore enlarge the developed area in this location. A limited amount of additional development in this location would not result in towns merging. The intensification of development would not safeguard or otherwise the surrounding countryside from encroachment. As previously stated, the presence of the Country Park achieves this aim. Making better use of the site would not have any effect on the setting or special character of the more historic parts of the City. Finally, this site is urban land. It is previously developed. Including it within the Green Belt would prevent it from assisting in urban regeneration, contrary to the purpose of including land within the Green Belt.</p> <p>Overall, the land in question is previously developed land which is not currently open and which does not meet any of the purposes of including land within a Green Belt. The more enduring boundary in this location is the edge of Robinswood Hill Country Park and if it is felt appropriate for a Green Belt to be designated at the current time, that would be the most enduring boundary.</p>
1425 Rev Dr Jeni Parsons	Support	Policy SAD.3 - Greenbelt	<p>St Katharine's Church Matson, of which I am Rector, comes within this area identified as potential greenbelt. I am satisfied with this designation - it makes good sense for the people of Matson to have some assurance about their highly valued green space both on the Hill and also at Sneedhams Green. I notice your map doesn't show the very dense development on the corner of Juniper Avenue and Matson Lane which comes within the greenbelt area.</p>

<b>1448</b> <b>Gloucestershire County Council</b>	Support	Policy SAD.3 - Greenbelt	Policy SAD3 is fully supported. It should be amended as the wording 'maintained' implies that there is already a green belt to the south of the City which is currently not the case.
<b>1457</b> <b>Mr Brian G Pollard</b>	Support	Policy SAD.3 - Greenbelt	Support designation of this area as greenbelt.
<b>1463</b> <b>Mrs J Padam</b>	Support	Policy SAD.3 - Greenbelt	Support. Long-overdue.
<b>1396</b> <b>Mr Mike Smith</b>	Support	Policy SAD.3 - Greenbelt	<p>I strongly support the proposal to designate Robinswood Hill and adjacent land as green belt. However, the proposed green belt boundaries do not seem sufficient to me.</p> <p>While the proposed green belt quite rightly tightly abuts the houses on the SE side of Forest View Road, protecting the field behind from development, the boundary then runs up through the golf course before running down to the M5. A more logical boundary would be to follow the line of the brook that runs approximately ENE from the M5 to cross the Stroud road adjacent to Grange Road, or indeed to encompass Whaddon to prevent it being absorbed into Gloucester. Presumably the line chosen reflects the administrative boundary between Gloucester and Stroud.</p> <p>Are you taking steps to ensure that land on the other side of this boundary receives equivalent protection?</p>
<b>1456</b> <b>Mrs G L Gutteridge</b>	Support	Policy SAD.3 - Greenbelt	With reference to the land south of Grange Road being designated as Green Belt, I totally agree with this proposal.
<b>1482</b> <b>Miss S Padam</b>	Support	Policy SAD.3 - Greenbelt	Support the identification of this area as greenbelt.
<b>1483</b>	Support	Policy SAD.3 - Greenbelt	We fully agree and support the proposal that the area outlined in the plan sent with the letter be designated as green belt. What does concern us is that there is a possibility that the said area could

<b>A &amp; J H Simmons</b>			<p>be designated for other development i.e. building.</p> <p>The residents in our area are all fully aware that the owner of 70 Forest View Road has bought that property for the purpose of demolition to enable the construction of an access road for access to his field on which it is planned to build a housing estate. The only access to and from the field would be into Forest View Road and Woods Orchard Road - neither of which are suitable for the traffic density that would ensue if the development actually took place. Neither of these roads would be suitable for the heavy lorries that would use them to access the site.</p> <p>We therefore fully support the designation of Robinswood Hill as a greenbelt area. What does surprise us is that when we purchased our property in 1977 searches indicated that Robinswood Hill and the fields adjacent as outlined on your plan were designated greenbelt land and could not be developed. We specifically asked the question at the time as our property is immediately adjacent to the existing footpath onto the fields and hill. Had we been informed that the hill and fields were not designated greenbelt land and could therefore be developed at a later date, it is probable we would not have purchased number 41.</p> <p>Please designate Robinswood Hill and the adjacent fields greenbelt so that no further development can take place.</p>
<b>1399 Dale &amp; Tracey Mather</b>	Support	Policy SAD.3 - Greenbelt	We are in favour of the proposal to designate land to the south of Gloucester including Robinswood Hill as green belt.
<b>1424 Mr Roger Fenton</b>	Comment	Policy SAD.3 - Greenbelt	<p>Thank you for your letter concerning the proposed Green Belt around Robinswood Hill etc, and for asking for my views. Unfortunately, I can't give them to you, as you don't tell us what it will mean. Also, the line delineating the proposed area is something like sixty or seventy feet thick, if we scale it up, so who knows exactly how it might affect peoples' properties etc?</p> <p>My received understanding is that a Green Belt is an area of land which cannot be built on, but I have no idea whether this view accurately reflects reality or not! I can't imagine most people have an accurate idea either. How can I, or any of the other people you will presumably have sent this letter to, possibly comment on something we have little knowledge about?</p> <p>There are links to all sorts of things which look vaguely related to this on your website but, after looking at a few of them, I rapidly lost the will to live, so I'm still none the wiser.</p>

			It would have been really good if you had put in the letter a simple explanation of what designation as Green Belt actually means, its implications for the future etc. As it is, I believe that people who respond to you will do so from a position of little knowledge, rendering the value of their responses questionable.
<b>1499</b> <b>Hallam Land Management</b>	Object	Policy SAD.3 - Greenbelt	<p>Object to inclusion of land south of Grange Road within proposed new greenbelt. The approach to Greenbelt set out in the draft RSS (upon which the Council's policy is based) is flawed. It is premature to include such a policy in the LDF without the support of an adopted higher level policy. The boundary is also drawn too tightly against the urban area to the detriment of the greenbelt. If a shortfall in housing delivery rates occurred this would need to be addressed through development on the edge of the City and may therefore require a review of the greenbelt boundary in the near future. Even if delivery can be met, further housing will be needed beyond 2026.</p> <p>Furthermore a tightly drawn greenbelt boundary which endures only for the duration of the plan period and makes no provision for safeguarded land would be inconsistent with Government policy.</p> <p>Policy SAD3 and supporting text should be deleted.</p>
<b>1551</b> <b>Vanessa Worrall</b>	Support	Policy SAD.3 - Greenbelt	Strongly support the proposal. The land is full of wildlife and brings the countryside to the urban area. Infrastructure in the area is not suitable for more vehicles. Corncroft and Winneycroft Lane already act as 'rat runs' for Quedgeley from Cheltenham. Traffic already builds up at peak times along Corncroft Lane at its junction with Painswick Road. The junction is already dangerous due to traffic speeds and adding more traffic would be ludicrous.
<b>1555</b> <b>Mr Pete Tiley</b>	Support	Policy SAD.3 - Greenbelt	Fully endorse this proposal.
<b>1492</b> <b>Kayterm Plc</b>	Object	Policy SAD.3 - Greenbelt	<p>Kayterm has serious concerns regarding the way in which the green belt extension has been proposed in the Gloucester LDF process. The SAD preferred options consultation is the first stage at which an extension to the green belt within Gloucester has been suggested by the Council. We consider that a major policy issue of this nature should be included within the Core Strategy, which guides the preparation of all other LDF documents. In addition, a policy such as green belt would be expected to be included within the Development Control Policies DPD. However, the Core Strategy and Development Control Policies DPD's have been through both their issues and options and preferred options stages without any discussion on this important topic. We therefore consider that the preferred options consultation fails test of soundness (vi) in relation to coherence and consistency between DPD's.</p> <p>In more general terms, PPG2 Green Belts, paragraph 2.6 states that exceptional circumstances are required to amend the Green Belt boundary. Kayterm does not consider that these exist in the case</p>

			<p>of amending the inner boundary of the green belt, which has served very well for many years.</p> <p>With specific reference to the proposed extension to the south of Gloucester (identified on the proposals map as including Robinswood Hill and the surrounding areas) Kayterm considers that the designation of this area will not serve to fulfill the five purposes of including land within the green belt as set out in PPG2 (paragraph 1.5). This area of Gloucester City is not in danger of unrestricted sprawl; or with coalescence with neighbouring settlements. In addition, normal planning powers provide the Council with adequate control to safeguard the open countryside from encroachment; preserve the setting of the city; and assist in urban regeneration.</p> <p>The Preferred Options Consultation Document states that the outer extent of the green belt as currently proposed in the Draft RSS will fall in Stroud District and will need to be fixed at a later date in their LDF. It is worth noting that the Stroud District Local Plan was adopted in November 2005 and the policies within it are therefore saved. The land immediately beyond Gloucester City's boundary, directly south of Robinswood Hill, is designated in the Stroud District Local Plan as a Special Landscape Area. Beyond this is the Cotswold Area of Outstanding Natural Beauty. Normal planning powers again provide adequate control to safeguard this area of land.</p> <p>Work on the Stroud LDF Core Strategy is not scheduled to commence until 2008, with other DPD's following on after this time. A green belt designation to properly complement that being proposed by Gloucester City Council will therefore not be in place for a considerable length of time. Test of Soundness (vi) sets out that strategies/policies/allocations in the plan must be coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities where cross-boundary issues are relevant. In addition to inconsistency between the Core Strategy, Development Control Policies and Site Allocations and Designations DPD's prepared by Gloucester City Council, Kayterm considers that draft Policy SAD.3 fails test of soundness (vi) in relation to consistency between DPD's prepared by neighbouring authorities.</p>
<b>1493</b>	Support	Policy SAD.3 - Greenbelt	Support the proposals to include land to the south of Gloucester within a Greenbelt designation. Welcome the fact that the land will be excluded from potential development and will be freely accessible to all.
<b>J R Hodges</b>			
<b>1504</b>	Object	Paragraph 3.25	Object to Gospel Hall site being included within proposed Green Belt. It is a brownfield site and as such should be omitted from the proposed Green Belt.
<b>Bellway Homes Wales</b>			
<b>1560</b>	Support	Policy SAD.3 - Greenbelt	Support the allocation of this land as greenbelt.

<b>Virginia Ryder</b>			
<b>1559</b> <b>Miss Carol Bond</b>	Support	Policy SAD.3 - Greenbelt	Support the allocation of this land as greenbelt.
<b>1562</b> <b>C J Waterman</b>	Support	Policy SAD.3 - Greenbelt	Support the proposal to allocate this land as greenbelt. The area is a valuable asset and should be protected from development. The boundary proposed is supported. Changes to this area should be resisted including any proposal to exclude the Knoll nursing home from the Greenbelt as housing in this location would degrade the character of the scarp face at the western boundary of the Country Park.
<b>1564</b> <b>Ms R M Onians</b>	Comment	Policy SAD.3 - Greenbelt	No objection in principle but proposal should not prevent the Gloucestershire Gateway Project Motorway Service Area - a most imaginative project that deserves to succeed.
<b>1570</b> <b>J A Bailey</b>	Support1	Policy SAD.3 - Greenbelt	Support designation of land south of Gloucester, including Robinswood Hill, as green belt.  Supporter is keen to ensure that land at The Knoll, Stroud Road is included in the designation.
<b>1571</b> <b>Mr &amp; Mrs Stephenson</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as green belt.
<b>1572</b> <b>Mr Jeremy Dancey</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land south of Gloucester, including Robinswood Hill as green belt.
<b>1573</b> <b>Mr &amp; Mrs Lethbridge</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill as green belt.
<b>1574</b> <b>Mr &amp; Mrs Payne</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill as green belt.

<b>1575</b> <b>Mr &amp; Mrs Montague</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as green belt.
<b>1576</b> <b>Dr &amp; Mrs Knight</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as green belt.
<b>1577</b> <b>Mr &amp; Mrs Daniel</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as green belt.
<b>1578</b> <b>V G Kereres</b>	Support	Policy SAD.3 - Greenbelt	Supports designation of land to south of Gloucester, including Robinswood Hill, as green belt.
<b>1580</b> <b>Mr A A Mellanby</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as green belt.
<b>1585</b> <b>The Occupier</b>	Support	Policy SAD.3 - Greenbelt	Support designation of Robinswood Hill as green belt.
<b>1510</b> <b>Mrs K Hutton</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as Green Belt.
<b>1511</b> <b>Mr Robert Burns</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as Green Belt.
<b>1512</b> <b>Mr Laurence Fuller</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as Green Belt.
<b>1516</b>	Support	Policy SAD.3 -	Support proposed designation.

<b>Mr Paul Woodman</b>		Greenbelt	
<b>1517</b>	Support	Policy SAD.3 - Greenbelt	Support proposed designation.
<b>Mrs M Day</b>			
<b>1518</b>	Support	Policy SAD.3 - Greenbelt	Support proposed designation.
<b>Mr &amp; Mrs D Coward</b>			
<b>1519</b>	Support	Policy SAD.3 - Greenbelt	Support proposed designation.
<b>Mr A Melanby</b>			
<b>1520</b>	Support	Policy SAD.3 - Greenbelt	Support proposed designation.
<b>Mr &amp; Mrs M Hill</b>			
<b>1521</b>	Support	Policy SAD.3 - Greenbelt	Support proposed designation.
<b>Mr &amp; Mrs R Merrett</b>			
<b>1523</b>	Support	Policy SAD.3 - Greenbelt	Support allocation of this land as greenbelt. Object to any development in this area including the potential development of land at the Knoll which should be included in the proposed greenbelt with no development allowed in the immediate vicinity of this area. Any development in this area will increase traffic to the south of the City and Stroud Road is unsuitable to accommodate this.
<b>Mr D &amp; Mrs Y Wallace</b>			
<b>1524</b>	Object	Policy SAD.3 - Greenbelt	Object to the proposed greenbelt extension around Robinswood Hill particularly at the bottom where there are housing developments and a church hall. The church hall and car park should be excluded as it will need to be updated soon. As the area is built up it does not warrant inclusion in the greenbelt.  Land at 32/34 Matson Lane and the new development off Juniper Avenue should also be excluded.
<b>PD Services Consultants</b>			
<b>1534</b>	Support	Policy SAD.3 - Greenbelt	Strongly support moves to make land south of Grange Road greenbelt.
<b>Mr Martyn Williams</b>			
<b>1535</b>	Support	Policy SAD.3 -	Fully support the City Council's decision to designate Robinswood Hill as Green Belt - particularly

<b>Mr Geoff Coxe</b>		Greenbelt	including Winnycroft Farm.
<b>1545</b> <b>Rosemary &amp; David Sheldon</b>	Support	Policy SAD.3 - Greenbelt	Support designation of land to south of Gloucester, including Robinswood Hill, as Green Belt.
<b><u>Policy SAD.4 – Sites of Nature Conservation Importance &amp; Special Scientific Interest</u></b>			
<b><u>Paragraphs 3.36 – 3.45</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.4 – Sites of Nature Conservation Importance & Special Scientific Interest	This policy is supported in principle.
<b>0445</b> <b>Environment Agency</b>	Support	Policy SAD.4 – Sites of Nature Conservation Importance & Special Scientific Interest	We are pleased to note that these biodiversity areas include the watercourses within Gloucester as they provide important linear features. We also welcome the acceptance that it may be appropriate to consider the potential impact of development where it adjoins these sites.
<b>1016</b> <b>Mr K M Keates</b>	Support	Policy SAD.4 – Sites of Nature Conservation Importance & Special Scientific Interest	Support this policy and paragraphs 3.36 - 3.42.
<b>1443</b> <b>Brasenose</b>	Object	Policy SAD.4 – Sites of Nature Conservation	We raise concern that Draft Policy BNE1 could be interpreted in such a way as is overly onerous for developers. We therefore welcome the approach set out in supporting text to Draft Policy SAD4 in the Preferred Options Consultation Document, which makes clear that development affecting a SNCI may

<b>College</b>		Importance & Special Scientific Interest	be acceptable where appropriate mitigation is included within the proposals. We consider that all LDF policies relating to SNCI's should include adequate flexibility so that a proper assessment of the benefits and losses associated with a specific development proposal can be undertaken.
<b>1446</b> <b>Gloucestershire County Council</b>	Support	Policy SAD.4 – Sites of Nature Conservation Importance & Special Scientific Interest	Proposed policy SAD4 is welcomed for reasons previously given for proposed policy CA9 in the Central Area Action Plan. As the biodiversity resource is more extensive and diverse in the Non-Central Area this is a crucial and necessary policy.
<b>1492</b> <b>Kayterm Plc</b>	Support	Policy SAD.4 – Sites of Nature Conservation Importance & Special Scientific Interest	As set out in the representations too the Development Control Policies DPD preferred, Kayterm is concerned that draft policy BNE.1 could be interpreted in such a way as to be overly onerous for developers. We therefore welcome the approach set out in the supporting text to draft policy SAD.4, which makes clear that development affecting an SNCI may be acceptable where appropriate mitigation is included within the proposals. Kayterm considers that all LDF policies relating to SNCI's should include adequate flexibility so that a proper assessment of the benefits and losses associated with a specific development proposal can be undertaken.
<b>1503</b> <b>Taylor Woodrow Developments</b>	Support	Policy SAD.4 – Sites of Nature Conservation Importance & Special Scientific Interest	Support the approach set out in the supporting text to Policy SAD4, which makes clear that development affecting a SSSI may be acceptable where appropriate mitigation is included within the proposals. All policies relating to SNCI's should include adequate flexibility so that a proper assessment can be undertaken.

**Policy SAD.5 – Prime Biodiversity Area**

**Paragraph 3.46 – 3.56**

<b>0171</b> <b>Bovis Homes Limited</b>	Comment	Policy SAD.5 – Prime Biodiversity Area	Further information is required with regards to Prime Biodiversity Areas and how these areas are identified.  We would like to withhold any comments until further information is available.
<b>0184</b>	Support	Policy SAD.5 – Prime	Support the policy but note that planning permission has already been given for development between the canal and the bypass. We strongly advocate that conditions should be attached to the

<b>Hempsted Residents Association</b>		Biodiversity Area	development to ensure compliance with Policy SAD5.
<b>0942 English Nature</b>	Support	Policy SAD.5 – Prime Biodiversity Area	English Nature supports this policy, in particular its cross-reference to policy BNE.1 and Core Policy 8. It would however, be worth nothing that these two policies could also help the Council to achieve Policy BNE.3: Wildlife Corridors, Greenbelts, and allocated Prime Biodiversity Areas. It will form vital 'routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment', as recommended in PPS9 - Biodiversity and Geological Conservation.
<b>1016 Mr K M Keates</b>	Support	Paragraphs 3.46 – 3.47	Support these paragraphs.
<b>1016 Mr K M Keates</b>	Object	Policy SAD.5 – Prime Biodiversity Area	These paras and policy SAD.5 seem to encourage development rather than seeking to restore and enhance biodiversity and should be reworded to reflect the purpose as set out in para 3.46.  There does not appear to be a policy in the Development Control Policies Preferred Options DPD to deal with development proposals in the PBA. Policy SAD 5 should refer to proposals for new development within the PBA being determined in accordance with draft Policy BNE1 of the Development Control Policies DPD.
<b>1446 Gloucestershire County Council</b>	Support	Policy SAD.5 – Prime Biodiversity Area	A policy commitment (SAD5) to land to the west of Gloucester as a Prime Biodiversity Area is encouraging. It is an obvious choice particularly given the enhancement efforts already secured over this extensive wetland area through the Severnside Project and Alney Island Group. The latter initiative is funded through the use of developer contributions and a similar mechanism should be used to secure long-term funding for the Severnside Project.
<b><u>Policy SAD.6 – Allotments</u></b>			
<b><u>Paragraphs 3.57 – 3.64</u></b>			
<b>0171 Bovis Homes Limited</b>	Comment	Policy SAD.6 - Allotments	The importance of allotments within the non-central area is noted.  The protection of all allotments is an inflexible approach. Allotments should only be safeguarded if there is a demonstrable shortage within the area. This should be informed by an up-to-date open space assessment.

**Policy SAD.7 – Robinswood Hill Country Park**

**Paragraphs 3.65 – 3.73**

<b>0184</b> <b>Hempsted Residents Association</b>	Support	Policy SAD.7 – Robinswood Hill Country Park	Strongly support this policy as Hempsted Village occupies a prominent position and offers extensive and unrivalled views of Gloucester's one current Country Park.
<b>0445</b> <b>Environment Agency</b>	Support	Policy SAD.7 – Robinswood Hill Country Park	We support the continued allocation of Robinswood Hill as a Site of Nature Conservation Importance and Landscape Conservation Area.
<b>1492</b> <b>Kayterm Plc</b>	Object	Policy SAD.7 – Robinswood Hill Country Park	<p>The preferred options consultation document (paragraph 3.72) reports that strong support was received at the Issues and Options stage for the protection of Robinswood Hill as area of public open space and an SNCI. Kayterm considers that the focus for Policy SAD.7 should be upon the country park and the resource that this provides in terms of public open space and informal recreation. We are of the view that, as currently drafted, the policy lacks this appropriate direction. We consider that references to the SNCI, LCA and views of the Hill are not necessarily within this policy.</p> <p>Paragraph 3.73 sets out that the Council will look to more clearly define important 'view' corridors of the Hill, and states that these will be identified on the proposals map upon submission of the document in March 2007. Kayterm objects to this proposal, as we consider that it is inappropriate that any proposed policy designations should be unavailable for public consultation until the submission stage. In addition, as referred to above, we consider that the policy should be focussed upon Robinswood Hill as a Country Park rather than upon landscape and visual or nature conservation designations.</p>
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Paragraph 3.65	<p>The site does not contribute to the Landscape Character of the Area. It comprises a large shed style building on a tarmaced site with a car park illuminated by spotlights. The site is screened on three sides by mature planting so that it cannot be seen from Robinswood Hill Country Park, including from an elevated position.</p> <p>It is not considered appropriate that the site should be within the Landscape Character Area as it in no way contributes to the character or setting of the park.</p> <p>The site should be removed from the Landscape Character Area and the proposals map ammended</p>

			accordingly.
<b><u>Policy SAD.8 – Floodplain</u></b>			
<b><u>Paragraphs 3.74 – 3.79</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Object	Policy SAD.8 - Floodplain	Is the policy suggesting that no new high-risk development (i.e. residential) will be permitted in the areas identified on the proposals map as floodplain?  The policy requires further clarification.
<b>0184</b> <b>Hempsted Residents Association</b>	Object	Policy SAD.8 - Floodplain	Policy supported but due to the incursion of road embankments and expansion of the Hempsted Tip, the policy should be strengthened to state 'not be permitted except in exceptional circumstances and be in accord with the environmental aspects of the area. Paragraph 3.75 should likewise be strengthened.
<b><u>Policy SAD.9 – Conservation Areas</u></b>			
<b><u>Paragraphs 3.80 – 3.86</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.9 - Conservation Areas	The principle of this policy is supported.
<b>0184</b> <b>Hempsted Residents Association</b>	Support	Policy SAD.9 - Conservation Areas	The association supports the redefinition of the boundary of the Hempsted Conservation Area.
<b><u>Policy SAD.10 – Important Views</u></b>			
<b><u>Paragraph 3.87 – 3.90</u></b>			
<b>0171</b>	Support	Policy SAD.10	The principle of this policy is supported.

<b>Bovis Homes Limited</b>		- Views and Skyline	
<b>0184</b> <b>Hempsted Residents Association</b>	Support	Policy SAD.10 - Views and Skyline	Policy supported.
<b>1016</b> <b>Mr K M Keates</b>	Object	Policy SAD.10 - Views and Skyline	Whilst supporting the principles set out in the in these paragraphs and policy I object to the omission of views of Robinswood Hill and other high ground from Hempsted (see Supplementary Planning Guidance March 1996) and object to the omission of the view from Hempsted Lane near Manor Farm House towards Newark House and beyond as referred to in the Gloucester City Local Plan Inquiry held in 1993, the Report of Objections paragraphs 6.2.20 and 6.2.21.  In addition there appears to be know specific policy for the protection of these views in the Development Control Policies DPD, which could be referred to in SAD.10.
<b>1492</b> <b>Kayterm Plc</b>	Object	Policy SAD.10 - Views and Skyline	Kayterm objects to this policy, as we consider that it is inappropriate that any proposed designations should be unavailable for public consultation until such a late stage in the DPD preparation process.
<b><u>Policy SAD.11 – District and Local Centres</u></b>			
<b><u>Paragraphs 3.91 – 3.99</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.11 - District and Local Centres	The principle of this policy is supported.
<b>0184</b> <b>Hempsted Residents Association</b>	Support	Policy SAD.11 - District and Local Centres	This policy is supported. Also support the possible designation of a new Local Centre on Bristol Road.

**Policy SAD.12 – Cordon Sanitaire****Paragraphs 3.100 – 3.108**

<b>0171</b> <b>Bovis Homes Limited</b>	Comment	Policy SAD.12 – Cordon Sanitaire	Further information is required to what types of development the Council feel is suitable and unsuitable within the Cordon Sanitaire.
<b>0184</b> <b>Hempsted Residents Association</b>	Support	Policy SAD.12 – Cordon Sanitaire	The association support this policy as it is evident that problems of smell do occur despite investments made by Severn Trent.
<b>0202</b> <b>MWA Planning &amp; Development Consultancy</b>	Object	Policy SAD.12 – Cordon Sanitaire	Council's justification for maintaining the cordon is flawed. The policy is a legacy of previous circumstances and technical work undertaken by Environ on behalf of BT indicates that it is no longer needed. Receipt of one or two complaints per year does not justify retaining the cordon. Delete BT site from Cordon Sanitaire.
<b>1442</b> <b>Cavanna Homes (South West) Limited</b>	Object	Policy SAD.12 – Cordon Sanitaire	Object. Recent upgrades and technological advancements at the Netheridge works, together with the re-assessment of the appropriate size of such a cordon to between 25m and 400m justifies a reduction of the cordon sanitaire. The boundary should be re-drawn to a maximum distance of 400m.

**Policy SAD.13 – Areas of Principle Archaeological Interest****Paragraphs 3.109 – 3.113**

<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.13 – Areas of Principle Archaeological Interest	The principle of this policy is supported.
<b>0184</b>	Support	Policy SAD.13	Support this policy.

<b>Hempsted Residents Association</b>		– Areas of Principle Archaeological Interest	
<b>1445 Gloucestershire County Council</b>	Comment	Policy SAD.13 – Areas of Principle Archaeological Interest	See comments made to Central Area Action Plan.
<b>1492 Kayterm Plc</b>	Comment	Policy SAD.13 – Areas of Principle Archaeological Interest	Kayterm accepts the approach to designating Areas of Principle Archeological Interest. However, as set out in previous representations, we consider that this policy and policies BNE.8 and BNE.9 should be reworded to state '...the Council will seek to protect and where appropriate enhance or preserve sites of archeological interest'.
<b><u>Policy SAD.14 – Scheduled Ancient Monuments</u></b>			
<b><u>Paragraphs 3.114 – 3.117</u></b>			
<b>0171 Bovis Homes Limited</b>	Support	Policy SAD.14 – Scheduled Ancient Monuments	The principle of this policy is supported.
<b>0184 Hempsted Residents Association</b>	Support	Policy SAD.14 – Scheduled Ancient Monuments	Support this policy.
<b>1445 Gloucestershire County Council</b>	Comment	Policy SAD.14 – Scheduled Ancient Monuments	See comments to Central Area Action Plan.

**Policy SAD.15 – Bus Priority Routes**

**Paragraphs 3.118 – 3.125**

<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.15 - Bus Priority Routes	The principle of this policy is supported.
<b>0184</b> <b>Hempsted Residents Association</b>	Object	Policy SAD.15 - Bus Priority Routes	Hempsted is badly served by public transport. The advent of the SW bypass together with the concentration of residents in Hempsted and the Quays development should offer the opportunity to improve the situation. The association therefore seek the inclusion of Hempsted Lane and possibly the SW bypass as part of a Circular Route operating at frequent times during the day.
<b>1395</b> <b>Sainsbury's Supermarkets Plc</b>	Support	Paragraph 3.121	<p>Sainsbury's Supermarkets, whilst supporting the general aims of policy SAD.15 (bus priority routes), consider that the policy should be revised to better reflect the Government guidance set out in 05/2005.</p> <p>The policy should be revised to state:</p> <p>Where appropriate, in determining planning applications for development that will result in an increase in traffic to or from a site, the City Council will seek to enter into an agreement under S106 of the 1990 Act for the developer to fund:</p> <ul style="list-style-type: none"><li>- Implementation of bus priority routes or the extension of existing bus priority routes</li><li>- Enhanced facilities and bus services</li><li>- Additional bus priority measures</li></ul> <p>Such agreements shall we related to the proposed development and reasonable in all respects as required by Government guidance, as set out in Circular 05/2005.</p>

**Policy SAD.16 – Cycle and Pedestrian Routes**

**Paragraphs 3.126 – 3.136**

<b>0171</b>	Support	Policy SAD.16 - Cycle and	The principle of this policy is supported.
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<b>Bovis Homes Limited</b>		Pedestrian Routes	
<b>1449</b> <b>Gloucestershire County Council</b>	Object	Policy SAD.16 - Cycle and Pedestrian Routes	Whilst welcoming the acknowledgement that provision for cyclists is necessary we would recommend that this should be required in all but the smallest developments, rather than just major developments.
<b><u>Policy SAD.17 – Static Caravan Sites</u></b>			
<b><u>Paragraphs 3.137 – 3.144</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.17 - Static Caravan Sites	The principle of this policy is supported.
<b><u>Policy SAD.18 – Showmen’s Guild</u></b>			
<b><u>Paragraphs 3.150 – 3.153</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD 18 - Showmen's Guild	The principle of this policy is supported in principle.
<b>0649</b> <b>The Showmen’s Guild of Great Britain</b>	Support	Policy SAD 18 - Showmen's Guild	The Showmen's Guild of Great Britain strongly support the safeguarding of the existing site at Poole Meadow as a site for travelling showpeople.  The Council will be aware of the acknowledged shortfall in provision for travelling showpeople and overcrowding at Pool Meadow. The Guild will be making further representations direct to Officers of the Council and meeting with them in order to press for urgent steps to be taken to secure additional sites for travelling showpeople in order to meet the significant need in the Gloucester area.
<b>1366</b> <b>IM Group</b>	Support	Policy SAD 18 - Showmen's Guild	There is support for this policy, particularly in light of the contents of paragraphs 3.150 and 3.151, stating that the site is needed to be retained to accommodate the existing occupants. However, with regard to the statement included in paragraph 3.150 there is no evidence presented of the need for additional accommodation, other than a reference to the site being 'overcrowded'. There is also no evidence of the 'need...to identify new sites to address the shortfall' in respect of paragraph 3.151.

**Policy SAD.19 – Safeguarded Family Housing in Barton and Tredworth**

**Paragraphs 3.154 – 3.159**

<p><b>0171</b> <b>Bovis Homes Limited</b></p>	<p>Object</p>	<p>Policy SAD.19 - Family Housing</p>	<p>This is a very restrictive policy. The Council should not have the ability to determine the mix of housing on new development sites. This approach is not supported in National or Regional Planning Policy. The mix of housing on new development sites should be market led in which housebuilders have an excellent understanding of the requirements of the housing market.</p> <p>This policy also seems to be contrary to National and Regional Planning Policy - in particular the requirement to make the most efficient use of land.</p> <p>We fail to see how the proposed policy relates to the overarching aims of National and Regional Policy and request that it is deleted.</p>
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**Site Allocations and Commitments**

**Paragraphs 4.1 – 4.5**

<p><b>1443</b> <b>Brasenose College</b></p>	<p>Support</p>	<p>Paragraph 4.2</p>	<p>We support the Local Authorities view that 'support needs to promote more modest growth in sustainable locations outside the central area'. This site (Frogcastle Farm) is accepted as being:-</p> <ul style="list-style-type: none"> <li>• Well located in relation to the City Centre</li> <li>• Represents a sustainable development in terms of access to shops and services, and reducing the need to travel by car</li> <li>• Only part of the area is suggested for development</li> <li>• Presents an opportunity for a direct bus lane to the A40</li> </ul> <p>A solution to the Environment Agency concerns is to be produced</p>
<p><b>1452</b> <b>Sylvanus Lyson's Charity</b></p>	<p>Object</p>	<p>Housing Allocations and Commitments</p>	<p>As stated in the introduction, the Sylvanus Lyson's Charity notified the City Council of the development potential of the land identified on the attached Plan as far back as March 2005. The existence of the site was also known to the City Council from the time of the preparation of the current adopted Local Plan.</p> <p>While it is clear and accepted that the majority of new residential development in the City is likely to</p>

			<p>emerge from the Central Area and particularly the area surrounding the Docks, there is undoubted potential on the Hempsted land for high quality residential development. The Charity is therefore extremely disappointed that there is no evidence of proper consideration having been given to this land.</p> <p>The Draft Regional Spatial Strategy requires that provision be made for 11,500 additional dwellings in the period 2006 to 2026. Draft PPS3 paragraph 13 requires that site allocation documents should always include at least five years supply of land for development from the date they are adopted. The five-year supply should be allocated land that is developable, taking account of windfall allowance where this appropriate. The Draft Practice Guidance on Housing Land Availability Assessments states at paragraph 9 that "local authorities should allocate land in relevant development plan documents for at least the first 5 years of housing. They should allocate or broadly identify a further 10 years of sites for future housing development". Draft PPS 3 also makes it clear in paragraph 13 that sites for inclusion should be available, suitable and viable.</p> <p>Although the Council has deleted some sites since the Issues and Options stage, it is considered that not all of the sites proposed for allocation in Table 1 meet the criteria in paragraph 13 of Draft PPS3. It is noted that the Council has decided to delete the proposed allocations at Frogcastle Farm and Grange Road and this decision is supported. However there are still issues about the deliverability of the following sites (see separate sites)</p> <p>The Council has not given sufficient weight to the deliverability of the proposed allocations. As stated above, there are issues with most of the larger allocations which could have serious consequences for meeting the housing requirement set by the Structure Plan and by the RSS following its review.</p> <p>It is also contended that the Council should be allocating land for 2,875 dwellings (5 x 575) i.e. five years' supply based upon the requirement in the emerging RSS and identify or allocate ten years supply from the date of adoption.</p> <p>It is not appropriate to assume that all existing commitments will come forward before 2013. A proportion of planning permissions will not be implemented and there should be sufficient flexibility in supply to ensure that the strategic target will be met.</p>
<b>1492</b>	Support	Paragraph 4.2	<p>Kayterm supports paragraph 4.2, and the recognition of:</p> <ul style="list-style-type: none"> <li>• A need to promote growth in sustainable locations outside the City Centre</li> <li>• A need for urban extensions</li> </ul>
<b>Kayterm Plc</b>			
<b>1503</b>	Support	Paragraph 4.2	Support the statement, which states that 'support needs to promote more modest growth in

<b>Taylor Woodrow Developments</b>			sustainable locations outside the Central Area'.
<b>Housing Allocations</b>			
<b>Paragraphs 4.6 – 4.18</b>			
<b>0383</b> <b>Boyer Planning Limited</b>	Object	Paragraph 4.6	<p>The document states that regard has been had to the housing requirements set out in draft RSS10. Plainly only limited weight can be given to those provisions at this early stage in the process. Objections have been submitted by a number of parties arguing that provision should be increased.</p> <p>It is misleading and potentially damaging to the LDF to put forward as a preferred option, a strategy which is incapable of accommodating any such increases in provision. The consultation document refers to land at Winneycroft Farm as a large greenfield site which would be contrary to the Core Strategy. The Council is however relying on a core strategy which is contingent upon one particular outcome of RSS10 and contains no flexibility to deal with either an increase in housing provision or constraints in bringing forward any of the identified sites.</p> <p>Accordingly we object to the housing allocations and reaffirm our submission that land at Winneycroft Farm should be allocated for housing and other uses. Reject the Council's assertion that the site is poorly located in terms of facilities and public transport.</p>
<b>1377</b> <b>Gloucestershire Hospitals NHS Foundation Trust</b>	Comment	Paragraph 4.18	<p>The Gloucestershire Hospitals NHS Foundation Trust is supportive of the efforts being made by the Council to develop the City and to promote sustainable development. The comments that are put forward in this representation are concerned with the safeguarding the efficient functioning of Gloucestershire Royal Hospital. The trust would welcome the opportunity got continuing dialogue with the City Council to ensure that this and other objectives are met in the context of major developments in the Gloucester City area.</p> <p>At paragraph 4.18, contribution to healthcare should be added to the list of more general requirements for the majority of sites as new residential developments will have a significant impact on healthcare provision.</p> <p>The consequences of significant residential development in terms of demands placed on the wider Health Community will largely be felt by the providers of Primary Care. The new Primary Care Trust</p>

<p><b>1443</b></p> <p><b>Brasenose College</b></p>	<p>Object</p>	<p>Paragraphs 4.10 – 4.11</p>	<p>for Gloucestershire will also need to be kept informed of these proposals, be part of the dialogue with the City Council and included in assessments for infrastructure provision by developers.</p> <p>Objection is raised to the City Council's reliance on its existing commitments.</p> <p>Paragraph 4.10 states that 'as of March 2006, the total number of committed new dwellings in Gloucester (i.e. sites with planning permission or permission subject to a legal agreement) is 5,716.</p> <p>We presume this starting figure is a typing error, as the Council's Housing Land Availability Study (March 2006) states that 4,716 dwellings are committed.</p> <p>Paragraph 4.11 states that it is reasonable to assume that all these commitments will come forward before 2013, and that Gloucester's housing requirement can therefore be met via existing commitments alone.</p> <p>We refute this argument on two main points:</p> <ul style="list-style-type: none"> <li>- The Gloucester area should be providing a total of about 13,000 dwellings over the RSS period (in relation to Barton Willmore's RSS representations, attached at Appendix 1), equating to 650 dwellings per annum, or 5200. Assuming the Council can indeed rely on its existing commitments, it still cannot meet the projected RSS requirement, falling short by around 500 dwellings.</li> </ul> <p>-Notwithstanding this, we believe that the Council's existing commitments are fundamentally flawed. It is our conclusion that a significant number of the existing commitments are unreliable and therefore unlikely to come forward, meaning additional sites must be allocated to meet the 5 year land requirement.</p> <p>The Council's Housing Monitoring Report 2006 provides detailed information on the progress of all existing commitments. In many cases, sites have a valid permission, but after a substantial period of time development has yet to begin, which leads to a significant degree of doubt over the reliability of such sites, and the reliability of the Council's assumptions in general. In other cases, the outline permission has lapsed, meaning the site should be removed from the table. Creating a fundamental flaw in the Council's housing numbers.</p> <p>The following reviews information from the Housing Monitoring Report 2006.</p> <ul style="list-style-type: none"> <li>• Dwellings full planning permission for 2 years or over that have not been started 155</li> <li>• Dwellings with outline consent of 2 years or over that have not been started 105</li> </ul>
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			<ul style="list-style-type: none"> <li>Section 5 - Lapsed dwelling consents 67</li> </ul> <p>From this we can see that a total of 327 dwellings should be regarded with serious doubt as there is no evidence to suggest they will come forward and cannot therefore be relied upon. In addition, over a third of the sites relate to outline permissions, and there is evidence to suggest that the eventual reserved matters application may not necessarily equate to the same numbers in the outline permission. For example, an outline application was approved in 2003 for 650 dwellings at the former cattle market site in Gloucester. The recently permitted Reserved Matters (May 2006) equated to 450 dwellings - a loss of 200 from the outline.</p> <p>This casts significant doubt on the Council's reliance on existing commitments, as the actual figures differ significantly from those recorded in the Housing Monitoring Report 2006.</p> <p>PPG3 states in paragraph 34 that 'sufficient sites should be shown on the plan's proposals maps to accommodate at least the first five years (or the first two phases) of housing development proposed in the plan', whilst the emerging PPS3 is specific when it states that a 5 year land supply should be provided in the LDF. To be developable, sites must be available, suitable, and viable. Clearly the sites examined above and the case of the cattle market mean that the Council's figures must be critically reviewed and cannot be relied upon. We recommend that including the cattle market, at least 527 dwellings listed as commitments in the Housing Monitoring Report 2006 cannot be relied on, and this casts doubt over the integrity for the remainder of the number.</p> <p>In summary, we believe Gloucester has around 4200 commitments that potentially may come forward in the period to 2013, but are unrealistic. This falls well short of the 5,200 dwellings required by Barton Willmore's RSS and Bruton Knowles' reps, resulting in a shortfall of approximately 1,000 dwellings. Further land therefore needs to be allocated in order for the paper to meet the tests of soundness identified in PPS12.</p>
<b>1443</b> <b>Brasenose College</b>	Object	Paragraphs 4.6 – 4.8	<p>Objection is made to the provision of 11,500 new dwellings in total over the 20-year period of the RSS, equating to 575 dwellings per annum.</p> <p>Barton Willmore's and Bruton Knowles' representations to the RSS seek the provision of additional housing in the Gloucester and Cheltenham HMA. Our evidence base leads us to believe that a total of 13,000 dwellings should be provided by Gloucester, which equates to a 1,500 increase over the draft RSS provision. This leads to a dwelling per annum level of 650, as opposed to 575. Gloucester city should therefore provide a total of 130,000 dwelling units over the RSS plan period of 20 years.</p> <p>The city council assume adoption of the Site Allocations and Designations (Non Central Area)</p>

			<p>Preferred Options document in 2008, but relate a figure of 4,600 new dwellings in the period 2006 - 2013. We believe this figure should be related to Barton Willmore's RSS objections and Bruton Knowles, and therefore provide 650 dwellings per annum, equating to 5,200 dwellings over that period.</p> <p>Further allocations should therefore be made to meet RSS requirements, and meet the requirements specified by PPS12.</p>
<b>1443</b> <b>Brasenose College</b>	Support	Paragraph 4.9	<p>Support is given to paragraph 4.9 that states:</p> <p>Sites allocated for housing must be available, suitable, and viable. The priority for development is developable brownfield land.</p> <p>We support this statement and acknowledge its conformity with PPG3, PPS12, and the emerging PPS3. However, we would comment that all housing sites within the LDF should meet the above requirement.</p> <p>Brownfield sites are difficult to bring forward, with fragmented ownerships, contamination, poor access etc, and cannot always be brought forward within the envisaged timescale.</p> <p>Greenfield sites should be made available on the basis of reserve sites or later in the Plan period.</p>
<b>1449</b> <b>Hallam Land Management</b>	Object	Paragraph 4.6	<p>Object to the use of the draft housing requirement set out in the draft Regional Spatial Strategy. This has not been independently tested through the public examination process. There are sound reasons for increasing the requirement for Gloucester from 11,500 to 14,000. Using the draft figure may mean development opportunities such as land south of Grange Road are discounted early in the LDF process although they may be needed if the requirement is increased.</p>
<b>1450</b> <b>Gloucestershire County Council</b>	Support	Paragraphs 4.17 – 4.18	<p>Support inclusion of this clarification about infrastructure requirements. Further detail would be helpful to landowners and developers.</p> <p>Amend 4.18: "More general requirements such as affordable housing, public open space, highway and transportation works and improvements, education (at children's centre, primary and secondary levels), and community functions (including services for Youth, Elderly, Disabled, Libraries and Fire &amp; Rescue) will be required from all relevant development where appropriate. The City Council will work in partnership with the County Council to secure appropriate contribution levels. All contributions will be subject to negotiation through the development control process."</p>
<b>1492</b> <b>Kayterm Plc</b>	Object	Housing Allocations	<p>PPS12 states (paragraph B27) that a housing trajectory should be prepared as part of the supporting evidence base when preparing initial housing allocation strategies which should be included within the relevant DPD. It also sets out (paragraph B28) the minimum information required in testing the</p>

		<p>soundness of a DPD that contains housing allocations, summarised as follows:</p> <ul style="list-style-type: none"> <li>i. Past dwelling completion rates</li> <li>ii. Projected completion rates until at least the end of the Plan Period, extending at least ten years from the base date of the DPD; and</li> <li>iii. For comparison, the strategic allocation which the plan strategy is expected to deliver over time, expressed as an average annual target.</li> </ul> <p>In relation to the past dwelling rates, Gloucester City Council's Housing Monitoring Report 2006 (March 2006) sets out that build rates have averaged 533.7 dwellings per annum. This past build rate is significantly less than the annualised dwelling requirement of the RSS, set out in the draft RSS at 575 dpa but estimated by Barton Willmore at 650 dpa.</p> <p>In terms of projected completion rates, the document places a heavy reliance on commitments i.e. sites with planning permission, which total 5716 new dwellings (paragraph 4.11).</p> <p>This consideration does not cover the required minimum ten-year period from the base date of the DPD. In addition, it makes a very unrealistic assumption that 100% of commitments will be implemented. Any assessment of projected completion rates should include a factor for accounting for the non-implementation of existing planning permissions. Barton Willmore believes that a significant number of the existing commitments are unreliable and therefore unlikely to come forward, meaning that additional sites must be allocated to meet the five-year land requirement. In some cases, outline planning permissions listed in the Council's Housing Monitoring Report 2006 have actually already lapsed.</p> <p>Draft PPS3 (paragraph 13) states that site allocation DPD's should always include at least 5 years supply of land for development from the date they are adopted. It sets out that the five-year supply should be allocated land that is developable, which means that it should meet the following criteria:</p> <ul style="list-style-type: none"> <li>i. Available - the site is available now or is likely to become available for housing development and be capable of being developed within five years. This means five years from the date of adoption of the site allocation DPD;</li> <li>ii. Suitable - the site offers a sustainable option for development and would contribute to the creation of sustainable urban and rural communities;</li> <li>iii. Viable - housing development is economically viable on the site.</li> </ul> <p>In this context, we consider that the assertion that all dwelling commitments will come forward for</p>
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			<p>development is unreliable, and the document therefore fails to provide at least five years supply of developable housing land.</p> <p>The document does not set out a housing trajectory that includes the requirements of PPG12 (paragraph B28). Neither does it include a clear demonstration of at least five-years supply of developable housing land. The failure of the document to fulfil these criteria means that it fails test of soundness (iv) which requires the plan to be consistent with national policy.</p>
<p><b>1492</b></p> <p><b>Kayterm Plc</b></p>	Object	Housing Allocations	<p>Barton Willmore made representations to the draft RSS on behalf of a number of clients, including Kayterm. Taking into account evidence in relation to house building rates and job growth, these representations to the draft RSS set out our belief that the Gloucester and Cheltenham Housing Market Area (HMA) should make a bigger contribution to the RSS than is proposed in the draft RSS document. Our evidence base suggests that 13,000 dwellings should be provided by Gloucester City, leading to an annual rate of 650 dwellings per annum (dpa) rather than 575 dpa. Kayterm objects to the provision level proposed in the preferred options consultation document for the same reasons, and urges the Council to consider increasing this figure to 13,000 dwellings (650 dpa) over the plan period.</p> <p>Paragraphs 4.7 - 4.8 sets out, that in line with Government guidance, the Council is required to identify a five-year supply of developable housing land from the proposed date of adoption of the DPD. It states that this means 4,600 new dwellings in the period 2006 - 2013, assuming adoption of this document in 2008, and utilising the draft RSS rate of 575 dpa.</p> <p>Applying our increased provision figure of 650 dpa to the eight-year period 2006 - 2013 leads to a requirement to provide 5,200 new dwellings. Kayterm considers that this is a more appropriate figure, for the reasons set out above.</p> <p>PPS12 - Local Development Frameworks, makes clear that housing allocation timeframes should extend at least ten years from the base date of the DPD. In addition, Draft PPS3 Housing (paragraph 12) sets out that, in addition to allocating sufficient land and housing for development for the first five years of the housing trajectory, LDF's should wherever possible also allocate land for the following ten years (i.e. a total of 15 years). In the context of PPS12 and Draft PPS3, Kayterm is concerned that Gloucester City Council is not making adequate provision for the appropriate period. We consider that this document fails test of soundness (iv) which requires the plan to be consistent with national policy.</p>
<p><b>1499</b></p> <p><b>Hallam Land Management</b></p>	Object	Paragraph 4.15	<p>Question the delivery of seven housing sites allocated in the preferred option document. The rugby club is dependent on relocation to another site. The ground is also subject to flooding. Clifton Road - part of the site is occupied and relocation will be needed. Clearwater Drive - subject to flooding. Mayo's Land - phased to come forward in the longer term. Oil Storage Depot - Constrained by contamination and adjacent area of landscape importance. Land at Leven Close - only a small amount</p>

			<p>of development possible. Hammond Way - Potential access difficulties.</p> <p>Also concerned about delivery of housing within the Central Area. It is unlikely that the required level of housing growth can be achieved without the need for additional greenfield development. Many sites are financially marginal while others are contaminated or subject to environmental constraints. In addition, central area sites have less potential to deliver a mix of dwelling types.</p> <p>A full audit of housing allocations and their deliverability should be undertaken.</p>
<b>1499</b> <b>Hallam Land Management</b>	Object	Paragraphs 4.13 – 4.14	<p>The approach to plan, monitor and manage set out in the document is flawed and does not provide sufficient detail. Whilst the Council has sought to plan for housing delivery, the Council must also monitor the delivery of housing and manage its delivery. Only brief reference is made to the possible use of phasing. The document is inconsistent with national policy and does not incorporate sufficient flexibility to deal with circumstances where an insufficient amount of housing comes forward for development.</p> <p>The document (and the Council's Core Strategy) should include a Housing Trajectory to more fully inform the approach to housing delivery.</p>
<b>1503</b> <b>Taylor Woodrow Developments</b>	Object	Section 4	<p>Object to the lack of a housing trajectory. The document does not conform to national policy and is unsound in the absence of a housing trajectory. The document cannot be brought forward in its current format. A detailed housing trajectory should be included in the document.</p>
<b>1503</b> <b>Taylor Woodrow Developments</b>	Object	Paragraph 4.15	<p>Object to the omission of land at St. Oswald's Road for housing development. The site is sustainably located and can deliver 50 dwellings. The sustainability of the site has been recognised by the Council in the Issues and Options paper. Development provides the opportunity for affordable housing and improved transport links. The site is predominantly in Flood Zone 2 meaning it may be developed subject to a Flood Risk Assessment. There are no ecological constraints that preclude the site coming forward for development. The landscape conservation designation should be reviewed.</p> <p>The Council has a shortfall of developable housing land and requires the allocation of further sites to meet the RSS requirement. The shortfall is approximately 1000 dwellings. Other sites that have been allocated are unlikely to come forward and therefore fail to meet the requirements of PPS3, which states that sites should be available, suitable and viable. Land at St. Oswald's Road fulfils all of these criteria.</p> <p>The site should be allocated in the Site Allocations and Designations (Non-Central Area) document.</p>

<p><b>1503</b></p> <p><b>Taylor Woodrow Developments</b></p>	<p>Object</p>	<p>Paragraph 4.10</p>	<p>Object to the Council's reliance on existing housing commitments. The City's housing requirement of 11,500 dwellings is likely to increase to 13,000 equating to 650 dwellings per year. Even if all existing commitments come forward this would fall short by around 500 dwellings. Notwithstanding it is our opinion that a significant number of existing commitments are unreliable and unlikely to come forward meaning additional sites must be allocated to the meet the 5 year requirement.</p> <p>The Council's Annual Housing Monitoring Report shows many sites with planning permission have not come forward even after several years. In some cases, permission has lapsed. A total of 327 dwellings in the Council's 2006 Housing Monitoring Report should be regarded as serious doubt. In addition, over a third relate to outline planning permissions and eventual reserved matters numbers may not equate to initial outline numbers. For example outline permission was granted for 650 dwellings at the Cattlemarket whilst the Reserved Matters permission was for 450 dwellings. A total of 527 committed dwellings cannot therefore be relied upon.</p> <p>There is a shortfall of around 1,000 dwellings (when assuming 13,000 dwellings for Gloucester instead of 11,500). Land at St. Oswald's Road should therefore be allocated for residential development.</p>
<p><b>1503</b></p> <p><b>Taylor Woodrow Developments</b></p>	<p>Object</p>	<p>Paragraph 4.6</p>	<p>Object to the provision of 11500 dwellings (575 dwellings per year). It is our view that 13,000 should be provided instead equating to 650 dwellings per year. The total amount to be provided in the period 2006 - 2013 should therefore be 5,200 not 4,600 as set out in the document. Further allocations should therefore be made including land at St. Oswald's Road.</p>
<p><b>1503</b></p> <p><b>Taylor Woodrow Developments</b></p>	<p>Support</p>	<p>Paragraph 4.9</p>	<p>Support paragraph 4.9 which states that sites allocated for housing must be available, viable and suitable. The priority is for developable brownfield land. It is important that all housing sites within the LDF should meet these criteria. A number of allocations do not. Land at St. Oswald's Road should be allocated for residential development.</p>
<p><b>1504</b></p> <p><b>Bellway Homes Wales</b></p>	<p>Object</p>	<p>Paragraph 4.11</p>	<p>Para 4.11 does not pass the test of soundness with regard to criteria (iv) conformity and criteria (vii) coherence, consistency and effectiveness as there would not appear to be a credible published evidence base which demonstrates that all existing commitments will be delivered in their entirety in the period before 2013.</p> <p>It is suggested that an allowance of 10% for non-completion of committed sites be made with additional sites allocated to meet the shortfall.</p>
<p><b>1504</b></p>	<p>Object</p>	<p>Paragraphs 4.15 – 4.93</p>	<p>Paragraphs 4.15 to 4.93 do not pass the test of soundness with regard to criteria (iv) conformity and criteria (vii) coherence, consistency and effectiveness, as there is no published evidence base to</p>

<b>Bellway Homes Wales</b>			demonstrate that all the proposed sites will be delivered in the period before 2013.  An allowance of 10% non-completion should be made and additional sites allocated to meet the shortfall.
<b>1504 Bellway Homes Wales</b>	Object	Paragraph 4.6	Object to housing allocations for Gloucester having been made on the basis of Draft Regional Spatial Strategy figures of 11,500 in the City within the plan period.  Objections have been made to the Draft RSS figures and moreover they do not take into account the most recent revised ONS household forecasts, which are likely to increase housing requirements within the City even further.  Paragraph 4.6 does not therefore pass the test of soundness with regard to criteria (iv) conformity and criteria (vii) coherence, consistency and effectiveness.  Suggest that para 4.6 is changed to clearly state that the housing figures are provisional and subject to change in light of objections to and subsequent amendments of the SWRSS prior to its adoption.
<b><u>Policy SAD.20 – Kingsholm Rugby Club Ground</u></b>			
<b><u>Paragraphs 4.19 – 4.30</u></b>			
<b>0171 Bovis Homes Limited</b>	Support	Policy SAD.20 - Kingsholm Rugby Club Ground	The overall approach is supported however this site has building or planning constraints that make their delivery within the plan period questionable. It is almost inevitable that the delivery of this site will fall beyond that anticipated timeframe. We request that this timeframe is regularly reviewed and updated.  Failure to deliver this site, and others (see other comments) could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.  We would like to withhold further comments on this site.
<b>0445 Environment Agency</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	We are unable to support the inclusion of this site for residential purposes as it lies within Flood Zone 3. The sustainability appraisal for this document recognises this but does not consider the flood risk to be a significant constraint to development. We cannot see how this conclusion can be made with no flood risk sequential test to establish that no other site is available in a lower flood risk location.
<b>0323</b>	Object	Policy SAD.20 - Kingsholm	Also page 33 table 1

<b>Network Rail</b>		Rugby Club Ground	<p>The inclusion of the Kingsholm Rugby Club site in the Council's general housing allocations at this stage implies that the land may be available for development within 5 years. The document states, in para 4.7 that the Council is required to identify a five-year supply of developable 'housing' land from the proposed date of adoption of the DPD.</p> <p>Given the lack of any evidence that the development of a new rugby ground on the (Northern) Railway Triangle site is viable (as the feasibility study is some months off and there is no other alternative if this study proves negative) it is premature to include the allocation for housing development in the DPD as the site is unlikely to be available within the five year+ time period. Paragraph 4.9 goes on to state that sites must be available, suitable and viable. Other sites, which may be more readily available for residential development, should be included if the Table to is be robust. If the feasibility study proves negative, then the rationale for including allocations for the development of a stadium on the Railway Triangle site and the housing allocation on the existing stadium site in the LDF documents is questionable. Paragraph 2.15 of PPS 12 requires that the identification of sites should be founded on a robust and credible assessment of the suitability, availability and accessibility of land for a particular use of mix of uses".</p> <p>Changes sought:</p> <p>The Kingsholm site should be removed from the table as without any clear alternative option for the stadium's viable relocation at present it is unlikely to come forward for residential development within the 5 year period.</p>
<b>1442</b> <b>Cavanna Homes (South West) Limited</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	Object to the allocation of this site for housing. The availability of this site is dependent on the relocation of the Rugby Club, which it is understood will not occur in the near future. Due to the current status of the site it should not be allocated for housing at the present time.
<b>1443</b> <b>Brasenose College</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	<p>Objection is raised to the allocation of Kingsholm Rugby Club Ground for residential development. Gloucester Rugby Club is located at grounds on Kingsholm Road, and has been for around 60 years. The site was previously allocated in the 2001 Local Plan as a result of its sustainable previously developed location. The Site Allocations and Designations (Non Central Area) Preferred Options paper again allocates the site, though a site-specific obligation is attached that requires the re-location for the rugby club to a suitable accessible location.</p> <p>We consider that in no way or form does this site constitute a 'developable' site that meets the requirements of the emerging PPS3. The site is not available as it is currently home to Gloucester</p>

			<p>Rugby Club, nor is it likely to become available in a short time frame as a replacement ground has to be located and built before the old one could be re-developed.</p> <p>This is reinforced by the fact that the rugby club is currently seeking approval for a new stand with a capacity of 7488 people. The application is a revision of a scheme permitted in 2004, and is currently being dealt with. Clearly this indicates the club's intention of remaining at its existing location, and does not imply that the site will be coming forward for housing in the immediate future.</p>
<b>1452</b> <b>Sylvanus Lyson's Charity</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	<p>Kingsholm Rugby Club - Policy SAD20. The development of the Kingsholm Rugby Club is dependent on the relocation of the rugby club. There is no firm commitment to its relocation, and the rugby club has only expressed a desire to move to a new ground. There appears to be considerable doubt about the feasibility of its relocation. We do not question its suitability for residential development per se but we do question whether it will realistically make any contribution towards housing provision in the period covered by the LDF.</p>
<b>1311</b> <b>Kingsholm And Wotton Neighbourhood Partnership</b>	Support	Policy SAD.20 - Kingsholm Rugby Club Ground	<p>The Kingsholm and Wotton Neighbourhood Partnership discussed the potential re-development of the rugby ground at their meeting on 19.08.2006. Whilst we support potential use for housing we would ask that the site be used for family housing preferably with some affordable housing to help young families in our area.</p> <p>There are enough flats!</p>
<b>1430</b> <b>Mrs H Roberts</b>	Support	Policy SAD.20 - Kingsholm Rugby Club Ground	<p>The building of houses on this land has occurred to me as it is in such an excellent site inside the city of Gloucester.</p> <p>My only comments are that consideration is given regarding the flooding issue with the River Twyver that runs at the edge of the car park currently. I am not sure if there are environmental issues regarding how close properties can be sited close to a river. Also the two sycamore trees that that sited almost opposite the bottom of mine and next door's houses (23 and 21 Serlo Road) for preservation.</p> <p>And also, if building is considered on this site during the future that consideration be given to the local residents in respect of waste skips etc being sited away from the end of our properties. In the past I have had problems with waste sited in a skip at the end of my property when children had gotten into there and threw paint tins and lids in the river/over the fences.</p>
<b>1581</b> <b>The Occupier</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	<p>Object to allocation of Kingsholm Rugby club for residential purposes.</p>

<b>1503</b> <b>Taylor Woodrow Developments</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	Object to allocation of site for housing. The site is not 'developable' as a replacement ground has yet to be located. The rugby club is currently seeking approval to provide a new stand indicating its commitment to remain at its existing location. The allocation is unsound and should be removed.
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	Kingsholm Rugby Club does not currently have planning permission for residential development and could only be delivered as part of a larger regeneration project which has no identified time scales.  It is possible that flood constraints affect the site.  Sites which are not physically constrained should be considered in order to ensure that adequate housing can be delivered. The Gospel Hall site has no known physical constraints.
<b>1509</b> <b>Mr &amp; Mrs W Thomas</b>	Object	Policy SAD.20 - Kingsholm Rugby Club Ground	Object to proposed allocation of Kingsholm Rugby ground for residential purposes owing to the impact on the existing highway infrastructure. Deans Way already experiences problems with on street parking by commuters who use it as a free car park.
<b><u>Policy SAD.21 – Clifton Road Triangle</u></b>			
<b><u>Paragraphs 4.31 – 4.42</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.21 - Clifton Road Triangle	The overall approach is supported however this site has building or planning constraints that make their delivery within the plan period questionable. It is almost inevitable that the delivery of this site will fall beyond that anticipated timeframe. We request that this timeframe is regularly reviewed and updated.  Failure to deliver this site, and others (see other comments) could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.  We would like to withhold further comments on this site.
<b>0445</b> <b>Environment Agency</b>	Comment	Policy SAD.21 - Clifton Road Triangle	Site obligations in respect of contaminated soil or groundwater should have regard to long term monitoring (e.g. monitored natural attenuation) to ensure the wider environment is unaffected and that remedial objectives will be achieved. Whilst this may be achievable through planning conditions, time scales may require a legal agreement. This should apply to all sites where potential contamination is an issue.

<b>1442</b> <b>Cavanna Homes (South West) Limited</b>	Object	Policy SAD.21 - Clifton Road Triangle	Object to this site being allocated solely for housing. The site is more suited to a mixed-use development scheme. This island site borders the divide between the residential and commercial uses in the area. Bristol Road would benefit from active commercial frontage. We therefore propose the retention of an employment or retail use on the site with some residential development. A mixed-use scheme would reduce the capacity of the site and additional allocations should therefore be made elsewhere.
<b>1443</b> <b>Brasenose College</b>	Object	Policy SAD.21 - Clifton Road Triangle	<p>Objection is raised to the allocation land at Clifton Road Triangle for residential development. The site represents previously developed land in a sustainable location, and is therefore cited as being a suitable location for residential redevelopment. However, it is stated that the site is potentially contaminated and a suitable investigation, risk assessment and remedial strategy will be required to ensure safe and suitable development. We also understand that the site lies within the floodplain, and that an FRA will be required to establish the extent of flooding and mitigation measures where appropriate.</p> <p>These issues lend an element of doubt on the future of the site, and in particular, its capacity. We believe that the site may not be capable of providing 65 dwelling units as a result of the flooding issues, and until this is clarified the site cannot be relied on as a viable available option. Further work should be carried out to establish the site's realistic development potential; until this is complete the site should not be allocated as land within the five year supply.</p>
<b>1452</b> <b>Sylvanus Lyson's Charity</b>	Object	Policy SAD.21 - Clifton Road Triangle	The Clifton Road Triangle - Policy SAD21. The Clifton Road triangle site is occupied by existing businesses and is likely to be in multiple ownership. As a result, the site will only be available for development when arrangements have been made for the relocation of existing occupiers. The council has not demonstrated that this site is genuinely available and deliverable by 2013.
<b>1503</b> <b>Taylor Woodrow Developments</b>	Object	Policy SAD.21 - Clifton Road Triangle	Object to the allocation. The site is previously developed and is in a sustainable location, however the policy indicates that the site is potentially contaminated. We also understand the site lies in the floodplain and that a Flood Risk Appraisal will be required. These issues lend an element of doubt on the future of the site and in particular its capacity. Further work needs to be carried out and the site should not be included as an allocation within the 5-year housing supply.
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.21 - Clifton Road Triangle	<p>Part of this site lies in the floodplain.</p> <p>The development potential of the site is likely to be limited by the existing adjacent uses.</p> <p>There are highway implications in developing the site and off site highway works.</p>

			Sites that are not physically constrained should be considered in order to ensure that adequate housing can be delivered. The Gospel Hall site has no known physical constraints.
<b><u>Policy SAD.22 – Land at Clearwater Drive</u></b>			
<b><u>Paragraphs 4.43 – 4.55</u></b>			
<b>0136</b> <b>Mr D Jellyman</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Yet another example of the Council's determination to sell land to the highest bidder in order to concrete over as much green space as possible to collect more Council Tax. The document indicates a lack of open space in Quedgeley so why build on what is left?
<b>0262</b> <b>Mrs Debra Gills</b>	Object	Policy SAD.22 – Land at Clearwater Drive	I note in appendix 1 that Clearwater drive is a grade B equivalent to Robinswood Hill, Sudmeadow, Matson Wood and Gloucester Golf Course. I understand that this is due to the multitude of breeding amphibians, birds and butterflies. This piece of ground is extremely important as a whole to the Quedgeley community where we socialise, exercise ourselves and our dogs in nature with respect for wildlife. Any housing would have a devastating effect on this. A shortage of public open space has been identified, an increase of 30 houses will lead to an increase of a possible 120 people and 60 cars with less open space. These houses will flood, as have the houses in Highclere road during the last winter due to the insufficient drainage from the area, as the whole of Quedgeley, drains through these fields and brooks. It is noted as flood plain on your map. Will the developers point this out to any purchaser?  Please do not build on this land.
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.22 – Land at Clearwater Drive	The overall approach is supported however this site has building or planning constraints that make their delivery within the plan period questionable. It is almost inevitable that the delivery of this site will fall beyond that anticipated timeframe. We request that this timeframe is regularly reviewed and updated.  Failure to deliver this site, and others (see other comments) could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.  We would like to withhold further comments on this site.
<b>0445</b>	Support	Policy SAD.22 – Land at	Given the shortage of public open space within Gloucester, we consider this site should come forward as POS. However we appreciate that a small allocation may secure enhanced POS.

<b>Environment Agency</b>		Clearwater Drive	As identified within the sustainability appraisal, the site is partially located within Flood Zone 3 and therefore a suitable flood risk assessment will be required.
<b>0153</b> <b>Mr P Reed</b>	Object	Policy SAD.22 – Land at Clearwater Drive	I am writing to object to the plans to build residential homes at Clearwater Drive. Firstly because there is not enough open green space in Quedgeley already and losing this would be a great loss as it is a lovely area and homes a lot of wildlife. Also traffic would increase and if an access was gained through Aspen Drive we would lose a quiet safe area for my children and others to play within the cul-de-sac.
<b>0156</b> <b>Mr A Chapman</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>I am saddened the proposal for Policy SAD22 - Clearwater Drive. Your preferred option is to build on some of the site and leave the remainder as public open space.</p> <p>Looking at the map I note that approximately 60-70% has been allocated to housing leaving the remainder as open space. I also note that some of the housing allocation is to be on the flood plain.</p> <p>I don't profess to be a civil engineer but I can't help feeling that building in this area will have dire consequences both for the residents of the new houses and the wildlife who's habitat will be further destroyed. The removal of the blackberry bushes and shrubs at the top of the site a couple of years ago resulted in a significant reduction in the number of migratory breeding birds and the residential house sparrow population is now confined to the hedgerow running alongside the drain.</p> <p>I suspect that draining the residential area will increase the water level in the area allocated as open space. This will result in the loss of over-wintering birds such as Snipe, Waterrail and the rare Jack Snipe (The Clearwater area is one of the best areas to see this elusive winter visitor). The effect on the local amphibian population would also be drastic.</p> <p>The top of the site is one of the few areas in Quedgeley that the public can allow their dogs (and themselves) to exercise away from the traffic. It also provides opportunities for the public to meet one another, enhancing the sense of community within our village.</p> <p>I realise that you are under pressure from central government to provide housing for our ever increasing populous and I don't want to be accused of "Nimbyism", but I ask you to please reconsider your preferred choice and opt instead to retain the whole area as open space.</p>
<b>1152</b> <b>Miss A C Balchin</b>	Object	Paragraphs 4.43 – 4.55	<p>The allocation of even part of the land at Clearwater Drive for residential development would make a mockery of the Council's policies for the provision and safeguarding of of public open space and the protection of sites of nature conservation importance.</p> <p>It is acknowledged that Quedgeley is seriously deficient in public open space (paragraph 3.15).</p>

			<p>There is no land in Quedgeley lying between the A38 and the Gloucester-Sharpness Canal which remains undeveloped and which therefore could be used to provide additional public open space - other than Mayo's land, which is also allocated for housing in the preferred options document, and the land at Clearwater Drive.</p> <p>Unlike Mayo's land, the land at Clearwater Drive:</p> <ol style="list-style-type: none"> <li>1. Is already in effect in public ownership (paragraph 2.7)</li> <li>2. Occupies a key position adjacent to the existing Canalside Walk which makes it easily accessible to large numbers of people (paragraph 3.15)</li> <li>3. Is currently used for informal public recreation (paragraph 2.9)</li> <li>4. Is a Site of Nature Conservation Importance Category B (SAD Appendix 1)</li> </ol> <p>In light of these facts it is simply incomprehensible that the land at Clearwater Drive should be allocated for anything other than public open space.</p> <p>The proposal for residential development on part of this land is even more incomprehensible in light of the reasons given for not taking forward the objection site at Wheatridge East as set out in paragraphs 4.119 - 4.125 of the SAD document. The situations of these two parcels of land are closely analogous (save for the fact that Clearwater Drive is not well located in respect of the local district centre) and all the reasons given in respect of the land at Wheatridge East apply with equal force to the land at Clearwater Drive, but the Council has nevertheless reached the opposite conclusion in that case.</p> <p>Further, it would appear from paragraphs 4.273 - 4.278 of SAD that the land at Clearwater Drive is the only site in the whole of Gloucester previously identified for a community use which is not proposed should be reallocated for private development. Yet an additional 30 houses in this location scarcely justifies the permanent loss of the only potential public open space in an area where there is an admitted shortfall in public open space provision.</p> <p>The inconsistencies in the Council's approach to the land at Clearwater Drive are indefensible. The allocation should be deleted.</p>
<b>1181</b> <b>Mrs J L Taylor</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Object to the proposal on the following grounds: loss of site proposed for a school, loss of public open space, no need for further housing in the area, local infrastructure cannot cope, loss of wildlife interest including bats, the site is not sustainable in terms of car use, the impact of the Kingsway development should be fully assessed before more houses are considered. If housing does go ahead it should be housing for the elderly given the ageing population. Development should be postponed for 5 years.

<b>1381</b> <b>Carol Spear</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Strongly against any development at Clearwater Drive. It is an important local amenity.
<b>1385</b> <b>Dr Glen Rayner</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Strongly object to the proposal to build residential homes on open land next to Clearwater Drive in Quedgeley.</p> <p>This is an important area for maintaining the local community's quality of life - for example through recreational use. Quedgeley has a shortage of open spaces.</p> <p>This would also increase traffic on local roads.</p>
<b>1386</b> <b>D Connolly</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Object to building on this land. Quedgeley is already heavily populated and there is already a shortage of open spaces for recreation activity. It would also increase the level of congestion in the area.
<b>1437</b> <b>T Rawlinson</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>I am writing to object to the plans proposed for the development on the land adjacent to Clearwater Drive in Quedgeley.</p> <p>This piece of land is a great asset to Quedgeley and is used on a regular basis by many of the surrounding residents. This small piece of land is often occupied by Dog walkers, children playing, families exploring the wildlife and many other outdoor activities. The land is one of the last remaining Open spaces in the area.</p> <p>Quedgeley is losing its community feel with now over 5,600 houses and a population of nearly 12,000 people, it is fast becoming a Concrete 'town' rather than a village, with less and less places to spend some quality time with your family outdoors.</p> <p>As you will already be aware, Junction 12 on the M5 is extremely congested due to the current number of cars leaving and returning to Quedgeley and Hardwick. As a driver myself I often have to continue to the next available junction to avoid the danger of queuing on the hard shoulder of the motorway and risking my life to return home.</p> <p>I feel that adding more housing to Quedgeley will only make this situation worse. With 13 crashes since the junction opened in November 2002 and with hundreds of new houses being built in the Kingsway Development and planning for a further 1,700 houses at Hunts Grove in Hardwick, why would we need to add a few more houses on the valuable open space we do have left in Quedgeley.</p>

			<p>Amenities in Quedgeley including our Doctors and schools are also becoming overcrowded. Finding a parking space in Tesco or one of the local stores during the weekend can be very difficult. I can only imagine this is set to get a lot worse over the next few years.</p> <p>Many of the houses surrounding the land have small gardens and the residents enjoy the open space that this area provides, along with the safe area for their children to play, It would be such a shame to lose such as lovely area within Quedgeley. Especially when Gloucester as a whole is already deficient in public open space.</p> <p>It seems that the council are keen to hold onto our Open space and understands the important role it plays in the community, as the following quote shows on the website " In an increasingly pressured society, open space, sport and recreation are acknowledged to be important components of civilised life, contributing to health and well-being of the individual whilst having valuable social, economic and educational roles. It is a key objective of this plan that everyone has access to the appropriate amounts of open space, sport and recreational facilities to meet present and future needs"</p> <p>I really do hope that the council will choose to keep this piece of land free from development and allow Quedgeley the time to absorb the impact that the other developments will have on the area, without also allowing a small and pointless development to go ahead on one of the last remaining open spaces that residents enjoy in the area.</p>
<b>1442</b> <b>Cavanna Homes (South West) Limited</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Support the retention of this site as public open space due to local shortages in Quedgeley. This area should not be allocated for residential development as this would significantly reduce the proportion of open space on this site, losing one of the few areas of open space in this location. Additional housing allocations should therefore be made elsewhere.
<b>1450</b> <b>Gloucestershire County Council</b>	Support	Paragraph 4.46	<p>Support but clarification is required to make the comment less subjective.</p> <p>Amend: "The County Council has confirmed that the site is not required for education purposes and have proposed that it be developed, in conjunction with the adjoining City Council owned land, partly for housing and partly public open space, recreation, wildlife and amenity space to improve the use value and quality of the location."</p>
<b>1450</b> <b>Gloucestershire County Council</b>	Support	Paragraph 4.48	<p>Support underlying principle but object to subjective manner of paragraph.</p> <p>Amend: "This policy will help to provide additional formal and informal amenity and recreation areas and improve the economic use value of the land whilst also providing new improved formal areas of public open space."</p>

<p><b>1450</b></p> <p><b>Gloucestershire County Council</b></p>	<p>Support</p>	<p>Paragraph 4.49</p>	<p>Support principle but object to subjective nature of wording.</p> <p>Amend: "The new public open space that could be provided through the draft allocation would be a positive and tangible benefit to the community as a whole as there are no school requirements as they are met by adequate and sufficient facilities elsewhere. It would also allow the nature conservation and enhancements interest of the site to be managed in an improved and more effective manner."</p>
<p><b>1452</b></p> <p><b>Sylvanus Lyson's Charity</b></p>	<p>Object</p>	<p>Policy SAD.22 – Land at Clearwater Drive</p>	<p>Land at Clearwater Drive - Policy SAD22. It is noted that the land at Clearwater Drive is potentially contaminated. It is possible that the cost of remediation will render this site unviable. Even if the site can be developed for housing, the abnormal costs could have an impact on the ability to provide affordable housing.</p>
<p><b>1454</b></p> <p><b>Mr S F &amp; Mrs S P Finney</b></p>	<p>Object</p>	<p>Policy SAD.22 – Land at Clearwater Drive</p>	<p>I wish to contribute to the consultation about building on the vacant ground off Clearwater Drive, Quedgeley. I note that a very thorough evaluation has already been conducted, which recognises the value of the area as a natural habitat, and the fact that Quedgeley is already short of the quantity of open space it should provide for its residents. I note that in recognition of these facts, a limited amount of housing is proposed.</p> <p>My points are as follows. Why is it that with all the reasons for not building on the area duly recorded, there is still any need to build on it at all? Are you under some financial arm-lock from wealthy developers who will threaten to bankrupt you with court action you cannot win? If that is the case they should be named and shamed in the press.</p> <p>If you build houses on a portion of the area, then that will have a negative effect on its value as a natural habitat; imagine the light pollution of yet more street-lighting, illuminated windows, and automatic security lighting coming on every time an animal moves. Furthermore, you stress that only limited vehicular access and parking will be provided for the new houses, and that the remainder of the associated vehicles must park on the road. But Clearwater Drive is too narrow and unsuitable to have a permanent row of cars down the side (or both sides, heaven forbid). It will lead to children bursting out into the road between parked cars and into the path of oncoming vehicles, whereas if you leave the site as it is there will be plenty of area for play and recreation, and plenty of scope for children leaving the site to see whether the road is clear.</p> <p>Please do not bow to pressure from people who simply want to make even more money by covering every last bit of green with concrete and brick. These 'developers' have their own mansions with vast gardens, of course. The King's Fund recently undertook research which showed 'an increased likelihood of mental health problems amongst those deprived of access to green spaces'. Please do</p>

			your best for Quedgeley by allowing not total obliteration of this open area, not partial obliteration with its disproportionate spoiling effect, but no obliteration, no development at all. Why can't it stay exactly as it is?
<b>1464</b> <b>Mrs Deborah J Holley</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Object to the proposed plans to build homes on the open land off Clearwater Drive, Quedgeley.  Surely there are enough new properties in Quedgeley...particularly with the Kingsway development.
<b>1435</b> <b>Tracey Sandford &amp; Ryan Naughton</b>	Object	Policy SAD.22 – Land at Clearwater Drive	I strongly object to the proposed development on land at Clearwater Drive. My partner & myself live at 7 Brockeridge Close. I have lived here for the past 10 years & during this time have enjoyed the "green space" for many reasons, the wildlife, walking the dogs seeing children play, socialising with other users of this land. I value this open space, we have so little left in Quedgeley.
<b>1440</b> <b>David &amp; Jenny Mandeville</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>I am writing to air our concerns about the proposed development of the public open space near Clearwater Drive. Apart from our purely personal concerns, which are unlikely to affect the decision (ie. loss of view and possible increase in traffic if the ransom strip problem in Aspen Drive is overcome) we have more concerns that could affect the existing community.</p> <p>At present the area has an informal natural beauty within the surrounding estates. Though not a huge area, it gives the community a feeling of being in the countryside. We regularly walk all around the Quedgeley area, moving through the estates to pick up the Nature Reserve and other small wooded areas within Quedgeley. The canal footpath gives another good walk, but we do enjoy walking through and past the Clearwater area as it gives a more open 'common land' type feel. The proposed development would not only reduce this feel of openness, but also transform it into a made-up 'fake' park.</p> <p>Quedgeley has recently gained the prospect of improved playing fields with great facilities. It has a skate park and a multi-purpose sports area. It has many areas dotted about for young children to play on swings, slides and roundabouts. What the Clearwater site brings to the community, is an open area that parents can walk their children through to enjoy the feeling of being outdoors in the 'wild'. For a small child, such an area is another land. They can experience a different sort of nature, without parents having the potential stress of getting them strapped up in a car, preparing gear for a longer time away from home, driving a number of miles and then finding suitable parking. It is within walking distance – welly's on and out the door. Children need to be given different experiences, not just 'made-up' outdoors, but real outdoors. Reducing the Clearwater area, through development, will take away that feeling of 'open' space.</p>

			<p>Given its countryside nature, there is little litter within the area compared to other open areas. There is no apparent crime, or gathering of young people to give a fear of crime. People like that tend to gather around formal play areas where they are not going to suffer the discomfort of potentially wet feet. A formalised play area would be difficult to maintain against vandalism and graffiti, which would immediately spoil the 'made-up' area.</p> <p>Reducing the area will also result in encroachment on the wildlife, you talk about protecting, in the area. Your plans discuss the enhancement of the area for the benefit of the existing habitat. However, the existing habitat is obviously there because it likes things the way they are. By putting man-made ponds and wetland in the area, building houses nearby and adding a children's play area, surely you are going to frighten away any wildlife that exists. You may attract other wildlife, but again this would not be conservation. It would be the introduction of new species, which once more, would frighten away the existing species and affect the flora/fauna of the area.</p> <p>Your plans frequently highlight a beneficial aspect due to enhancing the health of the local community. Since the area that is being left as open space is going to be on the floodplain area, and is proposed to be made into wetland and attenuation ponds, how is this going to increase the potential for the public to increase their activity levels any more than the area does at present? Also, with the new ponds and wetland areas made as features to the new development, would this not be potentially hazardous to children playing outside their new homes? Or are you planning to put fencing around these areas? How would this promote the conservation of the existing habitat?</p> <p>I thank you for taking time to read about our concerns, and hope you will take time to further investigate the potential detrimental effect the proposal could have on community life within Quedgeley, especially since your report consistently highlights the fact that the development is only for 30 houses. The report also highlights that with this quantity of houses the level of impact on homelessness, affordable housing and employment is low.</p>
<b>1453</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>I strongly object to any further residential development at Clearwater Drive happening. We as Quedgeley residents have very few open spaces left, and besides we were assured this land was going to be a nature reserve. The initial idea of the land being used for a school was abandoned due to the fact that piling would be required as the land is very marshy.</p> <p>We value and use this rare bit of green space and certainly don't want any further houses being built. This would create extra traffic/pollution and besides the road infrastructure can hardly cope at present, the motorway junction is simply inadequate without any further traffic. Lets not just stuff further houses in to what is fast becoming known as Lego land.</p> <p>Quedgeley is full already.</p>

<p><b>1473</b></p> <p><b>Jo Brown</b></p>	<p>Comment</p>	<p>Policy SAD.22 – Land at Clearwater Drive</p>	<p>It seems that the intention is to have the main vehicular access via Clearwater Drive although Aspen Drive is mentioned as having a random strip across the end of it. This seems to suggest that access will be made possible via Aspen Drive if possible. I would like to point out that any access through here would cause more problems at the mouth of Aspen Drive. This is already a very busy area as it feeds Brockridge Close, Eldersfield Close, Highclere Road, Acer Grove, Downey Close. A lot of people are also forced to park at the top end of the road because they own flats or they are visiting people - and it can be dangerous on this road at peak times without adding further cars. Also, if there is only to be 1.5 parking units per house then a lot of vehicles will be parking along the corner of Eldersfield, Brockridge and Aspen - and this is already filled with residents cars every evening.</p> <p>The brief suggests that by putting 30 houses onto an area of natural wildlife it will improve it. As it is currently designated a key wildlife site by the Gloucestershire Wildlife Trust will this be taken into consideration when building on the land? The brief also states that there are few remaining areas to correct the poor distribution of public open space. Surely by leaving this land as it is then it already is an area for play and open space. Building 30 houses on this area does not increase the distribution but decreases it.</p> <p>With all of the new houses being built in the area, there is a big concern amongst residents of Quedgeley that facilities such as doctors surgeries, dentists, shops etc are already oversubscribed to and, as the children from this development would want to attend local schools, this will also put further strain on them.</p>
<p><b>1474</b></p> <p><b>Mr Ian M Smith</b></p>	<p>Object</p>	<p>Policy SAD.22 – Land at Clearwater Drive</p>	<p>Object strongly to further development on this site.</p> <p>Firstly, Quedgeley has very few open spaces and it would be detrimental to the village to lose such a valuable local asset that currently the whole community can enjoy for recreational purposes. Indeed, I find it puzzling that the Council should even be contemplating development on this site when taking into consideration the Government guidelines on such areas. I refer to DCLG PPG17: Planning for Open Space, Sport and Recreation, which sets out the Governments policies for the protection and creation of open spaces, sports and recreational facilities:</p> <p>'Open space and sports and recreational facilities that are of high quality, or of particular value to a local community, should be recognised and given protection by local authorities through appropriate policies in plans. Areas of particular quality may include:</p> <ol style="list-style-type: none"> <li>1. Small areas of open space in urban areas that provide an important local amenity and offer recreational and play opportunities</li> <li>2. Areas of open space that provide a community resource and can be used for formal and informal</li> </ol>

			<p>events such as religious and cultural festivals, agricultural shows and travelling fairs. Travelling fairs may also require suitable winter quarters; and</p> <p>3. Areas of open space that particularly benefit wildlife and biodiversity.</p> <p>This guideline is surely especially relevant due to the 'nature conservation interest of the site' (Gloucester City Council quote) and if this development were to proceed, the tiny amount of open space left available for the nature reserve is frankly farcical.</p> <p>Secondly, as a resident of Quedgeley, I am only too aware of the immense strain that the transport infrastructure is currently under. The sheer volume of traffic hitting Severnvale Drive/Bristol Road/M5 J12 at peak periods and the traffic jams that ensure are already a source of misery for residents and so adding further to the traffic load in this area is particularly disagreeable.</p> <p>Thirdly, the local services in the area are also overstretched with Tesco being the only major shopping centre in the area. The capacity of this facility is increasingly inadequate to service the number of existing Quedgeley residents who are reliant on it, as anyone who has attempted to do shopping at the supermarket would probably testify. Again, more housing at Clearwater Drive can only fuel the current problem.</p> <p>Lastly, the loss of one of the precious few areas of public open space (let alone a conservation area) in Quedgeley to yet more housing would be particularly objectionable when there are such large scale housing developments currently underway at Kingsway and Hunts Grove which surely must be addressing the area's so called 'housing shortage'. Therefore, I question the necessity of the sacrifice of this land by Quedgeley residents when taking into consideration the other developments in the area.</p>
<b>1476</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>I would like to lodge my objection against the above proposal.</p> <p>With regard to natural surveillance from new housing, my property already overlooks the open field.</p> <p>The land is one of the few open spaces in Quedgeley where children can play, dogs can be walked and residents can exercise.</p> <p>With the exception of the summer months, the wetlands are too wet to walk on. The dry, walking area, is where you plan to build the houses which means we would lose the recreational green space.</p> <p>Natural surveillance is provided without houses.</p>

			<p>The natural habitat of various plant and animal life would be destroyed.</p> <p>Residents and children should be allowed easy access to green open space without the need to get into a car to find it.</p> <p>More houses will increase the traffic congestion on Severnvale Drive, Fieldcourt Drive and Bristol Road. Quedgeley cannot cope especially with the traffic generated from the new Kingsway Development.</p> <p>It states in the consultation documents that the proposed properties will be sites so that they do not cause adverse impacts to the current residents in terms of overlooking, loss of privacy, overshadowing and overbearing. I find it hard to believe that the concerns of the local residents are considered.</p>
<b>1480</b> <b>Mr Steve Ambrose</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>My home is at 18 Eldersfield Close. At this present time, if I look out of my property i have a large open area of green. I presume, since you plan to place 30 houses there that the back of the new houses will be facing the front of my property. If this is the case I would be quite concerned. To the rear of my property I am surrounded by back gardens. Just normal talking in my garden can be heard three gardens away. Therefore parties etc, especially in the summer, can be wearing on the nerves. At this present time I can escape to my front bedroom. In your proposals you state there will be no disruption to existing property owners. Having back gardens facing the front of our house would definitely be an inconvenience for me.</p> <p>You may feel this is an insignificant point but if you were to converse with my neighbours they would confirm that to the rear of our properties is a soundtrap.</p> <p>I would also like you to confirm that the 30 houses proposed will not be council or housing association. I do appreciate that both council and housing association properties are a necessity but I have no wish for my property to be devalued.</p>
<b>1482</b> <b>Miss S Padam</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Object. Quedgeley has so few open green spaces and places for animals and children to play. The site is awash with cowslips and other wild flowers in the spring and summer.</p>
<b>1378</b> <b>K Gilonis</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Strongly object to the plans for develop land at Clearwater Drive.</p> <p>This is one of the last remaining areas of open space in Quedgeley - particularly with the new Kingsway development taking shape. The children need the open space to play - otherwise they will have to play on the roads.</p>

			<p>Worries over the loss of wildlife and amenity areas for example as a place to walk dogs and ride bikes.</p> <p>Concerns over the loss of view.</p>
<p><b>1415</b></p> <p><b>Amanda Tiley</b></p>	Object	<p>Policy SAD.22 – Land at Clearwater Drive</p>	<p>I am a resident of Quedgeley and am horrified to have recently learnt that the above land is going to be subject to building. I use this piece of land twice a day to walk my dog (along with many, many other local residents) and am amazed that the Council are going to allow one of the few large open spaces left in Quedgeley to be built on. Why is this necessary when there are already 2000 houses in the process of being built on the other side of the Quedgeley bypass and another 1500 in Hunts Grove in Hardwick?</p> <p>The Council is fast allowing Quedgeley to becoming a metropolis of densely populated housing, whilst seemingly retaining little character and open space. I cannot believe that the Council is that desperate for housing that they will approve this site for building just for the sake of squeezing on a few dozen more houses and whilst have total disregard for the opinions of those already living in the area. I understand that the land is soon to be public ownership. I suspect that the majority of the public residing in Quedgeley, if asked, would not wish for further housing to be built on this land.</p> <p>Is it absolutely essential that this land be used for housing? I strongly believe it will have a huge impact on Quedgeley residents particularly those like myself who are dog owners, those who simply enjoy walking in that area enjoying the wildlife that appears to flourish on this site or children who can play safely on the area. .</p> <p>I have read your planning document and do not think that leaving a smaller section of the wetland nearer the canal for public use is acceptable. I assume that this is not actually suitable for building in any case and will therefore be used as a useful tool to placate those who dispute your plans.</p> <p>I do hope that you will reconsider the use of this land and I would like to be informed of any forthcoming public meeting relating to this decision.</p>
<p><b>1393</b></p> <p><b>Mrs Jane Bricknell</b></p>	Object	<p>Policy SAD.22 – Land at Clearwater Drive</p>	<p>Object on the following grounds:</p> <ol style="list-style-type: none"> <li>1. There is a lack of space which can be overlooked and there by safer for Children of many ages to play on!</li> <li>2. Lack of space for those who which to both walk in reasonable safety and walk their dogs without having to use a canal toe path which has many hidden potential dangers!</li> </ol>

			<p>3. Since the development of the surrounding area and particularly over the last four or five years, the area in question has become a haven for many species of wild life, these range from many different coloured Dragon Flies to Badgers and not to mention the wide verity of birds which also includes a Hawk which hunts the field from time to time. The flora and fauna is also quite abundant and includes the protected cowslip.</p> <p>4. The evidence which bolsters the arguments against redevelopment of this land can also be seen in the amount of cars which bring other local people to the field for all sorts of recreational purposes, so it is not just the immediate vicinity which benefits from this land. As an idea of how popular this land is I have attached some photo's, which were taken over a few hour period on Friday 8th September 2006 and in which it can be clearly seen that the loss of this land will affect people of ALL ages.</p> <p>5. It could be argued that the close proximity of the canal and it's lovely walks and the field 1/2 a mile away should suffice the needs of many, to this I can only say that in broad day light my eldest Daughter was flashed at by a pervert (crime incident No can be supplied), any responsible parent would not send their children 1/2 a mile away to play, the safety of this field could easily be recognised by pulling Police statistics on local incidents in the area and it is my bet that there has been none on this site due to it's surrounding dwellings and open aspect.</p> <p>In conclusion, the loss of this relatively small site would diminish the quality of life for many woman, children and those of us who enjoy it's natural bounties. The destruction of those habitats which dwell there upon, all be it taking just half that land, will erase it forever, the area is in harmony with nature as much as it can be given the surroundings and that is just the way it should stay as development will put the children on the streets with allot more cars adding to the dangers they face already when crossing the roads. See for your selves, not during office hours but after school, evenings and weekends when the facility is being used on a minute-to-minute basses.</p> <p>Images provided.</p>
<b>1406</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Strongly object to housing development on Clearwater Drive. There already isn't enough open space in Quedgeley.
<b>Mr Philip Jenkins</b>			
<b>1409</b>	Object	Policy SAD.22 – Land at Clearwater	We wish to object to the proposed development on land adjacent to Clearwater Drive.
<b>K &amp; S Parish</b>			Apart from the obvious facts there this area is already over developed with very little (and if the council

		Drive	has its way) ever diminishing green space and the fact that there is already an inadequate public infrastructure to support more homes, the area to be developed is on land that has public right of way access. Although signs were erected a few years ago in an attempt to counter this access they were erected outside of the legal permissible timescales for this type of action and are therefore invalid.
<b>1410</b> <b>Brenda Gillott</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Having purchased a property at the causeway-clearwater drive interchange last summer, I was horrified to discover that the field opposite has been given the go ahead for development. One of the deciding factors for purchasing this property was the fact that the area has an open space for recreational use, and due to the built up nature of surrounding area, we considered to be an asset. Due to the continued development of Quedgeley in general, these open spaces are now few and far between. The Clearwater Drive area has enough problems from passing through traffic as it is, without the addition of more housing. Surely this small piece of land could be spared for the local residents to enjoy. How many more houses could you cram in to such a small area_ The field has a large selection of wildlife that we all enjoy. You will be destroying yet another canal side natural habitat. The construction traffic alone will be a major problem. We urge you to reconsider.
<b>1411</b> <b>Mr Roger Bell</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Following notification of proposed development for land off Clearwater Drive, I would like to voice my strong opposition to this form of usage on this parcel of land.</p> <p>As I believe the land is a parcel of three pieces of land that was handed over from developers, for community usage, and I believe that the proposed usage at that point was for use as a school. I can understand that there is no longer the volume of children to justify this usage.</p> <p>The area has evolved over the last 10 years to be a very large housing development and currently has very limited leisure facilities, I would like to see this addressed and this is the idea opportunity to create something for the community.</p> <p>I am also keen to be re-assured that the level of the land will not be increased from its present level, as this will require substantial land fill and will have a detrimental effect on the environment and the current road infrastructure will be affected. I would also be looking for re-assurance that the trees and existing foliage will be left intact as this will also have an environmental impact on the conservation area directly bordering the site.</p> <p>I would support an appeal to the Secretary of State to overturn the local decision for residential use, I am not opposed to the development of the site but more housing ..No ...lets see something for the community.</p>
<b>1412</b> <b>Mrs Hayley J</b>	Object	Policy SAD.22 – Land at Clearwater	I object to the plans to develop Clearwater Drive. I live in Pendock close and use this open space regularly for walks and access to the canal.

<b>Nicholls</b>		Drive	<p>Quedgeley has very few open spaces and the traffic is bad enough with what houses there are at the moment - I feel that this development of land is unnecessary.</p> <p>I would also be interested to know if any of the houses being built on the above land are planned for social housing?</p>
<b>1413</b> <b>Amy James</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Object to the development of Clearwater Drive. It is an area full of children and to take away yet another area for them to play in to build yet more homes seems uncalled for, particularly with the Kingsway development going ahead.</p> <p>The area should be left for nature.</p>
<b>1414</b> <b>Stella Freemantle</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>I am writing to you with regard to the current plans to build further residential homes on the land at Clearwater Drive and would like to stress my strong concerns with regard to this. The obvious main objection, living in Pendock Close, is the increase to an already extremely busy link road serving the various roads off of Clearwater Drive, where we take our lives in our hands trying to cross out of or into our road.</p> <p>Of course there is also the fact that original purchasers on the surrounding estates were assured at the time of purchase that this piece of land was to be used to build a school and that the Council had no intentions or need to add to a very large housing estate. Further to this fact, with the addition of the vast amounts of housing currently being erected on both sides of the A38, is there really any call for more residential accommodation?</p> <p>The land is currently well used by the local children who can safely play in a "green space" without having to cross any main roads and at the present time you will find it is full of natures wonders, including some very impressive Bull Rushes.</p> <p>I really do feel very strongly about this having moved from London five years ago and to live on an estate with my very own piece of the countryside right on my doorstep, so I do hope you will reconsider your plans.</p>
<b>1416</b> <b>Angela Blake</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Strongly object to the development of this land for housing.</p> <p>Parking and traffic congestion is already an issue.</p> <p>Leave the area as an open space to cultivate wildlife.</p>
<b>1417</b> <b>Mr John</b>	Object	Policy SAD.22 – Land at Clearwater	<p>We would like to strongly oppose to the proposed residential development on land at Clearwater Drive, Quedgeley.</p>

<b>Bailey</b>		Drive	<p>It is the last green space we have on this side of Quedgeley, and will be greatly missed by a great deal of people and would reduce wildlife significantly. We get many rare ducks and plants within this area and it is a fantastic walk.</p> <p>We do not need any more houses which would increase traffic, put pressure on our already overstretched local services; doctors, dentists, schools etc. Surely, enough houses are being built on the Westmead sights at Waterwells and Copeland park at Tuffley/Quedgeley?</p> <p>From Local residents Dunlin Close, Quedgeley</p>
<b>1420</b> <b>Mr Iain Donnelly</b>	Object	Policy SAD.22 – Land at Clearwater Drive	This area has been one of question for the council for some time and I believe the intended use of this land was for recreational use. I strongly believe that all of the residents in the surrounding area would agree that instead of being used to build even more homes on it would be better to create a recreational area that can be used by the whole community as there is very little within the area.
<b>1421</b> <b>Mr Mark Rowney</b>	Object	Policy SAD.22 – Land at Clearwater Drive	We have plenty of houses already in Quedgeley and precious little green spaces so I would object strongly to losing some of the few open spaces in a dense sprawl of houses and in an area that I pass through daily on my bicycle and I see many people using for recreation.
<b>1423</b> <b>Mr P C &amp; Mrs S A Offord</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>We object to this application for residential development in one of the last open spaces in this part of Quedgeley for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Two areas have been provided for leisure - one that contains the skate park (off Fieldcourt Drive) and the other that is the 'unofficial' sports field (off School Lane). These are fine for the more active, younger people within that part of the community. The Clearwater Drive space is a far more natural, part meadow, part marsh environment containing numerous trees and a variety of natural plant life. It is enjoyed by an abundance of diverse wildlife. For many years we have enjoyed the quieter aspects of the Clearwater Drive open space.</li> <li>2. The Clearwater Drive open space is the only useful open space for the residents of all areas to the west and north of Severnvale Drive. Other apparently 'green' areas when viewed from the air are the playing fields of Severn Vale School, Fieldcourt School and Beech Green School, none of which of course is open to public access.</li> <li>3. If the plan goes ahead there will be an unnecessary increase in traffic, noise and pollution - not only from construction vehicles and traffic during any development, but particularly from the additional residents resulting from the proposed development.</li> </ol>

			<p>4. Quedgeley is already over-crowded - at busy times it is difficult enough to leave the estate as it is.</p> <p>5. So much other building is currently taking place off the Bristol Road in Quedgeley, and on either side of the Quedgeley by-pass, that the demand placed on existing local facilities and services is already excessive - for example schools, doctors, and dentists are all over-subscribed. We question the need for even more housing in this particular part of Quedgeley, off Clearwater Drive.</p>
<b>1546</b> <b>Mr &amp; Mrs I Spring</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Object to any proposed development at Clearwater Drive.
<b>1490</b> <b>Mr Peter Ponting</b>	Object	Policy SAD.22 – Land at Clearwater Drive	The site was originally designated for a school. It is now a rare wetlands area within Quedgeley. It is time to think about Quedgeley as a community instead of filling it with concrete. The Council has done nothing for Quedgeley except build houses. Aren't there enough houses in Quedgeley already.
<b>1556</b> <b>Mr Brian Webb &amp; Miss Marie Lynn</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Strongly object to any development. It is the only area where all residents can walk their dogs, take their children out for walks and generally enjoy the environment. Noise in the area is loud without adding to it. There are also social issues/problems in this area and do not want to see more created.
<b>1494</b> <b>Miss S L Florence</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Object to proposal on grounds of traffic generation and impact on the local highway network. Also object to loss of open space. The land is a valued recreational area for residents and segregates nature conservation interest. More housing would be detrimental. Also concerned about lack of local foodstore capable of meeting needs of new residents. There is no need to release this small site when so many houses are being built at Kingsway and Hunts Grove.
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Land at Clearwater Drive is a greenfield site. To allocate this site for residential is contrary to PPG3, Draft PPS3, the emerging SWRSS and the draft Core Strategy at Strategic Objective 4 and Core Policy 3, as there are suitable brownfield sites available which are sequentially preferable to the allocation of a greenfield site for residential development.</p> <p>The Gospel Hall at Sneedhams Green should be allocated as a brownfield housing allocation.</p>
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.22 – Land at Clearwater Drive	<p>Nature conservation interests need to be protected at this site and the requirement to provide open space will restrict the layout and the ability to make best use of the site.</p> <p>This is a greenfield site.</p> <p>Sites which are not physically constrained should be considered in order to ensure that adequate</p>

			housing can be delivered. The Gospel Hall site has no known physical constraints.
<b>1536</b> <b>Mr Mike Brown</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Object to the development of houses on this land. There are already enough houses and not enough public open space.  Maybe the land could be used for a local shop as there is currently no provision to get a pint of milk or a newspaper?  The site is has also been subject to flooding during the autumn and winter months.
<b>1538</b> <b>Mr D Sharpe</b>	Object	Policy SAD.22 – Land at Clearwater Drive	Object to the development of this land - it is currently a valuable recreational facility.
<b><u>Policy SAD.23 – Mayo’s Land</u></b>			
<b><u>Paragraphs 4.56 – 4.68</u></b>			
<b>0014</b> <b>Persimmon Homes Plc</b>	Object	Policy SAD.23 – Mayo’s Land	Support allocation of site for housing in principle. Suitability of the site has already been accepted by the Inspector's Report into the Stroud Local Plan. Object to the proposed phasing of development. The relatively small scale of the Mayo’s Land site means that holding back the site will have no effect on the delivery of brownfield sites. The site is well located for employment and represents a sustainable development opportunity. The site also offers the potential for family housing.  Policy should emphasise the 'planning' of the site on a comprehensive basis and should not require the site to be 'developed' comprehensively with land to the south.  The site should not be held back. There is no guarantee other sites will come forward e.g. Rugby Club. It is unlikely that existing commitments will meet housing requirements in the period to 2013. Delete phasing element from Policy SAD23.
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.23 – Mayo’s Land	The overall approach is supported however this site has building or planning constraints that make their delivery within the plan period questionable. It is almost inevitable that the delivery of this site will fall beyond that anticipated timeframe. We request that this timeframe is regularly reviewed and updated.  Failure to deliver this site, and others (see other comments) could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.

			We would like to withhold further comments on this site.
<b>1146</b> <b>Highways Agency</b>	Object	Policy SAD.23 – Mayo's Land	<p>Whilst we recognise the need for the LDF to identify additional sites within the administrative area we do not consider that this site offers the most sustainable option for development. We reserve the right to comment further on this allocation at a later stage as we consider that further supporting information is required with regard to a possible solution for increasing capacity at J12 of the M5.</p> <p>We note that the immediate area surrounding this site has secured a significant amount of employment and residential development, which the Agency considers could have an adverse impact on J12. We therefore reserve the opportunity to comment on both this particular allocation and any further proposals to the south of Gloucester until an appropriate solution has been agreed with regard to M5 J12 and the funding secured from developers.</p>
<b>1438</b> <b>Mr &amp; Mrs C Ditchfield</b>	Object	Policy SAD.23 – Mayo's Land	<p>Once again we wish to object to the development of this site for residential use post 2013. The area does not have the facilities, shops, dentists, doctors, schools, leisure etc to support more housing and people in the area.</p> <p>The roads are not adequate for the increasing volumes of traffic, we already have a very high noise level from traffic on both the bypass and Bristol Road (our property is situated between these two roads). Congestion, noise, pollution levels will all increase with additional housing.</p> <p>We have already had more housing built off Bristol Road and the other side of the A38 Bypass on the old RAF site, why do we need more?!!! Quedgeley is quickly becoming a concrete jungle with no green areas for children's play, dog walking or open green space to enjoy.</p> <p>If this application goes ahead are the preservation orders on the trees bordering our property &amp; the development area going to be maintained and adhered to?</p> <p>Will the Meerbrook be protected?</p> <p>Where will the access be from the development, onto the A38 dual carriageway at the roundabout or will we have more traffic piling onto the Bristol Road?</p>
<b>1452</b> <b>Sylvanus Lyson's Charity</b>	Object	Policy SAD.23 – Mayo's Land	Mayo's land - SAD23. It is considered that the allocation of this site in the Gloucester LDF is premature pending the consideration of adjoining land in Stroud District. In view of its allocation for housing post 2013, it is considered that its status should be reviewed in the light of proposals put forward in the Stroud LDF. This site is also the furthest from the City Centre, and whilst having several locational advantages, does not perform as well as Hempsted in sustainability terms.
<b>1439</b>	Object	Policy SAD.23	I believe the land should not be developed for the following reasons:

<p><b>Mr David Radcliffe-Watts</b></p>		<p>– Mayo's Land</p>	<p>Highways - Bristol Road cannot cope the current level of traffic let alone the volume this will increase to once the Kingsway and Hardwick developments have been completed. An additional 2,800 and 1,700 houses respectively. The traffic backs up currently from the Naas Lane roundabout to Elmgrove Road East during peak times.</p> <p>The proposed access for Mayo's land I understand to be where the gate is currently into the field. This will cause untold congestion with the access to Meerbrook Way and is potentially dangerous. We currently have problems accessing the Bristol Road from Meerbrook Way when traffic is parked along the Bristol Road as it is. Having two junctions so close together will cause untold problems. The road infrastructure locally will break down.</p> <p>Health &amp; Safety - with increased traffic comes an increased risk to both pedestrians and motorists and I foresee a fatal accident if the land is developed. Increased traffic causes additional pollution which will detrimental to the local environment.</p> <p>Environmental - this is the last substantial green area in this part of Hardwick/Quedgeley and it would be a disgrace to loose this. The proposed development is along an ancient brook and will impact on the wildlife in the area. The area is in a flood plan with the land being very wet which makes it unsuitable for housing.</p> <p>I believe that Gloucester City Council should make a stand and not develop this land. It should not be bullied by Stroud Council to develop this land. It is on the fringes of Stroud's authority and as such the development would not impact on it's residents but on Gloucester's.</p>
<p><b>1504</b> <b>Bellway Homes Wales</b></p>	<p>Object</p>	<p>Policy SAD.23 – Mayo's Land</p>	<p>Mayo's Land is a greenfield site. To allocate this site for residential is contrary to PPG3, Draft PPS3, the emerging SWRSS and the draft Core Strategy at Strategic Objective 4 and Core Policy 3, as there are suitable brownfield sites available which are sequentially preferable to the allocation of a greenfield site for residential development.</p> <p>The Gospel Hall at Sneedhams Green should be allocated as a brownfield housing allocation.</p>
<p><b>1504</b> <b>Bellway Homes Wales</b></p>	<p>Object</p>	<p>Policy SAD.23 – Mayo's Land</p>	<p>This site requires a flood risk assessment and will need a comprehensive scheme including the adjacent site which is in a different local authority.</p> <p>This is a greenfield site.</p> <p>Sites which are not physically constrained should be considered in order to ensure that adequate housing can be delivered. The Gospel Hall site has no known physical constraints.</p>

**Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane**

**Paragraphs 4.69 – 4.80**

<p><b>0171</b> <b>Bovis Homes Limited</b></p>	<p>Support</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>The overall approach is supported however this site has building or planning constraints that make their delivery within the plan period questionable. It is almost inevitable that the delivery of this site will fall beyond that anticipated timeframe. We request that this timeframe is regularly reviewed and updated.</p> <p>Failure to deliver this site, and others (see other comments) could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comments on this site.</p>
<p><b>0184</b> <b>Hempsted Residents Association</b></p>	<p>Support</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>The constraint of 30 dwellings and recognition of the traffic issue at the Secunda Way/Monkmeadow Junction is welcomed and strongly supported.</p>
<p><b>0445</b> <b>Environment Agency</b></p>	<p>Comment</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>Given the previous use, site specific obligations should include an assessment of contamination.</p>
<p><b>1063</b> <b>Joseph Rice</b></p>	<p>Comment</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>We wish to advise the following for your consideration in the residential development of the site:</p> <ol style="list-style-type: none"> <li>1. The Ordnance Survey map is out of date and does not correctly show the present boundary of 26 Hempsted Lane. We enclose a corrected copy of the map with the change of boundary with our neighbour.</li> <li>2. The northern section of the site has flooded in the past.</li> <li>3. Any future residents should be aware that our company operate HGV's on site, working 24 hours and operating forklifts and machinery during these hours.</li> </ol> <p>We are available to discuss these issues if required.</p>

<p><b>1442</b></p> <p><b>Cavanna Homes (South West) Limited</b></p>	<p>Object</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>Object to the allocation of this site for housing. Employment use should be retained on site. Land to the north east of the site encompasses industrial warehousing and commercial uses and the extensive size of the oil storage depot site gives potential to reactivating the employment use of the area. In addition, the accessibility of the site to nearby residential areas can generate local job opportunities.</p> <p>In addition to concerns regarding the defensibility of the boundaries of the site, there are issues relating to ground conditions, and flooding under extreme conditions. The historic use of the site is likely to raise a number of contamination issues which could make redevelopment for both market and affordable housing unviable.</p>
<p><b>1443</b></p> <p><b>Brasenose College</b></p>	<p>Object</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>Objection is raised to the allocation land at the former oil storage depot on Hempsted Lane for residential development. This site has been identified in previous Local Plans for residential development, but to date no schemes have come forward for discussion. This is no doubt related to the site's significant issues relating to contamination, flood risk, and the extensive site-specific improvements (provision of footpath, contribution to floodplain defences, restoration/landscape improvements to storage tank area, retention of former air raid shelter and contribution to new roundabout).</p> <p>The extensive works involved in progressing the site result in it being an unviable site for residential redevelopment at present - this is reflected by the lack of schemes coming forward over the last 6 years. The site should therefore not be included as a preferred option as it does not meet the 'developable' requirement cited by the emerging PPS3.</p>
<p><b>1452</b></p> <p><b>Sylvanus Lyson's Charity</b></p>	<p>Object</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>The former Oil Storage Depot - SAD 24. This site has limited potential for housing and is likely to require remediation associated with its previous use. This has not been fully investigated and the cost of remediation is not yet established. This could affect the viability of the site for housing development and have an adverse effect on the ability to provide affordable housing. The site is considered to be "relatively accessible to a range of shops and services" and is in close proximity to the Charity's land at Hempsted Lane. However, one of the reasons given for the Charity's land not being allocated (page 50 of the Preferred Options Document) is because it has limited access to local facilities and is poorly served by public transport. The Sustainability Appraisal of the Objection Housing Sites indicates that the Hempsted Land site is only 0.2km from the nearest Post Office, 0.3km from the primary school and only 2 km from the city centre.</p>
<p><b>1503</b></p> <p><b>Taylor Woodrow Development</b></p>	<p>Object</p>	<p>Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane</p>	<p>Object to the allocation. The site has been previously allocated but no schemes have come forward. This is no doubt related to issues of contamination, flood risk and the required site improvements set out in the policy. It is unviable for residential development at present. The site should not be included as it does not meet the 'developable' requirement set out in PPS3 nor does it meet the tests of soundness set out in PPS12.</p>

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<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane	<p>The Former Oil Storage Depot has several site specific obligations which in reality are likely to act as constraints resulting in the site being commercially unviable.</p> <p>The location of the site in close proximity to the Council's refuse disposal tip also limits its residential potential.</p> <p>The site should be omitted and replaced with the Gospel Hall site which has no known physical constraints.</p>
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.24 – Former Oil Storage Depot, Hempsted Lane	<p>This site will require a contribution to floodplain defences and compensation measures and the restoration of the site/landscape improvements of the storage tank area.</p> <p>Retention of the former air raid shelter is required plus off site highway works.</p> <p>This is a green field site.</p> <p>Sites which are not physically constrained should be considered in order to ensure that adequate housing can be delivered. The Gospel Hall site has no known physical constraints.</p>
<b><u>Policy SAD.25 – Land at Leven Close and Paygrove Lane</u></b>			
<b><u>Paragraphs 4.81 – 4.87</u></b>			
<b>1451</b> <b>Mr Garry D Carpenter</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	<p>I believe that any development of the land to rear of Leven Close will be detrimental to the local environment unless STRICT controls and RETENTION OF TREES &amp; HEDGES is part of the planned development.</p> <p>Whilst the plan shows only a thin drawn line on the boundary in REAL LIFE you will see that this area is one of the few remaining areas in Longlevens with trees &amp; hedges that support wildlife. The area is a literal oasis in an ever increasing sterile landscape and currently is home to wildlife of all types including Great Crested Newts which are a protected species.</p> <p>The boundary of the current open space and particularly the boundary of the garden of 32A / 32B Church Road which now appears to be included in this plan is heavily populated with trees of many species and if destroyed will be detrimental to all of our environment.</p> <p>I attach two photographs taken from my garden with a view across the current garden 32A/32B</p>

			<p>Church Road and the current open space. You will see the amount of trees and hedging that face destruction unless this scheme will preserve them.</p> <p>Unfortunately it seems that the local council has an antiseptic view of 'nature' and this is illustrated in the recent article taken from the 'Citizen' about more inadvertent vandalism by the council ! A copy of this article is attached.</p> <p>Surely this scheme can incorporate much of the existing hedgerows &amp; trees and if it cannot then I will continue objections to this plan.</p> <p>Photos and article provided.</p>
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.25 – Land at Leven Close and Paygrove Lane	<p>This policy is supported however we request that the capacity of the land at Leven Close is increased to 30 - 50 dwellings. This would make more efficient use of the land and would assist the local authority in achieving the RSS housing requirement.</p> <p>By increasing the density the remainder of the site can still be maintained as public open space. An increased density could assist through a S106 agreement in improving the quality of the public open space with the potential for a greater financial contribution to Paygrove Lane Neighbourhood Park.</p> <p>We request that the number of dwellings is increased to 30 - 50, depending on density.</p>
<b>1382</b> <b>Mrs U M Neary</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	<p>Whilst not happy with the loss of a Greenfield site, a low density housing scheme as proposed is better than losing the whole field to houses.</p> <p>Currently all houses in Richmond Gardens have fences backing onto the field and it would be preferable, from a security point of view, if the rear gardens of the proposed houses back onto those in Richmond Gardens with the access road towards the middle of the field.</p>
<b>1403</b> <b>Mr Martin Pepper</b>	Support	Policy SAD.25 – Land at Leven Close and Paygrove Lane	<p>No objections to the development of a neighbourhood park.</p>
<b>1450</b> <b>Gloucestershire County Council</b>	Support	Policy SAD.25 – Land at Leven Close and Paygrove Lane	<p>Support. This proposal would provide a substantial permanent area of new public open space currently not available to the community. Adequate resources must be available through the development process to layout the new recreation and public open space areas. There is no justification for defining a precise number of dwellings.</p> <p>Delete reference to "up to 15 dwellings" in Para 4.85 and Policy SAD25.</p>

<b>1465</b> <b>Mrs Freda O'Donnell</b>	Support	Policy SAD.25 – Land at Leven Close and Paygrove Lane	The plan includes a portion of land that I own. I am in favour of it being included in any development during the future.  Please keep us informed.
<b>1402</b> <b>Mr John Entwistle</b>	Support	Policy SAD.25 – Land at Leven Close and Paygrove Lane	I was unable to find details of the plans to create a public park on the land adjacent to Longlevens Primary School, however I have the general comments which I believe should be considered and answered. 1. A bridge over Horsebere Brook should be provided which will enable residents from the Greyhound Estate to gain access to this facility. 2. Will the park be open 24 hours a day or will it be closed during the hours of darkness? 3. What measures will be made to safeguard the privacy and security of the residents of College Fields which adjoin the proposed new park? 4. What amenities will be available in the park?
<b>1434</b> <b>Rajkamal Choudhury &amp; Rubina Alvi</b>	Comment	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Thank you for writing to us for our opinion on the development of the land near Paygrove Land and Leven Close. We welcome the proposition to develop the land near Paygrove Lane (beside the Longlevens Infant School) as a Park. However, we are not happy about building new properties in the land off Leven Close because there are not many green spaces left in Longlevens. I am sure my neighbours would share the same views.
<b>1469</b> <b>Mrs L Ewers</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Concerns regarding the loss of view and extra traffic generated.  Please explain where the access would be from?
<b>1472</b> <b>Mr David Mason</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	We wish to object in the strongest terms to any further residential development in this locality. We feel that Longlevens has already been overdeveloped and that local services already struggle to cope with the existing volume of traffic and residents.  A few years ago the safety of the children at the Junior School in Church Road was top of the agenda, leading to the imposition of parking restrictions i.e. double yellow lines in our road, The Avenue. We were therefore surprised that it was subsequently considered appropriate to allow the building of more houses, following the building of the new library , very near to the school itself.  That new development itself will bring more congestion to the very area that was a few years ago the subject of such concern about child safety. Similarly, the potential development will bring more congestion to the vicinity of the infants school in Paygrove Lane, again putting children's safety at risk.

			<p>On the subject of congestion and parking restrictions, we have lived in The Avenue for over 16 years and in all that time neither of us have ever seen a traffic warden patrolling the area. Examples of the problems that already arise around the area include drivers parking on the double yellow lines at the top of our road around 3.00pm weekdays, and drivers parking on the bend of Windermere Road, between the Co-Op store and Lloyds Chemist, again on double yellow lines, at all times of the day. More houses will bring more people, more cars, and only adding to these problems.</p> <p>Mrs Mason has lived in Longlevens for over 40 years, has seen the area change beyond recognition and feels saddened that one of the last remaining green spaces in Longlevens seems set to disappear forever.</p> <p>We would like to ask if the Council can confirm that it has purchased the narrow strip of land commonly referred to as 'the paddock', that runs along the backs of a number of gardens in The Avenue. We would also like to ask what use is proposed for that strip of land. We are concerned about this for two reasons. Firstly, its proximity to the bottom of our own garden. Secondly, we have a very large crack willow tree situated at the very end of our garden, which overhangs that strip of land. In the 16 years we have lived here we have paid for our tree to be pollarded three times and the tree surgeon has previously gained access to do the job from the property belonging to the owner of that strip of land.</p> <p>We have recently arranged for our tree to be pollarded again and the qualified tree surgeon has informed us following his own extensive research of willow trees, that our tree is at the very least, 400 years old - possibly 500 or six hundred years old. He said it is one of the oldest, if not the oldest, tree in Longlevens.</p> <p>We are obviously very concerned that building contractors could hack at the tree and damage it when clearing the site etc. We feel that the preservation of our tree is of paramount importance. We also oppose the destruction of the other existing trees on the site.</p> <p>Leading on from this, the potential development includes residential housing and public open space. Where would the housing be located and how will the effect on existing residents be managed, so that the enjoyment of their properties is not reduced?</p>
<p><b>1479</b> <b>D A &amp; E J</b> <b>Grimwood</b></p>	<p>Comment</p>	<p>Policy SAD.25 – Land at Leven Close and Paygrove Lane</p>	<p>1. The area designated on your map as a Neighbourhood Park has the potential of being developed into a space which benefits the Longlevens community, but only if it were properly controlled and not just left as open space which would be abused by the youth element. It may be necessary to secure the site by lock and key, and only used for organised activities. No doubt a number of activities have already been considered.</p>

			<p>2. In the writers opinion the first step to use if the this area is to provide a car parking area behind the existing fence between the existing fences of the Tiny Tots playgroup and the newly built houses. The parking area should run parallel with the road and be of sufficient width to accommodate cars for the 'park' area and also be used for parking for the normal infants school traffic.</p> <p>3. By this means Paygrove Lane could be made a no-parking road from the school entrance to at least the junction into College Fields, this would make the road a good deal safer particularly at school times and generally through the day where buses and large vehicles often have problems. It would also make life tolerable for the residents in getting in and out of their own driveways.</p> <p>4. Note, that in providing this car parking area that all existing fences, hedges, lamp standard, telegraph poles and the pathway can remain unchanged. A gateway would be necessary near to the existing fence of the newly built houses. A rough sketch has been provided of this proposal.</p> <p>The land area adjacent to Leven Close is identified for limited residential development - one wonders what 'limited' means. Whatever housing is added to this already densely populated areawill only contribute further to the problems of traffic on Paygrove Lane and sensible access should be from Leven Close. Again the area of public open space requires some sort of control from a security point</p>
<p><b>1375</b></p> <p><b>Mr A I Fleming</b></p>	Support	<p>Policy SAD.25 – Land at Leven Close and Paygrove Lane</p>	<p>Preferred choice;</p> <p>Remains as open space to be used for structured sports, for example junior football and cricket. All facilities to be kept at a reasonable distance from residential areas to minimise noise and disturbance. Ideally the area would be supervised to prevent anti-social behaviour.</p> <p>Concerns:</p> <p>Anti-social behaviour as seen at Greyhound Gardens. Is there a plan to deal with this_</p> <p>Would like too see a natural barrier such as a hedge to protect personal garden fence and to protect access to the rear of garden.</p>
<p><b>1379</b></p> <p><b>S W Dix</b></p>	Object	<p>Policy SAD.25 – Land at Leven Close and Paygrove Lane</p>	<p>Object to the Neighbourhood Park - this would cause more traffic in the area and cause more problems for local people to access their properties.</p>
<p><b>1379</b></p> <p><b>S W Dix</b></p>	Support	<p>Policy SAD.25 – Land at Leven Close and Paygrove</p>	<p>Paragraph 4.85 - Support the proposal for 15 dwellings at the rear of Leven Close (preferring them to be bungalows). The access should be from Leven Close, and the present gateway onto Paygrove Lane closed.</p>

<p><b>1390</b></p> <p><b>Kevin Jacobs and Jane Barr</b></p>	<p>Comment</p>	<p>Lane</p> <p>Policy SAD.25 – Land at Leven Close and Paygrove Lane</p>	<p>Firstly we have visited the web site and local library and have found that the information is not sufficient to be specific in terms of detailed concerns at location of buildings/dwellings. We also can see no mention of maintaining trees and boundaries associated with the land in question.</p> <p>With this in mind we must restrict our concerns to matters assumed by us given the paucity of information at this time.</p> <p>We would like to offer comments as follows;</p> <ol style="list-style-type: none"> <li>1. We are concerned that trees at the bottom of our Garden would be destroyed. This would remove a natural habitat for local wildlife and natural screen between us and the neighbouring property.</li> <li>2. We are concerned that the position we currently enjoy regarding privacy in our garden will be severely and significantly reduced by the councils proposals should they go ahead.</li> <li>3. We are not clear and therefore concerned at how access to the site would be made.</li> <li>4. At present we are aware that the local services (drains etc) are under pressure. Would this development not add to this burden?</li> </ol> <p>Given our concerns we would seek assurance that, should this development proceed, the boundary between our garden and the proposed development be the responsibility of the developer, and subsequent land owners, for maintenance.</p> <p>That the boundary fencing be robust and at least six feet high, and the trees at the bottom of our garden be retained.</p> <p>We conclude by noting the many controversial years that, in spite of local residents seeking to appreciate the land being put to good use, the council has chosen to allow the land to be effectively 'out of bounds' only appreciating (no doubt) in a fiscal way.</p> <p>Would it not be better for the council to exercise its ecological and social responsibilities by converting the land to allotments? Surely this step would minimise the already extensive burden on local infrastructure (drains, roads etc.) and meet the demand of a growing socially acceptable use?</p>
<p><b>1419</b></p> <p><b>Laura Homer</b></p>	<p>Object</p>	<p>Policy SAD.25 – Land at Leven Close and Paygrove Lane</p>	<p>Firstly before making a final comment on the development of the Land at the rear of Leven Close I would like to know exactly what limited residential development means. What will the housing consist of? Will it be starter homes, housing association, or luxury detached properties. At present the aspect to the rear of my property is of a green field so I do not relish the prospect of any form of building development.</p>

			<p>Secondly, I am informed that the detached house immediately adjacent to the gated access to the field in Paygrove Lane (29 Paygrove Lane) is subject to a compulsory purchase clause should planning permission be granted. I take it that this house will then be demolished in order to facilitate access to the field. This is all very well, but I have purchased my house with this property being next door to me and not a road, so I would have very strong objections. Can you confirm as to whether this purchase clause is correct?</p> <p>In relation to the development of Paygrove Lane, why do we need another park? There is a very large park area in Greyhound Gardens, which includes a children's play area. There is also another park and play area already in Paygrove Lane, which is near to the footbridge leading into Innsworth.</p> <p>What about the children at the primary school. Are they to lose their playing field?</p> <p>We do not need another park. All parks look very nice in the daytime, but all you will attract during the evening times is a nice pretty refuge for under age drinking and anti social behaviour, that residents living nearby will be subjected to. This in itself will then put pressure on the Police and local authority to sort it out. As with other parks/play areas within the county there will then be an uphill struggle to sort this problem out.</p> <p>I would strongly object to this development.</p>
<b>1428</b>	Comment	Neighbourhood Park, Paygrove Lane	<p>My property backs onto the area of land adjacent to Longlevens Infants' School. One of the attractions of the property when we purchased it in 1998 was that it did back onto open land with views over to the Chosen Hill and the Cotswold Escarpment so I do have a deep interest in any proposals for the future use of the land.</p> <p>The problem that I have is that I have no idea what a 'Neighbourhood Park' will consist of. For this reason I find it difficult to offer a view and before I do I would need to have the following questions answered:</p> <ul style="list-style-type: none"> <li>• What exactly is the concept of a 'Neighbourhood Park'?</li> <li>• From where will the park be accessed?</li> <li>• Will any new access points be established? E.g. will any new access over the stream from Greyhound Gardens be created?</li> <li>• Will it be landscaped or simply an open area?</li> <li>• Will it have a play area with play equipment and where would this be sited?</li> <li>• Will there be an area for playing ball games and where would this be sited?</li> </ul>

			<ul style="list-style-type: none"> <li>• Will the park be patrolled to ensure that it is not abused/misused?</li> <li>• Can any guarantees be offered that the problems that exist with gatherings of young people etc (as happens in other parts of Longlevens) will not occur?</li> <li>• Will it have opening and closing hours?</li> <li>• Will any arrangements to screen the park from properties in College Fields be made? Eg will there be any new tree planting along that boundary?</li> </ul> <p>I appreciate that the City Council may only be thinking conceptually at this time but I cannot see how you can expect people to comment upon these proposals until they know exactly what they entail. For this reason we would take the position that no changes should be made to the use of the land unless and until fully detailed proposals are published and agreed with the residents of the area who will be most affected by the changes.</p>
<b>1431</b> <b>Diana Docksey</b>	Comment	Policy SAD.25 – Land at Leven Close and Paygrove Lane	<p>The proposed development will be a foregone conclusion but I hope that the inevitable extra traffic which will result from the development is already a matter receiving a great deal of consideration. At peak times Paygrove Lane is a nightmare to negotiate, the school run both in the morning and afternoon affects a virtual one way zone with traffic queuing both ways. Into this already chaotic mix then add the No.6 bus, which also stops just at the entrance to the field.</p> <p>Once at the top of Paygrove Lane there is a mini roundabout taking a right into Leven Close. If the proposed housing is sited off Leven Close which seems to be the area where they will blend in with existing housing and cause less visual impact, the resulting extra traffic will then cause even more congestion at the school crossing and mini roundabout, both within yards of each other and presumably into Paygrove Lane as there will no doubt be families with young children of school age.</p> <p>I would like to see the public open space suitably lit with any areas backing onto residential gardens secure to stop any potential intrusion, i.e. trespassing or invasion of privacy. If there is to be a public park, will there be regulated opening and closing times, as there is already an issue with youngsters causing problems (there have been instances of fires being started, under-age drinking, etc.)?</p>
<b>1432</b> <b>Sue &amp; Mike Griggs</b>	Support	Policy SAD.25 – Land at Leven Close and Paygrove Lane	<p>We are very much in favour of the Neighbourhood Park plans for Paygrove Lane - as our house is at the back of this Park then obviously we would prefer that to housing. We would like to know what access plans there are? We would suggest that pedestrian/bicycle access is made available from the Greyhound Gardens estate, via little bridges over the brook to allow children (and parents) easy access to the playing fields. Without this access people will have to walk along Cheltenham Road or might be tempted to drive around and park, causing further chaos in Paygrove Lane - already bad enough during school entry and exit times.</p>

			<p>We would also hope that particular care will be taken to ensure the areas do not become new 'homing grounds' for the local drug addicts/pushers. They appear to have been moved on from the Greyhound/Co-op parking area so it would be nice to keep the area a safe environment for the young children.</p> <p>Is it planned to use this park for local youth football/cricket/rugby teams? Our children and well grown but there's nothing better than to hear the sound of children playing healthy, organised games with full parental support.</p>
<b>1495</b> <b>Mr Mark Thomas Leach</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Current parking problem in Leven Close, Church Road and Paygrove Lane. The proposals will exacerbate these problems and are not acceptable.
<b>1496</b> <b>Mrs A C Hitchcock</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Object. The site is needed for open space. Part of the site is used by the Infant School. Local schools will struggle to accommodate additional housing. Concern expressed over narrow access to Leven Close. Proposals will add to traffic congestion on Church Road.
<b>1561</b> <b>Mr &amp; Mrs J W Rigby</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Would prefer to see houses built as young people already congregate at the rear of my property. Police and Councillors are not concerned about damage that has already been done and what happens when it's dark.
<b>1563</b> <b>Mr &amp; Mrs Huggins</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Support principle of Neighbourhood Park provided it does not encourage gathering of youths, vandalism and noise. We are sure a football/cricket club would be happy to pay a fee to keep the field as it is. We need greenery to look at rather than more housing. Leven Close land should be left as open space. No more housing please.
<b>1579</b> <b>Mrs J Gribble</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Object to more houses being built in Longlevens owing to the level of traffic and existing congestion in the area.
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove	Land at Leven Close is a greenfield site. To allocate this site for residential is contrary to PPG3, Draft PPS3, the emerging SWRSS and the draft Core Strategy at Strategic Objective 4 and Core Policy 3, as there are suitable brownfield sites available which are sequentially preferable to the allocation of a greenfield site for residential development.

		Lane	The Gospel Hall at Sneedhams Green should be allocated as a brownfield housing allocation.
<b>1514</b> <b>Anna M Blakeway</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Object to proposed development. The land was acquired for school use originally. Concerned about potential volume of traffic on Paygrove Lane particularly with so many school children walking in the area. Why cannot the children already in the area have an area in which to play organised sport?  The drainage and sewage system in the area already has extreme difficulty in coping during severe downpours and this has become worse since the development of College Fields and Greyhound Gardens. More houses will only exacerbate the problem.
<b>1522</b> <b>Mrs Amanda Jones</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Object to loss of access by Longlevens Infants School to the open space immediately adjacent to it which is proposed to become a neighbourhood park. The open space is used by the school for recreational and environmental purposes as well as for events with the community including fetes and sports days.  The field is also used by a community football coaching team.
<b>1539</b> <b>Mr N P Belchamber</b>	Comment	Policy SAD.25 – Land at Leven Close and Paygrove Lane	I quote from Mr J M Dorer, Development Valuer at Gloucestershire County Council; 'If however future use of the land as suggested eventually becomes a formal policy then vehicular access off Leven Close would clearly be an option.  As this is the consultation stage I would ask you to ensure that it is noted that the land between the public highway of Leven Close and the land in question is the private property of the owners of houses 19, 20, 21 and 22 Leven Close, and I am given to believe that part is also owned by Bovis Homes.
<b>1542</b> <b>Miss Nicola Ravenhill</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Object to use of land at Paygrove Lane as a neighbourhood park owing to problems in the area with existing local parks being used for drug taking and other associated anti social behaviour, by youths.  A neighbourhood park would also result in additional parking on Paygrove Lane. The objector already experiences problems leaving their house during school drop off and pick up times owing to parents parking across their drive, or suffer from reduced visibility if parents parking obscures visibility from their access drive.  Objector would prefer to see a limited development of dwellings on the site with an open space that the school can continue to use rather than a neighbourhood park.
<b>1544</b> <b>Paula Mallinson</b>	Object	Policy SAD.25 – Land at Leven Close and Paygrove Lane	Proposal would result in loss of trees adjoining objectors rear boundary resulting in a loss of personal security. Objector's property would become overlooked by new houses and the proposed public open space would become a congregating area for drinking youths.

**Policy SAD.26 – Land at Hammond Way**

**Paragraphs 4.88 – 4.93**

<p><b>0171</b> <b>Bovis Homes Limited</b></p>	<p>Support</p>	<p>Policy SAD.26 – Land at Hammond Way</p>	<p>The overall approach is supported however this site has building or planning constraints that make their delivery within the plan period questionable. It is almost inevitable that the delivery of this site will fall beyond that anticipated timeframe. We request that this timeframe is regularly reviewed and updated.</p> <p>Failure to deliver this site, and others (see other comments) could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comments on this site.</p>
<p><b>1442</b> <b>Cavanna Homes (South West) Limited</b></p>	<p>Object</p>	<p>Paragraph 4.93</p>	<p>Object to land at Hill Farm not being taken forward as a draft housing allocation. The site provides the opportunity to provide a mix of house types to compliment the high number of one or two bedroom flats that will come forward in the Central Area. Sites outside the City Centre should be allocated in sustainable locations for family sized accommodation. The site has capacity for 300 dwellings.</p> <p>Although a proportion of the site is in the floodplain, this area could be planted to form an attractive soft border. The site has no ecological designation and does not perform an important habitat function. It would represent logical infill between the existing built up area of Hempsted and the Netheridge works.</p> <p>The site is within the Cordon Sanitaire although this should be reduced in size to 400m for reasons set out in more detail in our objections to the Cordon Sanitaire policy.</p> <p>The site has good links to local services, employment opportunities and has excellent links with the City and surrounding areas. The nearest post office is 400m away and there are schools within close proximity of the site.</p> <p>The completion of the bypass will reduce traffic on Bristol Road and allow improvements to be made to bus, cycling and pedestrian facilities which will increase the sustainability of development at Hempsted. Improvements to public transport could be funded through development of this site.</p> <p>The site adjoins the BT depot which is allocated for employment use and performs well in</p>

			sustainability terms (Council's own assessment). The assessment is just as relevant to Hill Farm. It would also be beneficial to have housing adjacent to an employment site.  The site should be included in the LDF.
<b>1504</b> <b>Bellway Homes Wales</b>	Object	Policy SAD.26 – Land at Hammond Way	This site has to consider the impact of existing adjacent commercial development.  Sites which are not physically constrained should be considered in order to ensure that adequate housing can be delivered. The Gospel Hall site has no known physical constraints.
<b><u>Issues and Options Sites not being taken forward</u></b>			
<b><u>Paragraphs 4.94 – 4.113</u></b>			
<b>1442</b> <b>Cavanna Homes (South West) Limited</b>	Support	Paragraph 4.94	Support the decision not to take the following four sites forward as allocations: Land at Sandhurst Lane, Land South of Grange Road, Star 66. Moreland's Trading Estate.
<b>1499</b> <b>Hallam Land Management</b>	Object	Paragraph 4.101	Object to the non-inclusion of land south of Grange Road as a housing allocation. The Council considers that there are only two reasons for not allocating the site. The first is that the site is not needed to meet the City's housing requirement. The second is that it is within the draft greenbelt boundary. In terms of housing need, the Council should not rely on the draft housing figures set out in the RSS. There is a strong case for additional housing to be provided and other identified sites are not likely to deliver the scale of housing required. There is not sufficient land to meet the City's housing requirement. Based on past delivery rates, the annual delivery of 575 dwellings will require a step change in the level of housing development. The redevelopment of previously developed land will become harder to achieve over the duration of the plan period. The identification of an additional greenfield site on the edge of Gloucester would not prejudice the regeneration of the Central Area of Gloucester. There is a recognized shortfall and need for larger dwellings and much housing in the Central Area will be smaller units. Greenfield sites offer the potential to provide a mix of house types and the potential to provide a greater proportion of affordable housing. In terms of greenbelt, the method and background to the identification of a greenbelt extension in this location is flawed. It follows for example from the previous 1998 strategic gap which was rejected as being unnecessary.  Whilst land south of Grange Road is greenfield it has no particular landscape or nature conservation

			<p>value. It represents a highly appropriate and sustainable location for future development acting as a natural extension to the urban area. There are many local services and facilities within close distance of the site plus employment opportunities at Waterwells and Quedgeley. There are no technical reasons which render the site inappropriate for development. The area is flat, has below average landscape quality and is heavily influenced by urban activity. The development of 225 dwellings would have no material impact on the highway network. Any biodiversity interest could be retained and potentially enhanced through development. There are no archaeological constraints. The site is not in a floodplain.</p> <p>The site is an ideal location for a future urban extension to the City.</p>
<p><b>1450</b></p> <p><b>Gloucestershire County Council</b></p>	Support	<p>Paragraphs 4.119 – 4.125</p>	<p>This site is a direct parallel with the Clearwater Drive site, see Policy SAD22. The land is used on a permissive basis only which may be withdrawn at any time. Indications are that the site will not be required for education purposes; similar proposals as for Clearwater Drive are made should the education requirement be not needed. If that is confirmed, the site should be allocated for residential development with significant provision of a new public open space and amenity area. The site offers a substantial opportunity for the provision of residential development with a new area of permanently available public amenity, recreation or open space. To ensure proper sequential use of land, to meet housing requirement numbers and to exploit the opportunities of improving public open space the option should be available for re-use for other purposes if the education requirements are no longer necessary.</p> <p>Maintain original proposal that the site is included as a conditional allocation.</p>
<p><b><u>Objection Sites Not Being Taken Forward</u></b></p> <p><b><u>Paragraphs 4.114 – 4.187</u></b></p>			
<p><b>1450</b></p> <p><b>Gloucestershire County Council</b></p>	Comment	<p>Paragraphs 4.135 – 4.139, Shepherd Road Depot, Cole Avenue</p>	<p>Whilst the County Council recognises the importance of contributing towards the provision of employment land and job opportunities within the city, if there is minimal or no demand for such use the opportunity for redevelopment with a mixed use form should be permitted. Large areas of employment land are already allocated for redevelopment of this form within the Central Area Action Plan and in this specific document e.g. St. Gobain, former Gas Works site, railway triangle etc.</p> <p>Allocate for potential mixed-use site.</p>
<b>1452</b>	Object	Land to the east and west	<p>The Sylvanus Lyson's Charity played a full part in the adopted Local Plan's evolution as part of the Hempsted Land Owners' Consortium. As a result of its involvement, a site at Hempsted was allocated</p>

<b>Sylvanus Lyson's Charity</b>		of Hempsted Lane	<p>for residential development which is now completed. The Charity retains further land in this area and this was brought to the attention of the City Council by letter dated 23 March 2005, prior to the publication of Issues and Options paper. A plan showing the extent of the site is attached (RPS 1).</p> <p>The Charity believes that this land, as previously indicated, is suitable for residential purposes and representations were made at the Issues and Options stage objecting to the designation of the land as a Landscape Conservation Area and Prime Biodiversity Area. Both of these designations are inappropriate, have not been properly justified and adversely affect the development potential of the land.</p>
<b>0184 Hempsted Residents Association</b>	Support	Paragraph 4.116	The association fully supports the decisions to resist allocation of the objection housing sites for development. Such development would be contrary to Council policies relating to Landscape Conservation Areas and in some cases the Cordon Sanitaire.

**Policy SAD.27 – Blackbridge Allotments**

**Paragraphs 4.192 – 4.196**

<b>1404 Mr Nigel Lively</b>	Support	Policy SAD.27 - Blackbridge Allotments	<p>May I confirm that the principal of developing this site is acceptable to me as owner of 214D Stroud Road as I assume the outlook from my first floor flats windows would be protected by the normal planning process, as I had to do with my neighbour when I developed the building. My property is the only one directly affected by your proposal as I see it.</p> <p>How it can be done is another matter as the walkway access point is currently totally unsuitable in my view. To upgrade visibility in order to make a junction at this point safe in my view could directly involve my property in terms of losing land and parking to visibility lines. Perhaps you could ask you highway officer to contact me directly to explain how this is to be done, in line with current national requirements, without requiring land from me.</p> <p>I would also point out that this walkway to the allotments is heavily used by Crypt school children and the access point and road as a major drop off point for them. The allotment walkway junction has poor visibility at present to both sides and a hump back bridge to the top side making enlargement that way of no benefit to sight lines as I see it.</p> <p>Sorry, but now I have at last got a contact point for the owners of the land could it be cleared and</p>
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			maintained as the rest of us have to do as my property is forever getting brambles and rubbish over from the site which has been let go in recent times to emphasise its redundancy, I assume.
<b>1387</b> <b>The Crypt School</b>	Support	Policy SAD.27 - Blackbridge Allotments	<p>The proposed buildings will have little impact on the Crypt School. The site however does adjoin Ash Path which runs alongside its southeast boundary, a popular route to Stroud Road for pupils to and from school. Due to its isolated location between the railway and the allotments, this stretch of path has been the site of a number of incidents of assaults and thefts from pupils by offenders who can wait their unobserved.</p> <p>The development of the site could present the opportunity for increased security along this path. We would request that any proposed layout provides natural surveillance outwards across this boundary. This may need encouragement from yourselves as the normal arrangements in the area if for houses to face away from the railway and to reinforce the boundary fencing on that side.</p> <p>To provide an open aspect and discourage future attacks would be of great benefit to public safety and would improve the quality of life for our pupils.</p>
<b>1558</b> <b>Mr A G O'Neill</b>	Object	Policy SAD.27 - Blackbridge Allotments	Concern about the provision of safe access to the site. Previous development proposals have floundered due to access problems. Also concerned that the proposed community buildings might generate disturbance due to high levels of noise. A sufficient buffer should therefore be provided to minimise any potential disturbance.
<b>1568</b> <b>B G Stokes</b>	Comment	Policy SAD.27 - Blackbridge Allotments	No objection in principle. Any access to Stroud Road would be potentially dangerous given the current volume of traffic. The only possible location would be obscured by the railway bridge. Any car park for the surgery and community buildings should be located at the SW end of the plot to minimise disturbance to local residents.
<b>Policy SAD.28 – Norville Site, Tarrington Road</b>			
<b><u>Paragraph 4.197 – 4.206</u></b>			
<b>0253</b> <b>Ms C Moody &amp; Mr G Fisher</b>	Object	Policy SAD.28 – Norville Site, Tarrington Road	Reiterate earlier comments on this site. Concern over possibility of people accessing rear of property. Concerned about traffic implications of the proposed development. Any new development would need to include sufficient parking for residents. Concern about potential noise implications associated with other business occupants. Flatted development is likely to cause problems of overlooking.
<b>0237</b> <b>Miss T Boucher</b>	Object	Policy SAD.28 – Norville Site, Tarrington Road	Previous views remain unaltered. Deeply concerned about the continued programme of house building in what is already a saturated community. Particular problems include parking and increased traffic.
<b>0445</b>	Support	Policy SAD.28	We are pleased that the supporting text of this policy includes reference to opening the culverted

<b>Environment Agency</b>		– Norville Site, Tarrington Road	watercourse through the site.
<b>1462</b> <b>Mrs P Birt</b>	Comment	Policy SAD.28 – Norville Site, Tarrington Road	Residential development should be subject to two parking spaces per household, due to the already congested parking in the area.  I object to the existing building being used for this due to the fact that it is three stories high and would overlook my property.  If demolishing the factory and building private flats then I might support.
<b>1566</b> <b>Mr Brian Mince</b>	Object	Policy SAD.28 – Norville Site, Tarrington Road	Concern expressed due to problems of parking and speeding. Already problems of cars and delivery vehicles parked in restricted areas making access problematic from some junctions. The area has already reached saturation point and cannot take any more development.
<b>1567</b> <b>Miss L G Branford</b>	Object	Policy SAD.28 – Norville Site, Tarrington Road	Object to any social housing provision on this site. No objection to offices being developed but concerned about the provision of light industrial in a residential area.
<b>1583</b> <b>Barton and Tredworth Community Group</b>	Comment	Policy SAD.28 – Norville Site, Tarrington Road	Small roads in this area mean site has to be developed with care. Support provision of more housing - in keeping with adjoining area. Family housing with parking spaces would be beneficial. Good site for a play area as little currently provided for children in this area. Also good opportunity for public open space. Nearest park not very close or well supervised. Could provide clubhouse for local children/teenagers. Good site for community facilities for families and children. Mixed-use development supported.

#### **Policy SAD.29 – Land at the Junction of Barnwood Road and Bypass**

#### **Paragraphs 4.207 – 4.213**

<b>0580</b> <b>DEFRA</b>	Object	Policy SAD.29 – Land at the Junction of Barnwood Road and Bypass	Support the principle of redevelopment. Concern over content of policy which has moved away from the previous policy set out in the Local Plan. The new policy makes no reference to the need for a landmark building. This should be added to the policy. The supporting text of the policy refers to access being provided from Corinium Avenue with limited access from Barnwood Road. Again a move from the Local Plan policy. Object to the main access being onto Corinium Avenue. Without highway improvements, additional vehicles using the site are likely to exacerbate existing traffic problems in the area (e.g. backing up of traffic). Amend policy to refer to the main access being provided from
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			Barnwood Road. Reference should also be made to the retention of important trees on site. Reference to a pedestrian link through the site from Barnwood Road to Sawmills End should be made under site-specific obligations.
<b>1449</b> <b>Gloucestershire County Council</b>	Object	Policy SAD.29 – Land at the Junction of Barnwood Road and Bypass	We would support the implementation of Policy CA1 'City Centre Boundary', in the Central Area Action Plan, to this site. As an out of centre location office use should only be permitted in 'exceptional circumstances'.
<b>1500</b> <b>Peregrine Gloucester Limited</b>	Object	Policy SAD.29 – Land at the Junction of Barnwood Road and Bypass	<p>The site is subject to a current planning application. The designation of the site under Policy SAD29 is inconsistent with the approach that the Council is taking in respect of the development of this site. In this respect, while we support the tenor of Policy SAD29 it is clear that the boundaries of the area designated under the policy are historic. The area designated under Policy SAD29 should reflect the ongoing discussions with the Council in respect of the detailed proposals for the site.</p> <p>The policy should be amended as follows:</p> <p>Land at the junction of Barnwood Road and Corinium Avenue as shown on the Proposals Map (3.0 hectares) is allocated for mixed-use development of employment, residential, commercial and retail/service uses. Indicative Capacity - 32 dwellings. Site-specific obligations - primary means of access from Corinium Avenue with limited access from Barnwood Road, Travel Plan, Dedication to the City Council of the Playing Field north of Saw Mills End</p>
<b>1565</b> <b>Simon Smith Group</b>	Support	Policy SAD.29 – Land at the Junction of Barnwood Road and Bypass	The redevelopment of the Barnwood Superstop into Budgens has in effect provided the new local shopping centre for this limited site. It makes sense for the rest of the area to be redeveloped with offices and some residential. The sooner permission is granted the better.
<b><u>Policy SAD.30 – Former B&amp;Q Site, Trier Way</u></b>			
<b><u>Paragraphs 4.214 – 4.223</u></b>			
<b>0171</b> <b>Bovis Homes</b>	Support	Policy SAD.30 - Former B&Q, Trier Way	The overall approach is supported however this site has building or planning constraints that make their delivery within the plan period questionable. It is almost inevitable that the delivery of this site will fall beyond that anticipated timeframe. We request that this timeframe is regularly reviewed and

<b>Limited</b>			<p>updated.</p> <p>Failure to deliver this site, and others (see other comments) could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comments on this site.</p>
<b>0202</b> <b>MWA</b> <b>Planning &amp;</b> <b>Development</b> <b>Consultancy</b>	Object	Policy SAD.30 - Former B&Q, Trier Way	<p>Recognition that the site is suitable for continued retail development to bolster Barton Street is welcomed. No justification is provided for limiting the retail floorspace to 1,250 sq.m.</p> <p>The site represents a key development opportunity to enhance both the Local Centre and the City Centre by providing modern retail units in a sustainable location. The draft proposal would provide no incentive for the landowner to redevelop the site. In the absence of a satisfactory scheme, the site would be redeveloped for bulky goods retailing. This would fail to enhance the retail offer and no townscape improvements would be realised.</p> <p>There is more than enough expenditure to support new retail floorspace on this site without harming the City Centre. The Council should reconsider the future of this site and its appropriateness to meet the needs of modern retailers seeking large space units, given the lack of suitable sites in the City Centre. It is also unclear why the site has been excluded from the boundary of the Central Area Action Plan.</p>
<b>1418</b> <b>Gloucester</b> <b>Federation of</b> <b>Small</b> <b>Businesses</b>	Comment	Policy SAD.30 - Former B&Q, Trier Way	<p>We do believe that the old B&amp;Q site should be a large public car park which could service and encourage people to visit the Barton/Eastgate area, provide parking for GL1, the park and gardens and lead to people actually walking down Eastgate street and possibly purchasing products and services from the businesses in the area.</p> <p>Concern was also expressed about the possible closure of Horton Road as a 'rat run', we felt that this could have a detrimental effect on businesses - couriers and general business use, as businesses especially SME may use this as an access point to other parts of the city when they get clogged up with traffic - after all time is money &amp; additional fuel to go around etc all adding an additional burden to companies and therefore would reject any calls to close this or restrict access.</p>
<b>1489</b> <b>Bohdan</b> <b>Jarema</b>	Object	Policy SAD.30 - Former B&Q, Trier Way	<p>Draft proposals supported in principle. Concerned about businesses and activities that go beyond office hours (beyond 6pm) as this site is in a quiet area. Also concerned about any light pollution from the site. Any lights should be directed away from the properties in All Saints Road. Important trees should be retained.</p> <p>Would support the provision of some greenspace on this site to allow people an area in which to relax.</p>

			Believe it would be a good idea to have some form of barrier in operation at the entrance/exit to be closed outside business hours. This would be a good deterrent to trespassers and unauthorised access by cars.
<b>1702</b> <b>Mr John Rednar</b>	Comment	Policy SAD.30 - Former B&Q, Trier Way	Suggest residential scheme with high walls surrounding the area - leave access where it is but install electronically operated double doors. Inside 5 - 10 big detached houses with garages and 4 - 5 bedrooms.  This would help to create a better community in the Barton area.
<b>1583</b> <b>Barton and Tredworth Community Group</b>	Comment	Policy SAD.30 - Former B&Q, Trier Way	Important gateway site. Suggest the name Barton Gate. Junction near the site is dangerous - could some of the site be taken to widen the junction. Do not want heavy vehicles on the site. Potential contamination from methane_ - has affected other sites in the area. Any retail development needs to compliment Barton Street and support local shopping. Potential site for relocation of market. Concerns over more housing due to problems of parking. Possibility of underground/basement parking. Two stories max height of development. If residential, apartments with courtyard might work. If office use would like community office or doctor's surgery. Support for new community building on this site. Not suitable for light industry.
<b><u>Policy SAD.31 – Land East of Waterwells Business Park</u></b>			
<b><u>Paragraphs 4.224 – 4.230</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.31 – Land East of Waterwells Business Park	The principle of this policy is supported.
<b>0239</b> <b>Brookthorpe With Whaddon Parish Council</b>	Object	SAD.31 - Showmen's Guild Site	On behalf of Brookthorpe with Whaddon Parish Council I am contacting you in order to register the Council's opposition to the above proposal.  Naas Lane is a very narrow rural lane that already has enormous pressure from urban traffic using it as part of a "rat run" through to Cheltenham. It is quite unsuitable for the use of traffic associated with the Showmen's Guild. Although I suspect that the "plan" would be for all associated traffic to use Waterwells as a means of gaining access to the major road network, in practice this never happens. This Council is only too aware that large unsuitable vehicles use this lane regularly.
<b>1146</b>	Object	Policy SAD.31 – Land East of	The Agency cannot support the sites allocation for employment use at this stage as we do not consider that sufficient evidence has been provided to demonstrate that development on the site

<b>Highways Agency</b>		Waterwells Business Park	would not have an adverse impact on the capacity and junction of J12 of the M5. we note that the site was previously allocated within the adopted plan for employment purposes. However the Agency considers that circumstances have changed within the area since its original allocation and cannot therefore support at this stage its continued allocation, without further certainty regarding a solution for J12.  Comments also submitted to Land East of Waterwells Business Park - Planning Brief.
<b>1449</b> <b>Gloucestershire County Council</b>	Comment	Policy SAD.31 – Land East of Waterwells Business Park	We would support the implementation of Policy CA1 'City Centre Boundary', in the Central Area Action Plan, to this site. As an out of centre location office use should only be permitted in 'exceptional circumstances'.
<b>1391</b> <b>Mr Paul Grint</b>	Object	Policy SAD.31 – Land East of Waterwells Business Park	I understand that the showmen's guild have expressed an interest in land designated under SAD31. As a resident of Needham Avenue (off Naas Lane) I would like to register by objection to their plans. We already have an undesirable and unwelcome 'settlement' of travellers nearby, we do not need to add to it.
<b>1366</b> <b>IM Group</b>	Support	Policy SAD.31 – Land East of Waterwells Business Park	The policy as stated in the first sentence (paragraph 4.224) 'Land to the east of Waterwells as shown on the proposals map is allocated for B1 employment use' is supported. There is an established strategic need for additional employment allocations in Gloucester City and this particular area is a logical extension to the existing Waterwells Business Park.  However objection is raised to the contents of the paragraph (paragraph 4.226) of the Draft Policy that refers to allocating land within this larger area for a new Showmen's Guild Site.
<b>1366</b> <b>IM Group</b>	Object	Policy SAD.31 – Land East of Waterwells Business Park	The proposal to allocate land at Naas Lane as a new Showmen's Guild site is the subject of objection.  It is considered that there is no justification for the allocation of a Showmen's Guild site on this land.  This site does not meet the criteria of Circular 22/91 (paragraph 7) Travelling Showpeople, and the Council does not follow the approach to site considerations included in that Circular. There is no published justification of need for this particular land for such as use, and the Council has not followed the procedures for addressing provision of Showpeople's accommodation as included in the Circular. Further, no proper consideration of alternatives has been provided to justify such a proposal, and in this respect part of Appendix 3, as referenced in paragraph 4.229, relating to this matter is considered to be completely inaccurate. Having referred very briefly to Circular 22/91, the objection letter suggesting the allocation of a Showman's Guild site at Naas Lane does not follow the guidance contained in the Circular in terms of justification of need or site consideration and selection.

		<p>The designation of the Travelling Showpeople's site at Naas Lane does not satisfy significant elements of the site criteria set out in Circular 22/91 Travelling Showpeople - paragraph 7.</p> <p>Topography and vehicular access - although the site is 'reasonably flat' as recommended by the Circular, it does not have 'good vehicular access' at the present time, with frontages to Naas Lane, a highway with no speed restriction other than the national 60 miles per hour, and with two tight bends. The route from the main highway network is via Naas Lane, and an extended cul-de-sac serving Waterwells Business Park and various other commercial premises and dwellings.</p> <p>Convenience for schools and community facilities - The Circular specifies how sites should 'be reasonably convenient for schools'. The nearest primary school is more than 0.85 miles away from the site and the nearest secondary school is approximately 1 mile away. Further schools can be found more than one mile away but such distances are even less convenient.</p> <p>According to the Circular, Travelling Showpeople's sites should also 'be reasonably convenient for...other community facilities'. With regard to health facilities, there are no dentist's surgeries within a mile of the site and only two doctor's surgeries - approximately one mile away. In terms of shopping facilities, there are no supermarkets, convenience stores, or newsagents within one mile of the site. The nearest post office is approximately 0.78 miles away. There are no banks or building societies within one mile of the site. The nearest is a Cheltenham and Gloucester branch 1.03 miles away and the nearest banks are over 2.5 miles away.</p> <p>Nuisance neighbours - The Circular specifies how 'the potential nuisance to neighbours from vehicular movement and the maintenance and testing of equipment' should be considered in the selection of sites for Showpeople. The suggested site is in close proximity to established residential properties to the south-west of the site and to the north-west of the site along Naas Lane.</p> <p>In contrast to the inadequate case to justify the Showmen's Guild site selection on this land, there is an established and overwhelming case for the whole of the area of land to the east of Waterwells Business Park to be allocated for B1 employment use. There is a strategic employment case for this land, insofar as there is an established shortfall of provision for employment within the City, and this is referred to in both the current preferred options document (paragraph 4.148) and within other documents published by the City Council, including the Core Strategy preferred options consultation paper (paragraph 4.17 and 4.50) and the employment land supply 2005 position statement.</p> <p>The Employment Land Supply report shows an 'overall shortfall of 31.48 hectares of employment land compared to the indicative level of provision set out in the Structure Plan Second Review'.</p>
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			<p>Additionally, the report explains that 'the main reason for this is due to the loss of large employment sites', including RAF Quedgeley, where the committed mixed-use scheme involves a net loss of employment land.</p> <p>The report confirms the potential for allocating new employment land or new business parks in Gloucester is 'relatively limited' due to 'the fixed city boundary and the surrounding greenbelt'.</p> <p>The report concludes with the statement that 'given the identified shortfall in employment land the City Council will only permit in exceptional circumstances the loss of land currently in use or identified for employment purposes'.</p> <p>Bearing in mind this statement and the large amount of residential development committed at nearby Kingsway and Hunts Grove, approaching 4000 dwellings overall, with the need for the residents to have the opportunity for finding employment relatively close to their homes and without the need for utilising private cars for lengthy commuting journeys, there is an extremely strong justification for retaining the total employment allocation on the land to the east of Waterwells Business Park.</p> <p>In these circumstances, it is imperative that the whole of the area east of Waterwells Business Park is safeguarded as employment area allocation and not utilised in part for another use i.e. Showmen's Guild site.</p> <p>The land is also considered to be the logical area to extend the existing and committed Waterwells Business Park, as confirmed in paragraph 4.224. The total area was allocated for B1 Employment Use in various previous publications by the City Council, including the SAD Issues and Options Paper (October 2005) as well as the Second Stage Deposit Draft Local Plan (August 2002).</p> <p>Finally, IM Properties has held the site for their own use and development in conjunction with the existing operations on land to the north, and therefore object to a proposal allocating their land for a third party use.</p>
<b>1368</b>	Object	Policy SAD.31 – Land East of Waterwells Business Park	Personal research has indicated the site in question has been purchased thus making it unavailable to the Showmen's Guild. Please explain.
<b>Mr Charles Deakin-Stevens</b>			
<b>1371</b>	Object	Policy SAD.31 – Land East of Waterwells	Object to the proposed allocation of land to the east of Waterwells Business Park for B1 employment use and a new Showmen's Guild site.
<b>Pitman,</b>			

<b>Harthorn, Kain, Brake</b>		Business Park	See comments made to 'Land East of Waterwells Planning Brief'.
<b><u>Employment Allocations (Non-Central Area)</u></b>			
<b><u>Paragraphs 4.234 – 4.238</u></b>			
<b>1449</b> <b>Gloucestershire County Council</b>	Comment	Paragraph 4.237	We would support the implementation of Policy CA1 'City Centre Boundary', in the Central Area Action Plan, to these sites. As out of centre locations office use should only be permitted in 'exceptional circumstances'.
<b><u>Employment Commitments</u></b>			
<b><u>Paragraph 4.266</u></b>			
<b>1392</b> <b>Gloucester Securities Limited</b>	Object	Paragraph 4.266	<p>Nash Partnership act for Gloucester Securities Ltd who are prospective purchasers of land measuring 8.19ha at Spinnaker Park. The subject site is shown as a Class B2 and B8 employment commitment in Table 6 and paragraph 4.266 of the Preferred Options Consultation Paper. Several years of market evidence, and agents' advice, indicates that there is no existing or foreseeable future demand for Class B2 or B8 development in this location. Under these circumstances no rational developer would be prepared to pursue a speculative Class B2 or B8 development of the site.</p> <p>Our client will be submitting evidence in support of a proposal to allocate the subject site for alternative viable uses such as non B Class uses, or mixed-use development. We intend to submit evidence in support of this representation following the acquisition of the site. Our evidence will cover the following areas: environmental investigation of the subject site and adjacent sites; flood risk analysis; transportation; employment land supply/demand analysis; and housing land supply analysis.</p>
<b>1449</b> <b>Gloucestershire County Council</b>	Object	Table 6	We strongly object to the identification of a section of land to the east of the existing Park and Ride as an employment commitment. Waterwell's Park and Ride requires an additional 5 acres, in addition to the existing site, to expand the service to 1,000 spaces. On the Proposals Map, Part 10, an area to the east of Telford Way, which was suggested as a possible location for an extension by Crest Nicholson, is identified as 'B1 Employment Allocation' (which appears to be a mistake as this should be pink to identify a commitment). Before removing this objection an alternative site would need to be identified. As part of the County's strategy to create a ring of 1,000-space Park and Rides, serving the

			main radial routes into both Cheltenham and Gloucester, our aspiration is still to have a suitable site identified in the Local Development Framework. The need for an increase in the provision of Park and Ride on this route into Gloucester has been strengthened by both the Kingsway and Hunts Grove developments.
<b>1449</b> <b>Gloucestershire County Council</b>	Comment	Paragraph 4.266	We would support the implementation of Policy CA1 'City Centre Boundary', in the Central Area Action Plan, to these sites. As out of centre locations office use should only be permitted in 'exceptional circumstances'.
<b><u>Policy SAD.32 – South West Bypass Site</u></b>			
<b><u>Paragraphs 4.239 – 4.243</u></b>			
<b>0171</b> <b>Bovis Homes Limited</b>	Support	Policy SAD.31 – Land East of Waterwells Business Park	The principle of this policy is supported.
<b>0184</b> <b>Hempsted Residents Association</b>	Support	Policy SAD.31 – Land East of Waterwells Business Park	Policy is supported.
<b>0445</b> <b>Environment Agency</b>	Support	Policy SAD.31 – Land East of Waterwells Business Park	We support the reference within the supporting text of this policy regarding potential contamination (paragraph 4.242) and surface water discharge treatment (paragraph 4.243).
<b><u>Policy SAD.33 – IM Group Site, North of Naas Lane</u></b>			
<b><u>Paragraphs 4.244 – 4.252</u></b>			
<b>0171</b> <b>Bovis Homes</b>	Support	Policy SAD.33 - IM Group Site, North of	The principle of this policy is supported.

<b>Limited</b>		Naas Lane	
<b>0445</b>	Support	Policy SAD.33 - IM Group Site, North of Naas Lane	We support the reference in the supporting text of this policy regarding potential contamination (paragraph 4.251) and surface water discharge treatment (paragraph 4.252).
<b>Environment Agency</b>			
<b>1146</b>	Object	Policy SAD.33 - IM Group Site, North of Naas Lane	<p>The Agency reserves the opportunity to comment on this allocation in the absence of an appropriate solution for J12 of the M5. As per our previous comments we consider that there is also the potential for this to have an adverse impact on the capacity and function of J12 of the M5. We note that the site was previously allocated for B8 use, however this was justified by the aspiration for a rail freight terminal within this location, which we are now aware is not going to be implemented.</p> <p>We are also aware that major mixed-use development has been secured on the RAF Quedgeley site. The Agency is therefore concerned that the scale of these proposals alone will require additional capacity to be provided at J12 and at this time are not aware of any solution that has been agreed.</p> <p>The Agency would therefore reserve the opportunity to comment further in this site until a solution for J12 has been agreed and more detailed proposals are more forthcoming. The Agency is concerned that the allocation makes no specific requirement for the applicants to contribute to improvements in infrastructure. The Agency is also concerned at the increased flexibility provided within this policy, allowing for a more diverse range of employment floorspace including B1, B2 and B8, which may potential increase vehicular movements, which will need to be mitigated against.</p>
<b>1366</b>	Support	Policy SAD.33 - IM Group Site, North of Naas Lane	<p>This policy, proposing that this site is allocated for B1 (office and light industrial use) and B8 (storage and warehousing) is supported.</p> <p>Other matters relating to this policy are subject to a separate objection.</p>
<b>IM Group</b>			
<b>1366</b>	Object	Policy SAD.33 - IM Group Site, North of Naas Lane	<p>Although the principal elements of the Policy concerning the acceptable land uses and use class proposals are supported in a separate representation, there are two detailed matters which are subject to objection - as follows:</p> <p>The site shown on the IM Group site on the Proposals Map part 10 is not accurate. An area of land to the north, which is part of the existing operational site, has been omitted from the site and policy area. Correct site boundary provided.</p> <p>There is also an omission from Table 5 Draft Employment Allocations (Non Central Area) (paragraph 4.237) in relation to the IM Group site. The 'Allocation' column refers to B8 storage and warehousing only, and does not refer to B1 Office/Light Industrial, despite its inclusion in the policy itself.</p>
<b>IM Group</b>			

**Policy SAD.34 – Land South of the Junction between Eastern Avenue and Barnwood Road**

**Paragraphs 4.253 – 4.257**

<p><b>0171</b> <b>Bovis Homes Limited</b></p>	<p>Support</p>	<p>Policy SAD.34 – Land South of the Junction between Eastern Avenue and Barnwood Road</p>	<p>The principle of this policy is supported.</p>
<p><b>1401</b> <b>Glevum Land Limited</b></p>	<p>Object</p>	<p>Policy SAD.34 – Land South of the Junction between Eastern Avenue and Barnwood Road</p>	<p>The proposed allocation for B1 office / light industrial use is impractical and fails to acknowledge the problem associated with this site.</p> <p>It is situated at the junction of Eastern Avenue and Barnwood Road, along side Walls roundabout. The site is in several different ownerships and has a number of different land uses. In addition to part of the Territorial Army base, which is apparently surplus to requirements, there are several dwellings and a disused market garden.</p> <p>The value of the existing land uses and the problems of land assembly combine to undermine the economic potential for development. In addition, the problems of creating a suitable vehicular access and dealing with potential contamination should not be underestimated.</p> <p>At present the site is a wasted asset. It is in a prime brownfield urban location that has not been brought forward for redevelopment despite a similar Local Plan allocation to the one now proposed. The reason is simply one of economics. The potential return from a B1 office / light industrial use is not sufficiently rewarding even to attract sufficient interest to invest in preliminary investigations.</p> <p>In order to secure redevelopment, it is necessary to allocate a sufficiently high value land use; one that will attract potential investors and enable all of the land to be assembled.</p> <p>The most obvious potential uses are retail and residential. Bearing in mind the desire of the LPA to achieve a ‘landmark’ building alongside Walls roundabout, residential use in the form of apartments might be the most appropriate solution. These could be designed with the necessary style, massing and height to create the sort of prestigious building that the LPA seek. It might be possible to</p>

			<p>incorporate a small element of employment use within a mixed - use scheme, particularly if it included 'home and / or serviced office provision'</p> <p>For these reasons objection is lodged to the present allocation and a residential or mixed residential / B1 office use, where residential dominates, is proposed.</p>
<b><u>Policy SAD.35 – Land Adjacent to Wall’s Factory</u></b>			
<b><u>Paragraphs 4.258 – 4.265</u></b>			
<b>0171</b>	Support	Policy SAD.35 – Land Adjacent to Wall’s Factory	The principle of this policy is supported.
<b>Bovis Homes Limited</b>			
<b>0445</b>	Support	Policy SAD.35 – Land Adjacent to Wall’s Factory	We welcome the inclusion of paragraph 4.265 that refers to the need to attenuate and treat surface water through the use of a sustainable drainage system that forms the basis of a flood risk assessment.
<b>Environment Agency</b>			
<b>1429</b>	Object	Policy SAD.35 – Land Adjacent to Wall’s Factory	<p>Support the identification of land adjacent to the Walls Factory. Whilst we support the general allocation of the site, we request that further consideration is given to widening the acceptable uses listed in Policy SAD35 to reflect its sustainable location. Given the site is in an employment area with good transport links, the list of acceptable uses should be widened to allow Use Classes B1, B2 and B8. We also maintain that there is a case for some leisure/retail activity on this site and that other uses which would support the employment activity or are otherwise appropriate in an employment area should be allowed.</p> <p>We request that the allocation under Policy SAD35 should be amended accordingly.</p>
<b>Peveril Securities Limited</b>			
<b>1429</b>	Comment	Policy SAD.35 – Land Adjacent to Wall’s Factory	<p>We are writing in our capacity as the planning consultants to Peveril Securities Ltd who are the development partner of Unilever Ice Cream and Frozen Foods. You may recall that we wrote to you on 18 November 2005 setting out our comments on the emerging proposals affecting part of Unilevers landholding at Barnwood, known as land adjacent to the Walls Factory. We are pleased to note that the Site Allocations and Designations (Non-Central Area) Preferred Options Consultation Paper allocates Unilever’s land for development. We also note the requirement for land to be safeguarded for a high speed bus link from Elmbridge Parkway Station as well as a requirement for a Travel Plan and Flood Risk Assessment to be submitted with any future application.</p> <p>Whilst we support the general allocation of the site we request that further consideration is given to</p>
<b>Peveril Securities Limited</b>			

			<p>widening the acceptable uses listed in Policy SAD35 to reflect its sustainable location. Given that the site is in an employment area with good transport links the list of acceptable uses should be widened to allow Use Classes B1, B2 and B8. We also maintain that there is a case for some leisure/retail activity on this site, and that other uses which support the employment activity or are otherwise appropriate in an employment area should be allowed.</p> <p>We would therefore request that the allocation under Policy SAD35 - Land adjacent to the Walls factory be amended to widen the list of acceptable uses to B1, B2 and B8, leisure, and retail. A mixed use allocation would therefore be appropriate.</p> <p>We would be keen to meet further to discuss the site as our clients are seeking the submission of a planning application shortly.</p>
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**Policy SAD.36 – Extension to Quedgeley District Centre**

**Paragraphs 4.267 – 4.269**

<b>0171</b>	Support	Policy SAD.36 – Extension to Quedgeley District Centre	The principle of this policy is supported.
<b>Bovis Homes Limited</b>			

**Policy SAD.37 – Town Ham Allotments**

**Paragraphs 4.270 – 4.272**

<b>0171</b>	Support	Policy SAD.37 - Town Ham Allotments	The principle of this policy is supported.
<b>Bovis Homes Limited</b>			
<b>0649</b>	Support	Policy SAD.37 - Town Ham Allotments	<p>The Showmen's Guild of Great Britain supports the allocation of land at Town Ham Allotments as an extension to the existing Showman's Guild site at Poole Meadow which is currently overcrowded. There is at present a recognised need for additional sites for some 40 families in the Gloucester area. The Showmen's Guild urge the Council to take urgent steps to remediate any contamination of this site and to bring it forward and to make it available to address this identified need as soon as possible.</p> <p>The Showmen's Guild will be undertaking ongoing discussions with Officer's from the Council in order</p>
<b>The Showmen's Guild of Great Britain</b>			

<p><b>1366</b></p> <p><b>IM Group</b></p>	<p>Support</p>	<p>Policy SAD.37 - Town Ham Allotments</p>	<p>to ensure that the needs of travelling showpeople in the Gloucester area are met as soon as possible.</p> <p>There is support for this policy for the extension of the existing Showmen's Guild Site to the site of the former Town Ham Allotments. The site is ideally located in relation to the existing site and facilities at Pool Meadow, being well established and close to other social community facilities.</p> <p>The designation of the Travelling Showpeople's site at Pool Meadow and Town Ham satisfies all significant elements of the site criteria set out in Circular 22/91 Travelling Showpeople, paragraph 7.</p> <p>The circular specifies how sites should be 'reasonably convenient for schools'. The nearest primary school is only three quarters of a mile away from the site with a total of 12 primary schools within two miles of the site. Three secondary schools can be found less than one mile away from Pool Meadow. It is considered that these represent convenient distances too schools.</p> <p>According to the Circular, Travelling Showpeople's sites should 'be reasonably convenient for...other community facilities'. With regard to health facilities, there are six dentist's surgeries and four doctor's surgeries less than one mile away. In terms of shopping facilities, there are four supermarkets, two convenience stores, two newsagents, and a post office within one mile of the site. There are a total of 19 banks/building societies less than one mile from the site.</p> <p>Because of the stated need to address the site issues at the adjoining Pool Meadow site, it appears necessary to address the conditions referred to in the proposed policy concerning 'resolution of contamination and ground condition issues'. The opportunity should not be lost to safeguard the allocation, to ensure eventual implementation of this proposed extension. There appears to be no case for the suggested public open space use proposed as a possible fall back allocation for this particular site.</p>
<p><b>1366</b></p> <p><b>IM Group</b></p>	<p>Object</p>	<p>Paragraph 4.271</p>	<p>The contents of this paragraph are subject to objection, since it is considered that the site at Naas Lane, owned by the IM group, does not meet the criteria contained in paragraph 7 of Circular 22/91, Travelling Showpeople. Additionally, the proposed allocation has not followed the approach to site consideration laid out in Circular 22/91 at paragraph 15. Additionally, there is no justification provided or demonstration of need contained within the published documents, and the procedures for consideration of sites for travelling showpeople as included in paragraph 15 of Circular 22/91 have not been exhausted by the City Council. Finally there is grave concern at the lack of prior consultation/discussion with the landowners of the land at Naas Lane, the IM Group, prior to the inclusion of this particular proposal in the document. The proposal appeared for the first time in the preferred options SAD document in August, and was not proposed or discussed at any prior stage, including the Issues and Options stage.</p>
<p><b>1368</b></p>	<p>Object</p>	<p>Town Ham</p>	<p>In relation to the former Town Ham Allotments, you admit that the city council is investigating the</p>

<b>Mr Charles Deakin-Stevens</b>		Allotments	contamination and that once the work is completed, a decision can be reached. I object to it being proposed as a suitable site for the guild because it is not a solution to 'the problem' of overcrowding; mainly because the timescale is too far in the future and too much rides on the investigations underway. How can it even be considered when the results could make the land unusable?
<b>1540</b>	Object	Policy SAD.37 - Town Ham Allotments	This land should be returned to open space.
<b>Mr Ray Armishaw</b>			Object to this site being extended for the Showmen's Guild. Amongst other things the site is subject to contamination, and the use does fit in well with the surrounding residential areas.
<b><u>Policy SAD.38 – New Community Facilities</u></b>			
<b><u>Paragraphs 4.273 – 4.278</u></b>			
<b>0171</b>	Support	Policy SAD.38 - New Community Facilities	The principle of this policy is supported.
<b>Bovis Homes Limited</b>			
<b><u>Appendices</u></b>			
<b>0942</b>	Comment	Appendix 1	English Nature is able to confirm that you have listed all of the relevant SSSI's that fall within Gloucester City. You have however omitted Horton Road Cemetery Local Nature Reserve from the list and one proposed LNR - Podsmead Pond.
<b>English Nature</b>			
<b><u>Objection Sites</u></b>			
<b>1498</b>	Comment	Land at Church Farm, Hempsted	Land at Church Farm Hempsted should be allocated for residential development in the longer-term. The land is part of the Church Farm Hams, a 65-acre family owned holding. Most of the farm is entered into the Countryside Stewardship Scheme. However the field proposed for development was unsuitable for the scheme. Although it is in a Landscape Conservation Area, it is questionable whether development in this corner would detract from particular landscape qualities or character of the area. The line of the 'cordon sanitaire' dissects the field but the proposed site is outside the boundary. Scope to include within a development scheme, further biodiversity benefits.
<b>Mr Richard C T Snell</b>			

**Sustainability Appraisal**

<p><b>0215</b> <b>Mr C Taylor</b></p>	<p>Object</p>	<p>Sustainability Appraisal</p>	<p>In my opinion Article 10 (monitoring) of the SEA Directive has not been fully regarded.</p> <ul style="list-style-type: none"> <li>• The word 'monitoring' is not to be found anywhere in the report.</li> <li>• Baseline information and indicators have been identified which are relevant to the objectives but how are these to be implemented?</li> <li>• There is no suggestion that the indicator will actually be monitored.</li> <li>• There is no suggestion of how indicators will be monitored.</li> <li>• There is no suggestion of who is to carry out the monitoring.</li> <li>• There is no suggestion as to who collates the monitoring information.</li> </ul> <p>When changes from the plan are identified what are the 'boundaries of change - at what point does 'remedial action' take place.</p> <p>There is no suggestion to what happens when non-conformance is identified. As the directive states 'monitoring...inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake remedial action'. What is your proposed remedial action when non-conformance is identified?</p> <p>The SEA will only become real if effects are monitored, which feed back into improved policies, plans and programmes. Otherwise the SEA/SA is just a tick-box exercise. All of the above points, although costly to implement, could save time and money later on down the line when planning appeals come through because of developments outside the plan.</p> <p>On top of the requirements of the Directive why doesn't Gloucester City Council lead the way on SEA follow-up activities (monitoring etc). Use the plan to identify who is responsible for identifying non-conformance. Use an Environmental Management System approach that requires an environmental management plan.</p>
<p><b>0323</b> <b>Network Rail</b></p>	<p>Object</p>	<p>Paragraph 5.115</p>	<p>The sustainability appraisal para 5.115 contains several qualifications - which imply that there is a high level of uncertainty about the Community Stadium proposal on the Railway Triangle site coming forward. The sustainability appraisal has not taken into account the consequential effects that providing for a community stadium in the development plan documents has on the Railway Triangle (northern). There is no assessment of the impacts that a speculative aspiration has on the regeneration potential of the Railway Corridor and the implications in terms of the lost opportunities</p>

			<p>and time delays in delivering on the broader regeneration and redevelopment objectives (contained in the Area Action Plan and through to the Core Strategy document). The inclusion of the aspiration of a Community Stadium on the Triangle site acts against any meritorious alternative coming forward whilst this concept exists. There is no link in the documents between a decision of the Club to remain on its existing site and the need to remove the development policies which apply to its development on the (Northern) Triangle site. The potential for blight while a decision is delayed or not taken is considerable in terms of achieving the overarching regeneration and community improvement objectives in the AAP and in the Core Strategy.</p> <p>Changes sought:</p> <p>Paragraph: 5.116 should be supplemented by the sentence:</p> <p>"If definitive proposals for the Club's relocation from the site does not eventuate within 1 year from the adoption of this plan, then all references to accommodating it on the (Northern) Railway Triangle site will be deleted" - or similar wording.</p>
<b>1146</b> <b>Highways Agency</b>	Comment	Sustainability Appraisal – Land East of Waterwells Business Park, and IM Group Site	<p>The Agency note the comments made within the Sustainability Appraisal in relation to the above allocations and we maintain our concern that sites SAD.31 (Land East of Waterwells Business Park) and SAD.33 (IM Group Site) are not within the most sustainable locations and more importantly fail to reflect the guidance within PPG 13 Transport relating to sustainable transport objectives.</p> <p>Whilst the Agency recognises that the proposed 'do nothing scenario' for these sites may not offer the best long-term approach we consider that at this stage no further development within this location can be supported until capacity issues relating to J12 of the M5 are resolved (as an impact from existing development commitments).</p>
<b>1452</b> <b>Sylvanus Lyson's Charity</b>	Object	Sustainability Appraisal	<p>With regard to the Sustainability Appraisal, it is considered that insufficient weight has been attached to the "acute housing need" that has been identified as one of the key sustainability issues for Gloucester [page 6].</p> <p>The Charity does not consider that proper consideration has been given to the Hempsted land through the Sustainability Appraisal process. The Hempsted land is readily accessible to the City Centre, has access to existing facilities in Hempsted Village, is closely associated with existing employment opportunities and has ready access to recreational areas adjacent to the River Severn and more locally in the form of existing play areas and other facilities. The site is also within a single ownership, and can be brought forward for development at the earliest opportunity. Not only will it make a contribution to meeting demand for market housing but will also provide affordable housing.</p>

			<p>There is the opportunity for land owned by the Charity to be considered comprehensively with land owned by the City Council adjacent and currently in open space use. This matter has been the subject of tentative previous discussions between the Charity's agents and the City Council. Such a comprehensive approach could very well lead to a more appropriately located central open space which would be better positioned in respect of the majority of the existing village of Hempsted and would allow further residential development along the line of the Hempsted Bypass.</p> <p>This is a matter on which the Charity would be prepared to enter into further discussions with the City Council and local interests in order to develop a Masterplan, the provisions of which could be incorporated in the Submission document. An arrangement such as that put forward by the Charity would also mean consequential changes to the section of this document dealing with "community provision".</p>
<b><u>Proposals Map</u></b>			
<b>0399</b> <b>Cheltenham</b> <b>Borough</b> <b>Council</b>	Object	Proposals Map	An urban extension to the north of Gloucester has not been shown on the Proposals Map to provide for 2,000 dwellings.
<b>0445</b> <b>Environment</b> <b>Agency</b>	Object	Illustrative Material	In accordance with Regulation 26, at the preferred options stage LPS's should prepare maps to help identify various sites and areas relating to the policies. We do not consider that this has been achieved as only the objection sites are illustrated in plan form. None of the policy designations are shown in map form.
<b>1447</b> <b>Gloucestershire</b> <b>County</b> <b>Council</b>	Object	Proposals Map	The WLP allocations at Sudmeadow, Hempstead (Inset 3), the Reclaimed Canal Land, Netheridge (Inset 6), the Railway Triangle Site (inset 11), Land Adjacent to Sudmeadow, Hempsted (Inset 12) and Land Adjacent to Gas Works, Bristol Road (Inset 20) are not identified on the Proposal Map. Paragraph 2.22 of PPS12 states "District planning authorities must also include on their adopted proposals map, minerals and waste matters including safeguarding areas, minerals consultation areas and any minerals and waste allocations which are adopted in a development plan document by the county council." This advice needs to be taken on board. In addition, I draw your attention to Policy 7 of the WLP.
<b><u>Tests of Soundness</u></b>			

<p><b>0494</b></p> <p><b>Government Office for the South West</b></p>	<p>Comment</p>	<p>Tests of Soundness - Test IV</p>	<p>PPS 12 sets out the elements of provision that spatial plans should include and we consider that your plan may be at risk of being found unsound unless further work is carried out before progressing to the next stage.</p> <p>For example, PPS 12 refers to implementation, monitoring and phasing provision - the site-specific policies lack this information and read more like Local Plan policies than policies for the delivery of agreed outcomes. There are few details on individual site constraints or how these will be overcome. In some policies, such as SAD.28, the document suggests that issues around contamination can be considered after consent has been granted - but this appears contrary to PPS12 which states that site allocations should be suitable and available.</p> <p>The Plan should also make clearer how the plan has taken account of other service provider requirements e.g. agencies providing services in the area including their future plans. What for example are the likely requirements within the plan period for religious, health, and educational facilities? Based on the additional 3,000 homes being proposed in the area, what sites have been considered to meet their needs?</p> <p>It should also show how it relates to other strategies in more detail. For example, when is the cycle route improvements required in order to deliver LTP targets? What are the targets? It is not clear whether waste and renewable energy strategies have already been taken into account. Some sites in the City could offer a good opportunity to integrate renewable energy and waste management facilities that should be explored in consultation with the County Council and waste/energy sectors as part of this document preparation.</p> <p>In line with PPS7, you may wish to reconsider Policy SAD.2. PPS7 states that local landscape designations should only be maintained where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDD's should state what it is that requires extra protection, and why. The Plan does not appear to have done this to a satisfactory level and may as a consequence be found unsound. In addition, paragraphs 3.5 and 3.6 seem to be at odds with one another.</p>
<p><b>0494</b></p> <p><b>Government Office for the South West</b></p>	<p>Comment</p>	<p>Tests of Soundness - Test VI</p>	<p>There are many policies which appear in this Site Allocations and Designations Plan that replicates policy provision elsewhere in the LDF. We welcome the documents cross-reference to other LDF policies but it would be helpful if it stated which DPD's each policy is contained in.</p> <p>There is no reference to proposals within adjoining local authority boundaries that may impact on sites within Gloucester City Council's area, for example Hunt's Grove in Stroud District Council, etc. How will the timing and other delivery issues of such sites affect delivery of sites within Gloucester City's</p>

			control? What mechanisms are in place for dealing with these? Is there a need for joint arrangements to ensure delivery of key infrastructure requirements?
<b>0494</b> <b>Government Office for the South West</b>	Comment	Tests of Soundness - Test VII	There appears to be a lack of clear justification for some of the options chosen, for example ecological issues on the Oil Storage Depot are reported to be a factor preventing higher housing density, but this is not referred to in the Options Summary Table; the B&Q site refers to retail provision but it is not clear what evidence of need there is - how up-to-date is your retail study and what does it say in this respect? Without this information it is difficult to assess how such conclusions have been reached.
<b>0494</b> <b>Government Office for the South West</b>	Comment	Tests of Soundness- Test VIII	As stated under Test VI,, the document should refer much more to implementation, monitoring and phasing, including key milestones. This information should be provided on key sites that contribute to the targets identified in the Core Strategy. It should make clear who is intending to implement each policy (including evidence of commitment from the relevant organisations) and how key objectives will be achieved.

