

Site Allocations and Designations (Non-Central Area) Issues and Options Consultation Paper – Response Schedule

General

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Mark Thomas	All	Comment	Gloucester has a rich heritage that has been ruined in recent times. Whatever developments take place there needs to be an element of quality that has been lacking in recent times. Gloucester is in serious danger (if it has not already) of becoming a soul-less clone city. Any further developments in the Docks need to be more sympathetic to the historic heritage than the West Quay development.		<p>Comment noted. The Council will through the LDF seek high standards of design in line with national policy.</p> <p>The Central Area Action Plan will ensure that new development in Central Gloucester has full regard to the City's important heritage.</p>
Mark Thomas	All	Comment	There should be no more supported housing built. Gloucester has more than its fair share and it attracts a disproportionate number of people with social problems.		<p>Disagree. The Housing Needs Survey for Gloucester (2005) demonstrates a significant need and backlog of need for affordable housing. In light of this evidence we will require affordable housing provision on all new residential</p>

					developments of 15 or more dwellings.
Mark Thomas	All	Comment	Quality retail should be included.		Comment noted. Proposals for the bus station will provide additional major new shopping development in the City Centre.
Matthew and Jane Stevens	Suggest new allocation	Support	<p>Disappointed there is no reference to the need to a new travelling show peoples site.</p> <p>One site that seems to have great potential is a piece of land east of Waterwells bordered by Naas Lane and the railway line (as shown in appendix 8 – existing draft employment allocations).</p> <p>The site meets many of the criteria set out in Circular 22/91 regarding the need for show-peoples sites, and seems to be large enough to meet the need for a new site if developed in line with the standard model plan as agreed by the showmens and the DOE.</p>		Agree. This site is considered suitable for the suggested use and this is reflected in the preferred option set out in the draft document as well as the draft development brief for the site, which has been prepared separately.
Signet Planning representing Peveril Securities Limited,	All	General Comment	With particular regard to the sustainability appraisal, Gloucester County Council's Local Transport		The preferred site allocations set out in the draft document take into

development partner of Unilever Ice Cream and Frozen Foods			Plan for 2006/11 has been published and assume that the potential choices of sites for various uses in the LDF will take account of existing and proposed improvements to public transport that affect Gloucester.		account a number of factors including existing and proposed transport infrastructure such as the potential high-speed bus link from the Parkway Station at Elmbridge.
Boyer Planning representing the Trustees and Beneficiaries of Winnycroft Farm	Housing and Green Field Sites	Object	<p>Responses were sent in with regard to the revised Issues and Options consultation on the Core Strategy where attention was drawn to the fact that the strategic housing requirement for Gloucester has not yet been determined through the emerging RSS 10 and therefore in the meantime it is inappropriate for the Council to progress a strategy that fails to evaluate the relative merits of different greenfield site options.</p> <p>In response to Core Policy 2 it was stated that consideration should be given to potentially suitable greenfield sites having regard to::</p> <ul style="list-style-type: none"> • The likely scale of housing provision which the LDF will need to accommodate • The potential benefits of greenfield land release in appropriate circumstances to deliver a range and 		<p>The draft Regional Spatial Strategy for the South West has been formally submitted for approval. Although the strategy is yet to be considered through an examination, it is reasonable to assume that Gloucester will be required to accommodate approximately 575 dwellings per year over the next 20 years.</p> <p>Full consideration has been given to the RSS housing requirement in the preparation of both draft documents.</p> <p>Based on existing planning permissions and proposed allocations on previously developed land, sufficient land is available to meet the</p>

			<p>choice of housing opportunities, physical and social infrastructure improvements and other planning benefits</p> <p>Therefore concerned to note that this document does not pay regard to potential greenfield housing sites. If the Council intends to progress this aspect of the LDF ahead of RSS 10, it is especially important that all such options are fully considered if the resultant strategy is to be sufficiently robust.</p>		<p>City's housing requirements until about 2020. This excludes windfall development.</p> <p>A review of the LDF will consider closer to that time whether there is a need for greenfield releases. At this stage they are not however needed. No change.</p>
Mark Price on behalf of the Theatres Trust	Cultural Activities	Object	<p>Concerned at the lack of reference to cultural activities in general and the performing arts in particular. It is important to undertake a need and impact assessment for cultural provision, in particular theatre, within the town centre and surrounding area. The provision of cultural facilities is an essential factor to take into account when drafting Development Control Policies.</p>		<p>The Central Area is the focus of most cultural activities in the City.</p> <p>The issue of theatre provision is addressed in the Central Area Action Plan.</p> <p>The draft policy for the Greater Blackfriars area includes reference to the potential provision of a new theatre as part of a comprehensive mixed-use development scheme.</p> <p>No change.</p>

<p>Government Office for the South West</p>	<p>General</p>	<p>Comment</p>	<p>The general layout and terminology is very good and easy to follow and we welcome the inclusion of question boxes, maps and photographs. But like the Area Action Plan the document currently lacks reference to the evidence bases used to back up assumptions made throughout it and it is not clear how input/discussions/consultations events with other key stakeholders have helped to inform the document to date.</p> <p>It also lacks reference to how proposals relate in terms of outputs and timescales to other key plans and programmes, for example the Local Transport Plan, Community Strategy, the programmes/projects of the RDA and GHURC. Inclusion of this information at an early stage would help demonstrate the spatial approach to planning and corporate 'but-in' of proposals where these have already been established.</p> <p>The document would also be enhanced by the inclusion of clear measurable objectives and targets and an understanding of just how many sites would be needed to meet the needs of the City. For</p>		<p>Amend draft document to clarify the basis on which policies and proposals are put forward.</p> <p>Insert reference to other relevant plans and programmes where appropriate.</p> <p>Amend draft document to provide further clarification in relation to the City's housing requirement.</p> <p>Amend document to provide further detail in relation to infrastructure requirements and other relevant issues.</p>
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			example, without knowing the capacity of each site, it's difficult at this stage to see just how many of the potential housing sites would actually be needed. It would also be very helpful to include possible phasing of all sites and any likely infrastructure requirements associated with them.		
Government Office for the South West	Gypsy Sites	Object	There doesn't appear to be any sites suggested for gypsy provision – what is the City's need for such sites, and if there are no current needs identified, will you be including a criteria based policy in your DC document to cover any applications for such?		Comment noted. There is no defined need for a new gypsy site in Gloucester. A criteria based policy will however be included in the submission Development Control Policies DPD in order to deal with any speculative proposals should they be received. There is a need for a new travelling showperson's site and this is recognised in the draft allocation of land to the east of Waterwells Business Park.
Government Office for the South West	Paragraph 1.5	Object	Why should the document be read in conjunction with the Area Action Plan rather than the Core Strategy? Shouldn't the document		Comment noted. Amend document to clarify chain of conformity and relationship to other

			be in conformity with the Core Strategy?		Development Plan Documents.
Government Office for the South West	Page 9 – 16, and Page 42, 44, 46, and 51	Object	The seems to be a lot of Development Control/Core Strategy related elements in this document that do not appear to be proposing new sites but seek to protect existing ones. These provisions do not sit comfortably in this type of document and should be relocated elsewhere in the LDF.		Disagree. Whilst the Development Control Policies and Core Strategy documents set out a number of policies designed to safeguard certain sites/areas, it is through the Site Allocations and Designations document that the boundaries and extent of these sites/areas will be determined.
Robert Niblett on behalf of Gloucestershire County Council – Sustainable Transport	Site Allocations and Designations Document	Support	Support Gloucester's objective of reducing the need to travel and would encourage the inclusion of requirements for not only safely accommodating the car but also offering real alternatives.		Support noted.
Robert Niblett on behalf of Gloucestershire County Council – Sustainable Transport	Transport Assessment	Comment	Emphasise the importance of detailed consideration of development sites through a Transport Assessment to ensure that the most is made of the opportunities that development in the City offers and to ensure that		Comment noted. Where it is considered appropriate the draft site allocations set out in the document specify a requirement for a Transport Assessment to be carried out.

			beneficial development is accommodated with the minimum impact.		
Ceri Porter on behalf of the Environment Agency	Paragraph 2.10	Support	<p>We support the inclusion within the document of the key spatial strategy objective:</p> <p>'Protecting environmentally sensitive parts of the City (e.g. floodplain and sites of Landscape and Nature Conservation importance).</p> <p>This does not however make reference to the need to 'enhance' as well as 'protect'.</p>		Support noted.
Signet Planning representing Peveril Securities Limited, development partner of Unilever Ice Cream and Frozen Foods	Key Issues	Object		<p>Suggest there are two further key issues that need to be considered:</p> <ol style="list-style-type: none"> 1. Provision of appropriate leisure facilities to serve the city 2. Provision of appropriate levels of retail floor space (both food and non-food) to serve the city <p>Suggest that the Council should prepare capacity</p>	<p>Agree that the provision of leisure facilities is an important issue. The importance of encouraging participation in healthy activities is recognised in the Core Strategy.</p> <p>The provision of new retail floorspace is also important and the need to provide a vibrant City Centre is also recognised in the Core Strategy.</p>

				studies relating to both retail and leisure floorspace with particular regard to any perceived market demands/needs for these sectors of the market.	The City Council has an up-to-date retail capacity study. No change.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Key Issues	Support	Agree with the stated key issues would add 'poor quality design of new buildings'. Many new buildings in Gloucester are architecturally uninspiring. Some of the new buildings in the Docks are good and complement the existing ones. Some do not, notably the new multi-storey car park. Tesco's and Sainsbury's at Barnwood are both run-of-the-mill supermarkets and no effort has been made to make them original or architecturally noteworthy.		Comment noted. The need to achieve high quality design and to avoid the mistakes of the past is recognised throughout the Local Development Framework including the Core Strategy and Central Area Action Plan.
Helen Lancaster on Behalf of English Nature	Key Issues	Support	English Nature would agree with the need to maintain existing areas of public open space and that new open space is provided as parts of new developments.		Support noted.
Peter Wray on behalf of the Highways Agency	Key Issue 3 – High Levels of In-commuting' and Key Issue	Support	Broadly support these key issues as consider they will have some positive impact on our network.		Support noted.

	4 – Traffic Congestion				
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Key Issues	Object	Kayterm acknowledges the importance of many of the key issues raised at paragraph 3.2 of the consultation document. However also note that these are not directly comparable with the revised draft 'Key Issues' that were included at the Issues and Options Stage 'Core Strategy' LDD.	Consider it logical if the key issues were the same across all LDD's.	This section has been deleted. The Core Strategy document is considered the most appropriate for setting out the key issues relating to the City as a whole.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Key Issue – Shortage of Employment Land	Support	Acknowledge the importance of this key issue as it has implications for the allocation of sites, with particular relevance in considerations relating to the re-allocation of employment sites for alternative uses.		Support noted. The shortage of employment land is a key issue and the draft Regional Spatial Strategy for the South West emphasises the need to balance new housing with the provision of employment opportunities. This is reflected in the LDF including the site allocations document.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Key Issue – Growth in the number of households particularly single person	Support	Support this key issue and consider that its implications should be drawn out.	Suggest helpful that the following key issue was instead identified: <ul style="list-style-type: none"> • 'Significant growth in the number of 	Comment noted. The need for new housing provision in the City is determined through the Regional Spatial Strategy for the South West, which

	households			households, leading to a need for increased housing provision’.	is based on changing housing trends and demographics. This is recognised in the draft document and throughout the rest of the LDF. No change.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Key Issue – ‘Acute housing need’ and ‘Homelessness’	Object	It is not simply a quantitative increase in affordable accommodation that is required in respect of housing issues in Gloucester. There is also a need to look at qualitative issues, and in relation to general housing development, not just affordable provision. It is important that new housing is developed that will cater for a range of needs and aspirations. Issues of housing choice and housing mix are important in promoting sustainable communities and a buoyant economy.		Agree in part. Housing need is a key issue as evidenced by the 2005 Housing Needs Survey which demonstrates significant evidence of need and backlog of need. A quantitative increase in affordable housing provision will help to address this need. In relation to open market housing the importance of providing a mix of different house types is fully acknowledged.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Key Issue – Many parts of the city have a designated landscape and/or nature	Support	As set out in previous representations (Core Strategy) Kayterm considers that it may be useful if the implications of the factual statement could be drawn out. The identified constraints on		Comment noted. The implications of landscape conservation areas and sites of nature conservation importance have been more fully

	conservation value		the development of the city mean that there is a need for 'creative approaches' in future proposals so that sustainable growth can continue to take place.		drawn out in the preferred option document.
Councillor Gordon Heath	Key Issues	Support	Agree with the issues identified.	Perhaps an extra one could be a lack of family housing in the city centre.	Agree. The Central Area Action Plan has been amended to include reference to the importance of retaining and providing a mix of house types in the City Centre including housing suitable for families.
Pat Roberts	Key Issues	Support	Support the key issues.	<p>Include:</p> <ul style="list-style-type: none"> • Lower than average take up of tertiary education • Lack of a powerful resident middle-class. 	<p>Comments noted. The issue of educational take-up rates is dealt with in the Core Strategy. It is pertinent to note however that the rate of take up of tertiary education in Gloucester is similar to the County average.</p> <p>Disagree.</p>
Ceri Porter on behalf of the Environment	Key Issues, Paragraph 3.2	Support	Support the inclusion of the 'citywide' issues concerning a large proportion of the City falling within	Therefore recommend removal of the reference to the River Severn.	Comment noted. Amend document to ensure that there are other

Agency			the River Severn floodplain. However the City contains other floodplains and areas at risk from flooding.		floodplains and thus areas at risk from flooding.
Ceri Porter on behalf of the Environment Agency	Key Issues, Paragraph 3.2	Object	The following issue is of most relevance to the natural environment, 'Many parts of the City have designated landscape and or nature conservation value'. However it only refers to designated interest and comes across a negative constraint rather than a celebration of the City's assets.		Comment noted. Amend wording to state that: 'There are numerous sites across the City that have landscape and/or nature conservation value, the most valuable of which are designated as areas of importance'.
Ceri Porter on behalf of the Environment Agency	Key Issues	Comment		Another key issue that we suggest is that parts of the natural environment are degraded and in need of enhancement or restoration.	Agree. Insert suggested wording.

Landscape and Nature Conservation

- Landscape Conservation Areas
- Sites of Nature Conservation Interest (SNCI's)
- Sites of Special Scientific Interest (SSSI's)
- Prime Biodiversity Areas (PBA's)
- Robinswood Hill Country Park
- Scheduled Ancient Woodland (SAW)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Chris Taylor	Paragraph 4.4 (Landscape Conservation Areas)	Object	There is no definition of an 'exceptional circumstance'. The get out clause is being used – but how do you weigh up the gains and the losses.	There should be a clearer methodology.	Agree. The Landscape Conservation Area Policy set out in the Development Control document sets out the detailed criteria against which development proposals within a landscape conservation area will be considered. The purpose of this document is to establish the boundaries of the LCAs. No change.
Chris Taylor	Paragraph 4.14 (SNCI's)	Object	Why not be stricter with regards to developing on A and B category sites? You are identifying them as important so surely the Council should keep its precedence within		The Council's current approach towards development affecting a Site of Nature Conservation Importance

			<p>a changing world where there is plenty of debate telling us to look after our biodiversity 'hotspots'.</p> <p>There is no mention with regards to developments (outside the designated boundary) which affect these sites and how they will be affected by the designation (like SSSI's). This needs to be clarified.</p> <p>How do you define if the benefits outweigh the impact of the development? The methodology needs clarifying.</p>		<p>is considered to be reasonable and pragmatic. It would be inappropriate and contrary to planning policy to preclude development entirely on SNCIs as most of these are local designations only.</p> <p>Amend text to refer to the potential impact of development that may be outside but adjacent to SNCIs.</p> <p>This will be a matter of judgement based on the nature conservation value of the site and the type of development proposed.</p>
Chris Taylor	Paragraph 4.26 (PBA's)	Object		This should encourage PBA's.	<p>Comment noted. The draft document identifies a Prime Biodiversity Area on the unbuilt land to the west of the Gloucester – Sharpness Canal.</p> <p>Other PBAs may be identified in the future</p>

					where this is appropriate. No change.
Chris Taylor	Appendix 2	Object	How are the public meant to comment on designation level and the location of SNCI's and SSSI's when the map has no key to distinguish between the areas of grey?		The map attached at Appendix 2 illustrates the extent of the City's Sites of Nature Conservation Interest. These include two SSSIs. The text of the document explains where these sites are. The draft document is accompanied by a Proposals Map showing in detail the location of all designated sites.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Landscape Conservation Areas. Paragraph 4.3.	Support	Prefer to retain the current designations as we know what they mean and they are self-explanatory. Any attempt to retain them by not drawing boundaries around them simply loosens any controls that may exist.		Agree that it is important to provide certainty through the delineation of boundaries to the Landscape Conservation Areas.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Sites of Nature Conservation Interest (SNCI's). Paragraphs 4.10 – 4.15	Support	Support issues for enhancing SNCI's especially with climate change having an effect. We accept the policy towards A and B, and C and D sites.		Support noted.

Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Prime Biodiversity Areas (PBA's). Paragraph 22.	Support	Support the designated areas especially along the River Severn as this complements protection offered by the floodplain designation. Part of this could be opened up to the public as an open space facility.		Support noted.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Robinswood Hill Country Park. Paragraph 4.27.	Support	This should be fully protected as an area of public open space.		Agree. Support noted.
Boyer Planning representing the Trustees and Beneficiaries of Winnycroft Farm	Landscape Conservation Areas	Object	<p>The Landscape Conservation Area no longer represents an appropriate basis by which to achieve the required protection for the most environmentally sensitive parts.</p> <p>PPS 7 makes it clear that the Government favours a criteria based approach to landscape policy, rather than the retention of locational designations. (Quote paragraph 24).</p>		<p>Disagree. PPS7 allows for the use of local designations provided they do not unduly restrict acceptable, sustainable development.</p> <p>The draft policy relating to Landscape Conservation Areas set out in the Development Control Policies DPD allows for appropriate forms of development provided certain criteria can be met. This is considered to be a reasonable and pragmatic approach.</p>

			<p>Our clients have previously carried out a detailed assessment of the Landscape Conservation Area with particular reference to Winnycroft Farm. This work has demonstrated that in relation to this site the designation is inappropriate in any event.</p> <p>We refer specifically to our responses to the First Deposit Draft Local Plan of June 2001 and the Green Areas Issues Paper of June 2000. These responses are underpinned by a document entitled 'Winnycroft Farm, Gloucester – Landscape Reappraisal' by David Jarvis Associates Limited of July 1999. Copies of these documents have been provided.</p>		<p>The LCAs have been drawn up on the basis of independent specialist landscape advice.</p> <p>The Winnycroft Farm site is discussed in the preferred option document. The reasons for not taking the site forward as a preferred option are clearly set out. These factors relate to a number of issues, not just the fact that the site is located within the Landscape Conservation Area.</p>
Helen Lancaster on behalf of English Nature	Landscape and Nature Conservation	Support	Wildlife sites are less likely to maintain their interest if they only survive as isolated sites. Links either in the form of wildlife corridors or areas that can act as 'stepping stones' between sites aids special dispersal. This is particularly important in view of the		Support noted.

			<p>possible effects of climate change – species may need to migrate from the areas that they currently occupy. Landscape Conservation Areas could also function as links and stepping-stones between habitats. This would be in line with guidance contained in paragraph 12 of PPS 9.</p>		
<p>Helen Lancaster on behalf of English Nature</p>	<p>Sites of Nature Conservation Interest</p>	<p>Support</p>	<p>Although these are not statutory sites they are still often highly important for wildlife. They often contribute significantly to targets for both habitats and species contained in the Gloucestershire Biodiversity Action Plan. They also perform an important function in linking areas of wildlife habitat. See CAAP Key Principle 1 comments.</p> <p>PPS 9 advises that criteria based policies should be established in local development documents against which proposals for any development on or affecting such sites will be judged. It could be argued that the approach of grading sites and having different criteria for where development is permitted meets this requirement. However it would also be helpful to have a greater degree of transparency both about the</p>		<p>Support noted.</p> <p>Agree that further information should be provided in relation to the grading of nature conservation sites and how the need for development will be assessed. This will be provided in the submission draft of the Development Control Policies DPD.</p>

			<p>grading of sites and how the need for a development is assessed.</p> <p>In line with the guidance contained in 'Environmental Quality in Spatial Planning' we would support work to restore and enhance the biodiversity of nature conservation sites. This is in line with the Government's objectives for the planning system as stated in PPS 9. PPS 9 also recognises that these sites can contribute to the quality of life and well being of the community and support research and education.</p>		<p>Support noted. The importance of restoring and enhancing biodiversity is recognised throughout the LDF including in particular the Core Strategy.</p>
<p>Helen Lancaster on behalf of English Nature</p>	<p>Sites of Special Scientific Interest</p>	<p>Support</p>	<p>As the Issues and Options Paper notes SSSI's are the country's very best wildlife and geological sites. Neither Hucclecote Meadows or Robinswood Hill Quarry are covered by any international designations so in order to meet the requirements of PPS 9, there must be policies in the plan which offer a degree of protection under the planning system. The current approach that is outlined appears to do this and we would support it being carried through into the LDF through the Development Plan Document.</p>		<p>Support noted.</p>

<p>Helen Lancaster on behalf of English Nature</p>	<p>Sites of Special Scientific Interest</p>	<p>Support</p>	<p>Robinswood Hill Quarry and Hucclecote Meadows – English Nature support approaches that enhance or add to the biodiversity on these sites provided they do not compromise any of the SSSI features of interest.</p> <p>Hucclecote Meadows in particular would benefit from access to the open countryside. A policy which sought to maintain such linkages, would be beneficial to the biodiversity of the site.</p>		<p>Support noted. Amend text to refer to the importance of linkages between SNCIs and SSSIs and surrounding greenspaces as a network of corridors for wildlife.</p>
<p>Helen Lancaster on behalf of English Nature</p>	<p>Prime Biodiversity Areas</p>	<p>Support</p>	<p>Would support the designation of the PBA on the un-built land to the west of the Gloucester and Sharpness Canal. As well as the potential to provide valuable wildlife habitat this area could also function as a wildlife corridor. Certainly agree that this area should be protected from inappropriate development, not only because of the potential wildlife gains but because much of the area appears to be in the floodplain. Any biodiversity gains identified for the area through the development must be clear and measurable.</p>		<p>Support noted. The Prime Biodiversity Area is identified in the preferred option draft document.</p>

<p>Helen Lancaster on behalf of English Nature</p>	<p>Robinswood Hill</p>	<p>Support</p>	<p>Would support the retention of Robinswood Hill as a protected area of public open space and site of nature conservation importance.</p>		<p>Agree. Support noted. This designation is included in the preferred option document.</p>
<p>Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College</p>	<p>Landscape</p>	<p>Object</p>	<p>With the commencement of the LDF process it is incumbent upon the Council to review landscape designations applying to potential housing sites in order to deliver sustainable development (PPS 7, Paragraph 25).</p> <p>Furthermore in relation to Local Landscape Designations PPS 7 (Paragraph 24) states that criteria based policies 'should provide sufficient protection for these areas without the need for rigid local designations that may unduly restrict acceptable, sustainable development and economic activity...'</p> <p>As such PPS 7 makes it clear that there is no fundamental requirement to continue with a local landscape designation of Landscape Conservation Areas within the LDF.</p> <p>This is particularly important where the site would represent the most sustainable site for housing as</p>	<p>Recommend the Landscape Conservation Area designation be deleted and a site-by-site policy led approach adopted to conform to policy guidance.</p>	<p>Disagree. PPS7 allows for the use of local designations provided they do not unduly restrict acceptable, sustainable development.</p> <p>The draft policy relating to Landscape Conservation Areas set out in the Development Control Policies DPD allows for appropriate forms of development provided certain criteria can be met. This is considered to be a reasonable and pragmatic approach.</p> <p>The LCAs have been drawn up on the basis of independent specialist landscape advice.</p> <p>The Frogcastle Farm site is discussed in the preferred option</p>

			measured against the criteria of PPG 3 (Paragraphs 30 – 33) in comparison to others considered in the LDF Core Strategy Issues and Options Paper.		document. The reasons for not taking the site forward as a preferred option are clearly set out. These factors relate to a number of issues, not just the fact that the site is located within the Landscape Conservation Area.
Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College	Sites of Nature Conservation Interest	Object	<p>Whilst accepting the general desirability for such designations these should be kept under constant review and we recommend that the Development Framework should reflect this to conform to planning guidance.</p> <p>Similarly with respect to such designations that affect sites considered suitable for development it is necessary to recognise that with appropriate design and mitigation/amelioration, development on sites can be achieved successfully without overriding harm to nature conservation interest. This is of particular importance where a site offers the most sustainable and appropriate location for development in all other aspects.</p>	Paragraphs 4.10 – 4.15 on Nature Conservation should reflect this.	<p>Support for the designation of sites of nature conservation interest noted. Amend text to state that sites will be kept under review through the LDF process.</p> <p>It is considered that the policy approach towards development affecting a site of nature conservation interest is worded so as to allow for appropriate forms of development subject to proper mitigation. No further change needed.</p>

<p>Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College</p>	<p>Prime Biodiversity Areas</p>	<p>Objected</p>	<p>Recommend Prime Biodiversity Areas be deleted from the Development Framework as they serve no purpose other than duplicating other national designations. This policy does not add to the effectiveness of the plan and is contrary to PPS 7 and PPS 12.</p> <p>Similarly with respect to such designations which affect potential sites suitable for development it is necessary to ensure consistency within the plan and flexibility, to recognise that with appropriate design and mitigation/amelioration development on sites can be achieved without overriding harm to biodiversity. This is of particular importance where a site offers the most sustainable and appropriate location for development in all other aspects.</p>	<p>Paragraphs 4.22 – 4.26 should reflect this.</p>	<p>Disagree. The PBA designation does not duplicate other areas of interest or constraint. It is a unique designation based on an area of particular concentrations of high priority habitats.</p> <p>Furthermore, the preferred option policy on the PBA does not preclude the possibility of development within this area. It allows for development provided that where possible, the development would lead to biodiversity gains in the area. This is considered to be a reasonable and pragmatic approach.</p> <p>No change.</p>
<p>Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc</p>	<p>Landscape</p>	<p>Object</p>	<p>Note at paragraph 4.8 that the Council do not consider a character assessment based approach to be appropriate for Gloucester, mainly as a result of its urban nature.</p> <p>However we observe that national</p>		<p>PPS7 allows for the use of local designations provided they do not unduly restrict acceptable, sustainable development. The draft policy relating to Landscape Conservation</p>

			<p>guidance (PPS 7) strongly encourages the application of criteria-based policies in conjunction with the use of Landscape Character Assessments. This approach allows the individual consideration of different areas, including their key local features and views enabling a better response to development proposals.</p> <p>The fact that the administrative area of Gloucester City is predominantly urban does not mean that the Landscape Character Assessment approach is not applicable. Kayterm considers that a similar methodology can appropriately be applied to townscapes and rural fringe locations through an 'Urban Characterisation Study' and suggests that the Council should seriously consider following this route which has already been successfully utilised in Cathedral cities such as Oxford and Ely.</p>		<p>Areas set out in the Development Control Policies DPD allows for appropriate forms of development provided certain criteria can be met. This is considered to be a reasonable and pragmatic approach. The LCAs have been drawn up on the basis of independent specialist landscape advice.</p> <p>No change.</p>
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Nature Conservation	Object	<p>Kayterm supports the protection of areas of ecological significance but agrees with the Council that the various existing designations must be carefully distinguished so as to avoid any confusion.</p>	<p>Suggest that future revisions of the document should ensure that the spatial definition of the different designations is beyond confusion.</p>	<p>Agree. The preferred option document is accompanied by a Proposals Map illustrating the extent of all policy designations.</p>

			Concerned that Appendix 2 is not sufficiently clear in distinguishing between SNCI's and SSSI's.		
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Sites of Nature Conservation Interest	Object	If these local designations are to be continued in the new LDF then they should incorporate appropriate levels of flexibility. Any SNCI policies should allow proposals for development to be considered upon their merits, including the remedial and enhancement measures that they offer.		Agree. It is considered that the policy approach towards development affecting a site of nature conservation interest is worded so as to allow for appropriate forms of development subject to proper mitigation. No further change is considered necessary.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Sites of Special Scientific Interest	Support	Kayterm recognises the importance of SSSI's and considers that the LDF should continue to include policies that include levels of protection for such areas in accordance with national guidance. However additional requirements that exceed national guidance are not necessary and would be more likely to cause confusion.		Support noted. The policy protection to be afforded to SSSIs under the LDF fully reflects national policy guidance and does not exceed it.
Jennifer Hainsworth for Barton Willmore Planning on behalf	Prime Biodiversity Areas	Support	Kayterm does not have any specific concerns and is content with the approach proposed in the		Support noted. The Prime Biodiversity Area is identified it the preferred

of Kayterm Plc			consultation document.		option draft document.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Robinswood Hill Country Park	Support	Kayterm agrees that Robinswood Hill should continue to be allocated as a protected area of open space and SNCI. However this designation only covers the western side of the hill, excluding the Golf Course. No changes to the designated area should be made unless full discussions have been undertaken and agreement reached with neighbouring landowners and occupiers.		Support noted. The designation has not been amended and reflects that previously identified through the Local Plan process.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Scheduled Ancient Woodland	Support	Note that the only SAW in Gloucester is at Matson Wood which is also a designated SNCI under the Draft Local Plan 2002.		Comment noted.
W W Strachan for RPS on behalf of Sylvanus Lyson's Charity	Landscape Conservation Area – Land off Hempsted Lane	Object	Object to the inclusion of this land as a Landscape Conservation Area. This land was also proposed for Landscape Conservation Area status during the preparation of the adopted Local Plan, and following objections from the Hempsted Landowners Consortium, was not considered by the Inspector to fulfil the Council's own criteria for the	The charity requests that the Hempsted LCA be deleted from the Issues and Options document. It is not justified and fails to fulfil the appropriate criteria.	Disagree. The landscape conservation areas have been drawn up based on specialist external advice provided by consultants. The boundaries as defined are considered to fully reflect the designation criteria. Government policy set

			<p>designation of such areas. Unfortunately the LCA designation was included in the current adopted Local Plan.</p> <p>In light of the previous Inspectors recommendations and because there has been no material change in circumstances affecting the intrinsic landscape quality of the area, is disappointed that it is proposed to continue this area as a Landscape Conservation Area.</p> <p>Authorities have been cautioned continuously by Government about the unjustified imposition of additional development control policies with the 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</p>		<p>out in PPS7 states that local landscape designations should be based on a formal and robust assessment of the qualities of the landscape concerned.</p> <p>Government advice also recognises that there are some areas outside nationally designated areas that are particularly highly valued locally and that local landscape designations should be retained where criteria based planning policies cannot provide the necessary protection.</p> <p>Amend text to provide further justification for the use of the LCA designation.</p>
W W Strachan for RPS on behalf of Sylvanus Lyson's Charity	Prime Biodiversity Areas	Object	Object to land off Hempsted Lane being identified as a Prime Biodiversity Area. It does not figure as a Site of Nature Conservation Interest of Site of Special Scientific Interest. The primary justification for the designation appears to be that the area is integrally associated with		Comments noted. Disagree. It is considered that the boundary shown is appropriate taking into account the nature of existing land uses and the likelihood of high levels of biodiversity. No change.

			<p>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, subject to significant trespass and unauthorised use as well as authorised grazing and in no reasonable terms could be concluded to be a Prime Biodiversity Area. While it is contended that in paragraph 4.24 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 aspects without adequate justification.</p>		
Hamiltons on behalf of J Davies Esq,	Landscape Conservation	Object	This land has no particular landscape significance.		Note that the principle of LCAs has been accepted

Newark Farm, Hempsted, Gloucester	Area – Land to the West of Hempsted Lane		Agree that the area immediately to the west of this site does contain historic earthworks and should retain its designation.		by the objector. The boundaries of the proposed Landscape Conservation Area have been drawn having regard to independent specialist advice in line with Government Policy.
Councillor Gordon Heath	Landscape and Nature Conservation	Support	The current designations should be retained.	Could a character-based assessment be worked in so that they hold each other up?	Comment noted. Regard will be had to the Gloucestershire Landscape Character Assessment where this is applicable.
Pat Roberts	Landscape	Support	Retain the current designations.		Support noted.
Pat Roberts	Prime Biodiversity Areas	Support	Protect Prime Biodiversity Areas.		Support noted.
Pat Roberts	Robinswood Hill Country Park	Support	This should continue to be allocated as a protected area of public open space.		Support noted.

Justin Milward on behalf of The Woodland Trust	Ancient Woodland	Object	<p>Pleased to see a reference to this document to Matson Wood, the last remaining area of ancient woodland within the City boundary, and recorded as a Site of Nature Conservation Importance in the Local Plan. However we are objecting because there is no clear policy of absolute protection for this irreplaceable habitat.</p> <p>More information and references to Government guidance provided.</p>		Comments noted. Specific reference to the protection of Ancient Woodland will be made in the submission version of Policy BNE1 set out in the Development Control Policies document.
Justin Milward on behalf of The Woodland Trust	Sites of Nature Conservation Interest (SNCI)	Object	<p>Whilst we are pleased to see paragraph 4.14 propose an approach to ensure that biodiversity is not only protected but also restored and enhanced wherever possible, we are concerned about the level of protection for irreplaceable habitats such as ancient woodland. Paragraphs 4.10 – 4.15 provide only qualified protection for SNCI's proposing that development need should be balanced against nature conservation importance. The only remaining piece of ancient woodland in Gloucester in Matson Wood is designated an SNCI but it not therefore, fully protected.</p>		Comments noted. Specific reference to the protection of Ancient Woodland will be made in the submission version of Policy BNE1 set out in the Development Control Policies document.

			Further information provided.		
Ceri Porter on behalf of the Environment Agency	Landscape	Support	<p>We agree that the use of designated landscape conservation areas is likely to be more effective in an urban area like Gloucester.</p> <p>The fact that the landscape sites tend to be larger and incorporate Sites of Nature Conservation Interest (SNCI's) reflects the way that the landscape functions ecologically. In other words the 'nesting' of smaller sites within wider areas alleviates some of the pressures on the smaller sites.</p> <p>It would however seem appropriate that any review or updating of these areas, landscape character assessments methodology is adapted in order to make them more defensible and robust.</p>		Support noted.
Ceri Porter on behalf of the Environment Agency	Sites of Nature Conservation Interest (SNCI), Paragraph 4.11	Object	<p>Measures to positively enhance and restore biodiversity need to be seen as additional to protecting areas. Whilst we agree that there are shortfalls to simply demarcating areas to be protected, Biodiversity Action Plan targets stand very little chance of being</p>		Comments noted. This issue will be reflected in the Core Strategy submission version.

			<p>achieved in urban areas unless they can build upon a comprehensive and meaningful network of protected sites.</p> <p>Other areas that have nature conservation value that should be identified include all the watercourses that flow through Gloucester. Sections of the existing watercourses are identified as SNCI's however as linear features it would make more sense of enhancing and restoring their biodiversity value if, the whole length of, for example, Horesbere Brooke was designated as a SNCI. We consider there are significant opportunities to carry out river restoration of watercourse SNCI's.</p> <p>Most of these watercourses have been severely degraded by land drainage works and the proximity of development. Nevertheless, Otters are now known to be potentially using all tributaries of the River Severn and one criteria for identifying local sites is the presence of protected species.</p> <p>Actions to restore the biodiversity of nature conservation sites should include a programme of action to improve the 'Newtscape' of Gloucester. Relatively recently,</p>		
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			Great Crested Newts have disappeared from a number of historic sites (in many cases directly due to building over ponds). As part of Gloucester, notably the Robinswood Hill area, have a cluster of records of newts their current status should be ascertained and their future better secured.		
Ceri Porter on behalf of the Environment Agency	Sites of Special Scientific Interest	Comment	One of the key issues affecting SSSI's is their isolation. If they are no longer in the context of farmland it is harder to effectively manage them agriculturally. When they are separated from similar features and habitats their value can be reduced and in the case of Hucclecote Meadows (where more adjacent development is planned), they are also vulnerable to increased recreational pressure. Development plan policies should seek to preserve an appropriate buffer around SSSI's.		Agree. Amend text to refer to the importance of linkages from SSSIs to surrounding habitats.
Ceri Porter on behalf of the Environment Agency	Prime Biodiversity Areas	Support	We agree that the undeveloped land along the River Severn should be a Prime Biodiversity Area. The shortfall in public open space provides greater support for		Support noted.

			multifunctional areas of landscape and nature conservation that should be left undeveloped.		
Ceri Porter on behalf of the Environment Agency	Robinswood Hill Country Park	Support	Agree that Robinswood Hill should continue to be allocated as a protected area of public open space and site of nature conservation importance.		Support noted.
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Landscape, Paragraphs 4.2 – 4.9	Support	<p>The County Council maintains its representations to the Gloucester Second Deposit Local Plan 2002 in respect of policies B.2, CS.9, and OS.7 (extracts provided).</p> <p>We agree with the use of landscape character assessments as a mechanism to provide a proper measure of the value and merits of particular sites.</p>		<p>PPS7 allows for the use of local designations provided they do not unduly restrict acceptable, sustainable development. The draft policy relating to Landscape Conservation Areas set out in the Development Control Policies DPD allows for appropriate forms of development provided certain criteria can be met. This is considered to be a reasonable and pragmatic approach.</p> <p>The LCAs have been drawn up on the basis of independent specialist landscape advice.</p>

<p>Nick Stewart on behalf of Gloucestershire County Council Resources Directorate</p>	<p>Sites of Nature Conservation Interest, Paragraphs 4.10 – 4.15</p>		<p>The County Council maintains its representations to the Gloucester Second Deposit Local Plan 2002 in respect of policies B.2, CS.9, and OS.7 (extracts provided).</p> <p>Agree that it is important to fairly and correctly identify important sites and to protect them from inappropriate development.</p> <p>However disagree with the inclusion on the Plan at Appendix 2 of all the County Council's land holding at Clearwater Drive (See comments under Community Provision).</p>		<p>Support noted. Land at Clearwater Drive is dealt with under a separate Development Brief.</p>
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Open Space and Recreation

- **Open Space**
- **Allotments**
- **Proposed Rowing Club Facility**
- **Other facilities or sites**

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Stephen Rose (Secretary of Gloucester Rowing Club)	Paragraphs 5.9 – 5.11, and 13.2 – 13.8)	Support	<p>The rowing club is still looking for a new site. We believe this site to be suitable for our needs and would be an appropriate development at the edge of the Cordon Sanitaire. We are not aware of any possible alternative sites.</p> <p>The development of this site would allow increased access to both recreational and competitive rowing for local people. The ‘do nothing’ option (sustainability appraisal paragraphs 5.13 – 5.14) would not necessarily maintain the status quo. The limitations of the current site, in particular the increasing pressure on local parking facilities, could make the club less attractive over the coming years.</p>		<p>Support noted. The proposed mixed-use allocation of land at Netheridge includes provision for a new rowing club for Gloucester.</p> <p>Increasing participation in healthy activities is a strategic objective of the Council’s Core Strategy.</p>

Arthur Daley	Open Space	Support	The Plan should increase the amount of space allocated for leisure with a greater amount of planting of trees within areas allocated for housing and industry.		Relevant policies within the LDF seek to ensure the provision of new public open space as part of new development. The existing shortfall of public open space in the City is recognised and the required public open space standard will help to redress this shortage.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Open Space and Recreation	Support	Agree with the designated areas but would like to see rules made to ensure that future provision for open space is not eroded during actual build. This happened in Quedgeley and there is now very little open space for the public.		Comment noted. The provision of public open space as part of new development will be secured through a Section 106 legal agreement. This is binding.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Proposed Rowing Club Facility	Support	This seems a reasonable proposal.		Support noted. The proposed mixed-use allocation of land at Netheridge includes provision for a new rowing club for Gloucester. Increasing participation in healthy activities is a

					strategic objective of the Council's Core Strategy.
Helen Lancaster on behalf of English Nature	Open Space and Recreation	Comment	Please see comments made in letter of 20 th May 2005.		See previous response.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Open Space and Recreation	Support	Kayterm supports the Council in their approach to protecting existing areas of public open space and allotments as identified in Appendix 4.		Support noted.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Proposed Rowing Club Facility	Support	No concerns relating to the proposed new rowing club facility as identified at Appendix 5.		Support noted. The proposed mixed-use allocation of land at Netheridge includes provision for a new rowing club for Gloucester. Increasing participation in healthy activities is a strategic objective of the Council's Core Strategy.
Miss A C Balchin	Open Space	Object	The Plan at Appendix 4 includes as open space an area of land off Needham Avenue. This has been closed to the public for nearly ten years.		The City Council supports the re-use of open space that may have been closed to the public. As such it is considered appropriate to identify this

					site as public open space.
Miss A C Balchin	Open Space	Object	<p>The Plan at Appendix 4 fails to include as public open space:</p> <ul style="list-style-type: none"> • Land off Simms Lane (which is also a site of Nature Conservation Interest and identified in Appendix 2) • The Canalside Walk and associated footpath links • The Dimore Playing Fields • The new playing fields south of Naas Lane • Land at Squirrel Close • The Moat (which is also included as a Scheduled Ancient Monument) 		The Council's leisure team will advise on the potential allocation of these sites as public open space prior to submission of the final draft proposals map in March 2007.
Miss A C Balchin	Open Space	Comment	<p>If the LDF continues the policy of designating Landscape Conservation Areas, the public open space along the Dimore Brook from Overbrook Road to the canal should be included as it is an area of land, which serves to separate the built development of Quedgeley and Hardwicke, and creates a green lung that makes an invaluable contribution to the local environment.</p>		<p>Comment noted. The boundaries of the LCAs have been drawn up on the basis of independent specialist advice. It is not considered appropriate to amend the boundaries without a full review being undertaken. This will be carried out in the future and any necessary amendments made in future iterations of the LDF.</p>

Miss A C Balchin	Open Space	Comment	The only remaining opportunity to redress the severe shortfall in recreational facilities and open space for the area between the A38 and the Canal is the land at Clearwater Drive. Whilst a new Primary School in this location is an even greater priority, if this should not happen during the future then the entirety of the land should be made available for sports provision, recreational facilities and public open space generally.		Agree in part. This site provides the opportunity to secure a significant proportion of public open space as part of a limited residential development. Land at Clearwater Drive is the subject of a separate development brief.
Councillor Gordon Heath	Open Space and Recreation	Support	Agree with the sites identified.	Could we include the area of the west side of the river between the new northern section of the bypass and Quay Street?	Support noted.
Councillor Gordon Heath	Allotments	Object		The two allotments in Hempsted are not shown on the map.	Amend map accordingly.
Councillor Gordon Heath	Rowing Club Facility	Support	Support this fully.		Support noted. The proposed mixed-use allocation of land at Netheridge includes provision for a new rowing club for

					<p>Gloucester.</p> <p>Increasing participation in healthy activities is a strategic objective of the Council's Core Strategy.</p>
Pat Roberts	Open Space and Recreation	Support	<p>Agree strongly with the protection and open space and recreation. Allotments are an undeveloped resource here.</p>		Support noted.
Justin Milward on behalf of The Woodland Trust	Open Space and Recreation	Object	<p>Object because would like to see the document utilise the findings of the Woodland Trust's Woodland Access Standard.</p> <p>Further information provided.</p>		<p>This issue will be dealt with in the Core Strategy. No change.</p>
Ceri Porter on behalf of the Environment Agency	Open Space	Support	<p>The shortfall in public open space provides even more reason to preserve the existing green spaces and corridors, be they designed for landscape nature conservation or public open space.</p> <p>The opportunities to enhance the nature conservation value of public open space should be reviewed.</p>		<p>Support noted. A review of potential sites of nature conservation importance has been undertaken as part of the evidence base underpinning the Local Development Framework.</p>
Nick Stewart on	Rowing Club,	Support	We support the location of a new		Support noted. The

behalf of Gloucestershire County Council Resources Directorate	Paragraphs 5.9 – 5.11		rowing club facility at the location on Appendix 5.		<p>proposed mixed-use allocation of land at Netheridge includes provision for a new rowing club for Gloucester.</p> <p>Increasing participation in healthy activities is a strategic objective of the Council's Core Strategy.</p>
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HOUSING

General Comment

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Housing	Comment	In allocating land for housing we would agree that brownfield sites are used first before any greenfield sites are considered. In calculating housing need the Council should consider the number of windfall sites that become available. On average, according to planning applications viewed on the web, 250 units of accommodation become available each month. If all completed this would yield 3,600 units per year.	Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	<p>Disagree. The City's housing requirement is determined through the Regional Spatial Strategy. This indicates that 575 dwellings per year should be provided up to 2026.</p> <p>Government guidance set out in PPS3 states that windfall development should not be relied on in</p>

					<p>meeting housing requirements.</p> <p>Furthermore, the annual average completion of new housing over the past 5 years has been between 500 and 600 dwellings per year.</p> <p>No change.</p>
<p>Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College</p>	Housing	Object	<p>The allocation of sites should not be based on historic housing levels but on predicted levels set by the Regional Spatial Strategy. Sufficient sites should be allocated with no differentiation between previously developed and greenfield sites. The authority should have regard to their sustainability appraisal when allocating sites with the priority for development being <u>developable</u> brownfield land.</p>	<p>Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College</p>	<p>Agree. The housing requirement of the LDF is informed directly by the Regional Spatial Strategy submission draft.</p> <p>In line with Government policy, our priority is for previously developed land that is available.</p> <p>This is reflected in our selection of preferred housing site allocations.</p> <p>No change.</p>
<p>Andrew Jones for the Barton Willmore Planning Partnership on</p>	Housing – Paragraph 6.2	Object	<p>Object to the assumption in paragraph 6.2 that the Council has an oversupply of potential housing development in the period to 2011.</p>	<p>Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and</p>	<p>Agree. Delete sentence and replace with reference to the housing requirement of the draft</p>

behalf of Taylor Woodrow Strategic Developments and Brasenose College			This has been established by or conform with emerging Regional Guidance.	Brasenose College	Regional Spatial Strategy.
Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College	Housing – Paragraph 6.6	Object	Object to paragraph 6.6 as there is no evidence that all brownfield sites identified in the city centre are available and practical for development. In order to clarify this statement, each site will need to pass the sustainability and availability test to meet LDF procedure and ensure conformity with national guidance.	Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College	Agree in part. Amend text to emphasise that the priority is available previously developed land. The selection of preferred housing sites is based on the RSS housing requirement and the tests set out in PPS3 concerning availability etc.
Peter Wray on behalf of the Highways Agency	Housing	Support	Support the policy of allocating housing within the central area. Will withhold any judgement on any proposed sites until further information is available.	Peter Wray on behalf of the Highways Agency	Support noted. The regeneration of the Central Area is consistent with advice set out in the Regional Spatial Strategy.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Housing – Paragraph 6.3	Support	Support inclusion of paragraph 6.7 which noted that not all new housing development can be accommodated in the central area and other sites in suitable locations	Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Support noted.

			across the rest of the city need to be allocated.		
Government Office for the South West	Housing	Object	This section may be a little misleading as it focuses heavily on the adopted Structure Plan. It should ideally make reference to the likelihood that Gloucester will require more housing than identified in the adopted Structure Plan, based on evidence from the Third Alteration EIP, emerging JSA and RSS work.		Agree. Update text to refer to the housing requirement set out in the submission Regional Spatial Strategy.
Graham J Parkes for Tweedale on behalf of IM Properties Plc	IM Group Site	Object	<p>It is acknowledged that the rail freight terminal is unlikely to come forward. As such, it was agreed at the time of the inquiry into the RAF Quedgeley proposals that, should this facility not progress, the alternative use for that land should revert to that which was originally intended which was residential.</p> <p>If, as it seems increasingly likely, there will be additional residential development adjoining the northern boundary of our clients operational area, there is likely to be an impact upon the amenity of the occupiers within the new residential area. By virtue that there is no restriction by condition upon the planning</p>		<p>Comments noted. Having regard to the potential surplus of housing land availability, it is considered appropriate to retain this site as an employment allocation.</p> <p>No change.</p>

			<p>permission for the use of the vehicle distribution centre, it is permitted to operate 24 hours a day which may be inappropriate for the nearest housing.</p> <p>Our clients are currently considering their available options as to how they might be able to expand their existing operations within this general area as they have an additional area of land, immediately to the south of Naas Lane which could be utilised. However with their existing site, and this additional land which is proposed to be allocated for employment use in the LDF, there still may not be sufficient land for them to expand their operations as much as they would hope. They may therefore be forced to look elsewhere, perhaps outside the City, to accommodate their aspirations for their business.</p> <p>As such, and given what is understood is likely to be happening within the RAF Quedgeley redevelopment site, it is considered that further consideration should also be given to our Clients existing site to the north of Naas Lane as a potential alternative 'windfall' housing site.</p>		
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			<p>The recent change in national planning policy guidance with the inclusion of paragraph 42(a) of PPG 3, Housing, provides encouragement for the re-use of employment land for alternative uses , where it is no longer required for the original purpose.</p> <p>Our clients site comprises previously development land within the urban area which PPG 3 states as being the most appropriate location for new residential development. Given that this site would be surrounded by along its adjoining boundaries by other residential development, and for the protection of residential amenity in those areas, the City Council should give further consideration to the allocation of the land to the north of Naas Lane for residential development in the LDF.</p>		
Pat Roberts	Static Caravan Park	Support	Agree that these static caravan sites should be protected from other forms of development.		Support noted.
Ian Manning, Managing Director, Stagecoach West	Housing	Support	In general terms we support the development of housing where it infills existing development, existing development along the		Support noted. Public transport improvements will be considered as part of new development

			route of core services where we are able to provide good quality public transport at first occupation of the properties or where section 106 agreements permit the adoption or creation of worthwhile facilities at good frequencies such as have been designed for RAF Brockworth.		proposals where appropriate.
Ceri Porter on behalf of the Environment Agency	General Allocation Issues	Comment	Any new housing allocations need to incorporate and enhance existing ecological and landscape features including infrastructure such as watercourses, field boundaries, and existing natural topography.		Agree. Where there are known features of interest, this is reflected in the preferred site allocation policy. No change.
Ceri Porter on behalf of the Environment Agency	General Information	Comment	Comments on suggested housing allocations have been made having PPS 1 and 23 and PPG 1. Further information has been provided.		Comments noted. Individual comments for each allocation have been included in the document.
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	General Comment	Comment	In relation to all residential development, appropriate, related, and justifiable contributions should be made towards infrastructure by way of planning obligations. The County Council has a statutory authority for children's and adult services, environment, community		Agree. The City Council will consult the County Council in relation to potential contributions towards infrastructure from new development where appropriate.

			and resources and is responsible for ensuring that proper contributions are made towards services such as early years, primary and secondary education, child and adult social care, libraries, arts and museums, fire and rescue, highways, transportation and waste. The County Council shall be consulted about all relevant development to secure a proper and full infrastructure.		Under each preferred site allocation the policy specifies likely requirements to provide certainty. No change.
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Existing Allocations

- Land at the Hospital – Great Western Road
- Bus Depot, London Road
- Part of Oil Storage Depot, Hempsted Lane
- Kingsholm Rugby Club

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Mark J Aplin	Existing Allocations	Support	Support approach to remaining draft allocations.		Support noted.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Existing Allocations	Comment	The Council should carefully consider the reasons why these sites have not yet come forward for development. If there are		Agree in part. The allocations have been revised in light of comments received and

			<p>significant obstacles to developing the three proposed sites then they should not be carried forward to the LDF.</p> <p>The Council should consider deliverability as an important factor when assessing new housing allocations for the LDF period.</p>		<p>land at the Hospital and the Bus Depot are no longer proposed to be allocated for housing development.</p> <p>The other allocations are considered to be deliverable although the Kingsholm site is dependent on any future relocation of the rugby club.</p>
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Existing Allocations – Kingsholm Rugby Ground	Support	Agree that this site should not be carried forward as an allocation in the LDF.		<p>Comment noted, however the potential development of a new community stadium at the railway triangle may lead to the Kingsholm site becoming available for redevelopment. The site lends itself to residential development given its location and the nature of surrounding uses.</p> <p>The Kingsholm site has therefore been allocated for residential development.</p>
Government Office	Existing	Comment		Could you state here why	The preferred option

for the South West	Allocations			these sites are still considered appropriate?	document sets out the reasoned justification for the allocation of each site including an assessment of alternatives that have been considered.
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Existing Allocations – Land at the Hospital, Great Western Road	Object	<p>Object to this site being retained as a housing allocation under the LDF and believe this site is more suited to accommodating an employment or other commercial use.</p> <p>The site is almost completely surrounded by other hospital buildings and is not appropriate for residential development. There are significant amenity issues regarding noise and odours from the hospital, which were apparent on visiting the site. The standard of residential amenity on this site would therefore be inappropriate.</p> <p>To the south of the site, on the opposite side of Great Western Road, there are a number of industrial warehouses and a large area of parking for Gloucester Railway Station. It is therefore considered that an employment use would be better suited to this site in terms of its compatibility with surrounding land uses, as opposed to residential development. The</p>		Agree in part. This allocation has been deleted in light of comments received at the Issues and Options stage.

			hospital buildings themselves would also be able to lend themselves to conversion for accommodating office units rather than residential units.		
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Existing Allocations – Bus Depot, London Road	Object	<p>Propose that this site is more suited to a mixed-use scheme of residential and retail uses rather than purely a residential scheme, due to its location on one of the main routes into the City Centre.</p> <p>This area of London Road has a number of ground floor retail units with residential flats in the upper storeys of the terraces, with a range of retailers opposite the bus depot and further along London Road resulting in a busy street scene. We consider that it is important for an active commercial frontage on this street to be encouraged and enhanced.</p>		<p>Representations received at the Issues and Options stage suggest that this site is unlikely to become available in the short-term. For this reason the draft allocation has been deleted.</p> <p>If the site were to come forward speculatively it would be considered on its merits as a windfall site.</p> <p>If no development has come forward, the site will be reconsidered through a review of the Local Development Framework.</p>
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Existing Allocations – Part of Oil Storage Depot, Hempsted Lane	Object	<p>We do not think that this site is suitable for housing and believe that an employment use should be retained on the site.</p> <p>The land to the north-east of the</p>		<p>Disagree. It is considered that the site is suited to limited residential development. The existing employment uses on site are</p>

			<p>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>While the locating of residential uses to the east of the site could be argued as a natural extension of the residential area on Hempsted Lane, due to the extensive size of the depot, once part of this site is developed, the whole site will then be under pressure for further development and the entire employment site could be lost.</p> <p>In addition to concerns regarding the defensibility of the boundaries of this site, there are also issues regarding the ground conditions of this site, although the site is only at risk of 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>negligible and provide few job opportunities.</p> <p>Any development proposal would need to be supported by an appropriate programme of decontamination measures that make the land suitable for residential use.</p>
Nathaniel Lichfield	Existing	Object	Due to the current status of the		Comment noted, however

<p>and Partners for Cavanna Homes (South West) Limited</p>	<p>Allocations – Kingsholm Rugby Ground</p>		<p>site, with the rugby ground no longer planning to relocate in the near future, we agree that this site should not be carried forward as a housing allocation in the LDF. The exclusion of this site therefore results in the loss of an indicative capacity for 100 dwellings, which will need to be identified in an alternative location.</p>		<p>the potential development of a new community stadium at the railway triangle may lead to the Kingsholm site becoming available for redevelopment. The site lends itself to residential development given its location and the nature of surrounding uses.</p> <p>The Kingsholm site has therefore been allocated for residential development.</p>
<p>Patrick Downes for Harris Lamb Chartered Surveyors on behalf of Bovale Limited</p>	<p>Existing Housing Allocation – Part of Oil Storage Depot, Hempsted Lane</p>	<p>Support</p>	<p>Support the proposal set out in the document for land at Hempsted Lane (paragraph 6.8, appendix 6).</p> <p>However the representation seeks an extension of the potential development area (location plan attached). We believe the area is capable of accommodating approximately 170 units.</p> <p>The proposed allocation does not take up the entirety of the site because we believe that part of the site should be allocated for open space and amenity purposes in conjunction with the adjoining housing proposal.</p>		<p>The construction of 170 units across a wider site area is likely to have a significant detrimental impact in landscape terms.</p> <p>It is considered appropriate to retain the existing allocation of 30 dwellings.</p>

			<p>The following sustainability issues have been considered:</p> <ul style="list-style-type: none">• The site is well located, being a brownfield site adjoining existing urban uses• Hempsted Lane is well served by local bus services providing accessibility to the remainder of Hempsted Village, the City Centre of Gloucester and other recreation leisure and employment areas of the city• Hempsted Village already contains a variety of facilities including schools, church, meeting halls, local shops and open space• Employment is close by on the industrial estates between Hempsted Village and the City Centre• Development has been appropriately sited so as to respect the setting of Newark House adjoining the site <p>We recognise that in bringing forward a development proposal on</p>		
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			<p>this site it would be appropriate to provide a mix of dwelling types including starter homes as well as a range of family accommodation.</p> <p>The development can be integrated into the existing landforms and will provide high quality design which will be integrated with new amenity areas for the benefit of both existing and new residents of Hempsted.</p> <p>Details of discussions with the Council to date have been provided.</p>		
Ian Manning, Managing Director, Stagecoach West	Existing housing allocation – Bus Station, London Road	Comment	The company has not found a suitable alternative site to its London Road depot, where it would be possible to relocate at an appropriate cost and there are no active plans at the moment to seek an alternative unless a new garage were to present itself at a potential location like the proposed park and ride site at Elmbridge Court.		<p>Comment noted. The allocation has been deleted. If the site does become available, it will be dealt with either as a windfall housing site or through a subsequent review of the Local Development Framework.</p> <p>Delete allocation.</p>
Ceri Porter on behalf of the Environment Agency	Existing Housing Allocations	Support	In principle we consider these to be acceptable. Given their site histories, we would recommend that a site investigation be carried		Comment noted. The comments of the Council's contaminated land officer have been

			<p>out as a minimum before determination of any planning application for the Bus Depot and Oil Storage Depot sites.</p> <p>The site at Hempsted Lane is located on made ground therefore any surface water discharge to the Newark Brooke would require treatment.</p> <p>Land at the hospital would require a desk study for potential contamination prior to determination.</p>		<p>incorporated into the preferred option document.</p> <p>Amend text accordingly.</p> <p>The bus depot and hospital sites have been deleted.</p>
Ceri Porter on behalf of the Environment Agency	Kingsholm Rugby Club	Support	<p>Agree with the removal of Kingsholm Rugby Club from the housing allocation given the potential flood risk at the site.</p>		<p>Comment noted, however the potential development of a new community stadium at the railway triangle may lead to the Kingsholm site becoming available for redevelopment. The site lends itself to residential development given its location and the nature of surrounding uses.</p> <p>The Kingsholm site has therefore been allocated for residential development.</p> <p>Any application would</p>

					need to be supported by a Flood Risk Assessment. This requirement is reflected in the text of the policy.
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Land at Frogcastle Farm, Sandhurst Lane (suggested for housing)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Mrs E A Baldwin	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	Totally opposed to the proposed housing development on this site.		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Helga Howes	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	This site is a flood meadow. It floods regularly and occasionally overflows into Sandhurst Lane, flooding and closing the lane. Any build-up of this site would		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and

			increase the level of flooding in Sandhurst Lane and endanger existing housing.		having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mr C N R Major	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>If a proposed development were to go ahead the unique appeal of my home would be lost (being so close to the countryside and City). This amongst other things would devalue the property.</p> <p>Surely the fact the area floods so frequently makes the land unsuitable. It is also a designated Landscape Conservation Area.</p>		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mr Robert Granger	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	Strongly object to the use of this land as the area is well known for flooding. Building houses on this land would create an additional barrier causing the flooding of much larger areas and considerable compensation claims against the City Council.		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is

					not needed at this stage.
Mr and Mrs C J Hignell	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Sandhurst Lane is already subject to flooding which would intensify with any building. It would impede the flow of flood water.</p> <p>Traffic congestion is already a problem with the cattle market site becoming operational.</p> <p>No building should ever be allowed on this flood plain, which is also a wildlife haven.</p>		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mrs P E Gough	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	Strongly object to the use of this land for housing, owing to the flood situation. The site floods regularly in winter, and therefore the building of houses would entail the raising of the land level. This would create a barrier, causing flooding to Rivermead Close and across to Tewkesbury Road and Longford.		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mr Michael Gough	Frogcastle Farm,	Object	As recently as December 2000 this land was under 3 foot of water –		Objection noted. This site has not been identified as

	Sandhurst Lane, Gloucester		<p>therefore to develop this site the land would need to be infilled. If this happened, not only would my property be flooded during any flood similar to that of 2000 or 1947, but also the properties in Rivermead Close and much of the Tewkesbury Road Area.</p> <p>You cannot continue to develop land within the floodplain without having serious repercussions to existing properties.</p>		<p>a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>
Bob Newby	Frogcastle Farm, Sandhurst Lane, Gloucester	Support	<p>It would be sensible, if solely on the platform of safety that some consideration is given to widening and straightening the stretch of Sandhurst Lane from the A40 Northern Bypass bridge to the Junction with Sandhurst Road.</p> <p>At the moment it is impossible for a car and a car to pass each other without one mounting the footpath.</p> <p>The granting of licenses for businesses using large lorries and HGV's further down Sandhurst Lane has exacerbated this problem and it is only a matter of time until someone is killed.</p> <p>Other than this minor reservation I am wholly in support of this</p>		<p>Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>

			proposal as would similarly like to develop a small parcel of adjoining land that Tewkesbury Borough Council is obstructing.		
Mrs A Scott	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object to the proposal to develop land at Frogcastle Farm on grounds of flooding.</p> <p>Also object on traffic grounds as Sandhurst Lane is not suitable for an additional 300 cars.</p> <p>It is also a local Conservation Area and a greenfield site.</p>		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
J V Mayer	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object to the land being developed on the following grounds:</p> <ul style="list-style-type: none"> The land is in the flood plain of the River Severn and has flooded on many occasions since 1973. By providing an area of expansion for the floodwater the land assists in protecting the existing housing in Sanhurst Lane, Rivermead Close and the adjacent roads up to the 		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.

			<p>northern bypass. From information provided on a visit to the River Severn/Gloucester area test model at Wallingford some years ago, it would seem that further impediment to the flood plain would only serve to prejudice the security of existing housing to the north of the city.</p> <ul style="list-style-type: none">• In order for the land to be developed, it would require either massive in-fill to raise the ground above current or projected flood levels, or embankments which would themselves create access problems during periods of flooding. Either of these would jeopardise the housing quoted above by funnelling floodwater down the dead end land separating Sandhurst Lane from Rivermead Close and the developed area up to the northern bypass.• It would cause problems with regard to access. The access to/from Sandhurst Road/Lane onto/from St Oswalds Road is already		
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			<p>less than ideal. The traffic on St Oswalds Road is set to grow with the expanding development of the business park let alone from the proposed housing development to the rear. It is difficult to see how any more vehicles could be safely routes onto St Oswalds Road from yet further development of the Frogcastle Farm land.</p>		
E N Burston	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Feel this land is unsuitable for development for the following reasons:</p> <ul style="list-style-type: none"> • The land consists of mainly flood meadow and during the last twenty years there has been flood water on the land almost every year. In bad years Sandhurst Lane has been flooded in the Frogcastle Farm area. • Should any development take place to include an exit onto Sandhurst Lane there would be an unacceptable increase in traffic trying to emerge onto St Oswalds Road at the junction by the 		<p>Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>

			<p>Gloucestershire club. Delays already occur at this junction every week day and the situation is getting worse due to the additional traffic generated following the development of the old Cattle Market. As development continues traffic will further increase.</p> <ul style="list-style-type: none">• Any thought of traffic emerging from the proposed site onto Sandhurst Lane and proceeding to reach the A38at Twigworth (to avoid congestion outlined above) as not only would it make the journey two miles longer but Sandhurst Lane is a country lane and not at all suitable for country traffic. To alter this lane to accommodate extra traffic would be a huge operation resulting in great expense.• The property was purchased mainly because of the green aspect across Sandhurst Lane and would not therefore like to lose the view.• Development in this area would have a serious affect on the local wildlife.		
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Mr R E Lane	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Strongly object to this land being developed for the following reasons:</p> <ul style="list-style-type: none"> • This area floods every year and is a flood plain for Gloucester. It is a green area and should not be built on now or during the future. • Sandhurst Lane will be unable to cope with the extra traffic. • If it is built on where will the floodwater go? • The St Oswalds Park development has already raised the area and the floodwater which was behind it has nowhere to go except across Sandhurst Lane. • Can the sewerage system together with the rainwater cope? • The South West Bypass could have an effect in this area. 		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mr A Manley	Frogcastle Farm, Sandhurst	Object	Object to houses being built on the floodplain – when flooding occurs it is relatively widespread.		Objection noted. This site has not been identified as a preferred option due to

	Lane, Gloucester				objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Alastair Goldie	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object to the proposal to develop land at Frogcastle Farm on the grounds that it is in the floodplain as defined by the Environment Agency.</p> <p>Government policy and City Council Policy is not to build on the floodplain and this site is well within it. Any infill on this site would adversely affect third parties which is also contrary to City policy.</p> <p>Also object on traffic grounds as Sandhurst Lane is not suitable for an additional 800 cars if 400 houses were to be built.</p> <p>It is also a designated Local Conservation Area.</p>		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.

<p>Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)</p>	<p>Frogcastle Farm, Sandhurst Lane, Gloucester</p>	<p>Object</p>	<p>Object to the proposal to develop land at Frogcastle Farm on the grounds that it is in the floodplain as defined by the Environment Agency.</p> <p>Government policy and City Council Policy is not to build on the floodplain and this site is well within it. Any infill on this site would adversely affect third parties which is also contrary to City policy.</p> <p>Also object on traffic grounds as Sandhurst Lane is not suitable for an additional 800 cars if 400 houses were to be built.</p> <p>It is also a designated Local Conservation Area.</p>		<p>Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>
<p>R C King</p>	<p>Frogcastle Farm, Sandhurst Lane, Gloucester</p>	<p>Object</p>	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> To build on the area would require the area to be built up. Assurances would be required that, due to the redistribution of flood waters, the Local Authority would take full responsibility for any increased dangers to flooding. 		<p>Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>

			<ul style="list-style-type: none"> Due to the recent Cattle Market development, increased traffic in the area is a major problem that can only be aggravated by housing. Any development plans must address this problem. 		
Miss J D Stott	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> The fields in Sandhurst Lane are part of Gloucester's floodplain and should not be drained. It may be poor quality agricultural land but it is still useful for grazing by horses and cows – also the production of agricultural feed – lately maize. There will be more pollution, more cars, more noise, and more use of dwindling resources. Gloucester needs more natural spaces to encourage species to flourish. 		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Gary Toomer	Frogcastle Farm,	Object	Object on the following grounds:		Objection noted. This site has not been identified as

	Sandhurst Lane, Gloucester		<ul style="list-style-type: none"> • Raising the levels of the floodplain is likely to subject existing dwellings to flooding in the future. • There are currently a number of brownfield sites that are still available for development • Sandhurst Lane is a very narrow country lane, already carrying a significant amount of agricultural traffic and HGV's. It is not suitable to accommodate any additional traffic that any new housing will generate. 		a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mr A E Denby	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • Frogcastle Farm is in the River Severn Floodplain – Government has proposed no further development in floodplain areas owing to recent flooding of new housing built on these unsuitable sites. • Suggested there is a local authority recorded landfill site – possibility of contaminated material. <p>Appreciate further details regarding</p>		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.

			proposed road layout and density of housing.		
Paul Barnes	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	Object on the following grounds: <ul style="list-style-type: none"> • The site is greenbelt • The land is flood release plain • The development would increase traffic jams 		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mike Dancey	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	Object on the following grounds: <ul style="list-style-type: none"> • The land is very prone to flooding – there has been much flooding during recent years. 		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
M Guilding, Jean	Frogcastle	Object	Object on the following grounds:		Objection noted. This site

Guiding	Farm, Sandhurst Lane, Gloucester		<ul style="list-style-type: none"> • The land has flooded regularly • Sandhurst Lane is totally unsuitable for any increase in traffic • It would depreciate the value of existing houses • It would increase insurance premiums <p>Please provide more details.</p>		has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Miss K Chandler	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • Use of a greenfield site • Would destroy wildlife • Would cause more traffic and congestion problems • The site is a flood plain 		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mark J Aplin	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object to the inclusion of possible housing at this stage.</p> <ul style="list-style-type: none"> • It is at least premature. Phasing must ensure brownfield sites are 		Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and

			<p>developed and there is no incentive at all for investors to hold out for the possibility of greenfield sites.</p> <ul style="list-style-type: none"> Whatever happens, the long-run possibility of maintaining a 'green corridor' down from the city boundary to reach to and beyond St Oswalds way should be investigated. 		<p>having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>
Mr A G E and Mrs P Pearce	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> The land has been subject to severe flooding Sandhurst Lane is not suitable for further traffic Traffic has already increased because of the recent opening of St Oswalds Park 		<p>Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>
D Ravenscroft	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> It is a greenfield site It is a floodplain Sandhurst Lane is very narrow and would not be 		<p>Objection noted. This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and</p>

			able to cope with any more traffic		having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College	Frogcastle Farm, Sandhurst Lane, Gloucester	Support	<p>Fully support the recognition that land at Frogcastle Farm is a potentially very sustainable site for housing and associated development.</p> <p>The scale of the development at this site will enable significant opportunities in affordable housing and potential new access routes to alleviate traffic congestion. The Frogcastle Farm site is the only greenfield site that can offer these benefits to existing and future residents as well as benefits to local amenity.</p> <p>The site is sustainably located in terms of the relationship to existing employment, local services, and public transport routes.</p> <p>The planning history of the site and potential flooding issues has meant that significant investigation has been undertaken including recent discussions with the environment</p>		<p>This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p> <p>No change.</p>

			<p>agency. Our clients are therefore confident that issues of potential flooding affecting the site can be resolved through appropriate compensation and mitigation works and does not represent a barrier to residential development.</p> <p>With regard to the sites location within a Landscape Conservation Area it is incumbent upon the Council to review landscape designations applying to potential housing sites in order to deliver sustainable development. Quote paragraph 24 of PPS 7.</p> <p>With regard to nature conservation interests – with specialist advice and surveys it will be possible to identify appropriate design solutions in order to address this issue.</p>		
Peter Wray on behalf of the Highways Agency	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	This is in close proximity to the A40T. Concerned about any detrimental effects on the safety of the A40 within the vicinity of the site. Therefore object due to its close proximity to the Trunk Road Network.		This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which

					suggest that this site is not needed at this stage.
Occupier at 4 Rivermead Close, Sandhurst Lane, Gloucester	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • The land is in the floodplain and floods regularly. What would be the affects on future flooding in the area? • The development would further strain on traffic problems in the area in the area of St Oswalds Business Park. • Would place an added strain on hospital, doctors, and post office services. 		This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mr A F Goddard	Frogcastle Farm, Sandhurst Lane, Gloucester	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • The land floods ever year and development would only exacerbate this • Sandhurst Lane would struggle to cope with the extra traffic 		This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.

Janet Wills	Frogcastle Farm, Sandhurst Lane, Gloucester	Strongly Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> The site floods regularly. Concerned of the consequences from the recent St Oswald's Park development and housing soon to be built behind it. 		<p>This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>
Government Office for the South West	Frogcastle Farm	Comment	<p>Why did the Community Forum object strongly to this site?</p>		<p>The Community Forum objected on the grounds of flood risk, loss of greenfield land and traffic impact.</p> <p>This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>

Pat Roberts	Frogcastle Farm	Object	Object to the principle of using this site for housing.		This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Mr Douglas Ware on behalf of Gambier Parry Gardens Residents Associations	Frogcastle Farm	Object	<p>Why is it considered wise to build on the floodplain around Frogcastle Farm?</p> <p>In all development plans no thought appears to be given to the movement of vehicles around the whole area. No new roads are planned to take what must be expected to be a huge increase in traffic. Roads around the area are very busy and this will be exacerbated once houses are erected as proposed.</p> <p>Whilst appreciating the cost surely any building in this area (including B&Q) must have access to and from the northern bypass.</p>		This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.

<p>Suzy Birdseye on behalf of Hallam Land Management</p>	<p>Frogcastle Farm</p>	<p>Object</p>	<p>This area lies in the floodplain and it would irresponsible to permit development to take place. Extract from draft PPS 25 provided.</p>		<p>This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>
<p>John Rhodes</p>	<p>Frogcastle Farm – Paragraph 10.1</p>	<p>Object</p>	<p>Despite what is said in paragraph 10.1, the plan published in Appendix 10 and taken from the Deposit Draft Local Plan indicates only a fraction of the more than 200 dwellings and business premises in inner Gloucester that were flooded by the Severn in 1947 (Gloucester Record Office file GBR/L6/23/B3733) and are still standing or been rebuilt below the level of 10.93m AOD reached by that flood.</p> <p>The boundary of the River Severn floodplain was published a year ago in the Environment Agency's Definitive Floodplain Map (copy provided). This is the area which lies below the 11.18m AOD level</p>		<p>This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>

			which the Agency now expects to be reached by a 1 in 100 year flood.		
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Frogcastle Farm, Sandhurst Lane	Object	<p>There are numerous issues regarding the unsuitability of land for housing. The majority of the site is located within the defined floodplain. In addition, part of the site is designated as a Landscape Conservation Area and there is also some nature conservation interest on the site.</p> <p>As well as the environmental concerns regarding the site, there is no clear defensible boundary. If the Frogcastle Farm site is developed, greenfield land continuing to the north of the site leading all the way up to the A40 will be vulnerable to future development pressures as presently no other defensible boundary exists for the site. We do not consider it appropriate to rely on the arbitrary boundary as proposed.</p> <p>We note that there have already been objections made regarding the potential development of this site, particularly in terms of the relevant environmental issues.</p>		This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.

			We therefore consider that this site should remain undeveloped and preserved for both the nature conservation importance of the site and the potential for exacerbating the risks of flooding.		
Ceri Porter on behalf of the Environment Agency	Frogcastle Farm, Sandhurst Lane	Object	<p>Most of this site is located within Flood Zones 2 and 3. This is undeveloped land and Table 1 of PPG 25 identified these areas as unsuitable for development unless exceptional. We therefore agree with the Council's Community Forum objection to the proposed allocation and strongly recommend that this site is not included within the Local Development Framework.</p> <p>Further, there is nature conservation interest throughout the site in terms of the network of ditches, field boundaries and ponds. We would be likely to object to significant development on this site.</p>		This site has not been identified as a preferred option due to objections raised by the Environment Agency concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.
Paul A Boileau on behalf of Brookbanks Consulting	Frogcastle Farm, Sandhurst Lane	Object	Matters of flood risk and development planning are covered in Planning Policy Guidance Note 25: Development and Flood Risk. This document advises that flood		This site has not been identified as a preferred option due to objections raised by the Environment Agency

			<p>matters should be considered at all stages of the planning and development process in order to reduce future damage to property and loss of life. It sets out the importance the Government attaches to the management and reduction of flood risk in the land-use planning process and advocates the Precautionary Principle in directing development towards sites where flood risk is thoroughly understood and within acceptable parameters.</p> <p>The emerging PPS 25, which is currently in consultation draft, supports and strengthens the intent of PPG 25 in terms of flood risk.</p> <p>PPG 25 rates land into one of three principle zones, as follows;</p> <ol style="list-style-type: none"> 1. Little or no risk - <0.1% 2. Low to medium risk – 0.1 – 1.0% 3. High Risk - .1.0% <p>Reference to the published information in the form of the Environment Agency's Floodplain maps shows the majority of the Frogcastle Farm land to lie within the 1 in 100 (1%) year event flood envelope of the eastern channel of the River Severn. Areas of the</p>		<p>concerning flood risk and having regard to the City's overall housing land supply when compared to draft RSS requirements which suggest that this site is not needed at this stage.</p>
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		<p>Frogcastle Farm land outside the 1 in 100 (1%) year flood envelope of the Severn are seen to lie within the 1 in 1,000 (0.1%) year event envelope. Map provided.</p> <p>Discussions with the Environment Agency confirm that the hydrology at the subject site is well known from past flood events, topographical information and hydraulic modelling. The agency indicates that a maximum flood water level of 11.2m AOD occurred in this area during the March 1947 floods, which are thought to be near equivalent to a 1 in 100 year event. While the A40 has been built since the maximum-recorded flood event, recent flood modelling by the Environment Agency confirms that the site hydrology remains materially unchanged as a result of the highway. Map provided.</p> <p>It is therefore clear that the majority of the Frogcastle Farm land lies within Zone 3 – High Risk Area. Being previously undeveloped land within the functional floodplain, the vast majority of the site is characterised as Zone 3c. In relation to Zone 3c, PPG 25 states that 'Built development should be wholly exceptional and limited to</p>		
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			<p>essential transport and utilities infrastructure that has to be there'. Residential development is therefore not appropriate.</p> <p>Paragraphs 52 and 30 of PPG 25 require local planning authorities to adopt a risk based approach in the preparation of local plans and apply decisions based on a methodology known as the sequential test. This test requires that planning authorities give priority to sites in descending order to the flood risk zones, i.e. developments occupying land having lower flood risk. Paragraph 55 states 'Plans should not provide for development in undeveloped high risk areas that are not currently protected to an appropriate standard, unless that location is essential for a particular development or there are no alternative locations in lower risk areas'. Application of the Sequential Test in relation to the sites currently under consideration in the Consultation Document identified more appropriate, and lower risk sites, which lie within a Zone 1 – little or no risk area. The planning authority should therefore give preference to these lower risk sites in supporting potential allocations.</p>		
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			<p><u>Conclusions and Recommendations</u></p> <p>Flood Risk is a material consideration throughout the land-use and development planning process, which the Planning Authority are required to take into account. PPG 25 (and the emerging PPS 25) is clear in directing development away from unsustainable sites having high levels of flood risk.</p> <p>Allocation of land at Frogcastle Farm would clearly be contrary to planning policy in terms of flood risk and the Authority is strongly recommended to support the more appropriate and readily deliverable sites contained within the Consultation Document.</p> <p>Should the Planning Authority be minded to support an allocation of the Frogcastle Farm land, the Environment Agency confirms that they will robustly object to such proposals.</p>		
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Land South of Grange Road (suggested for housing)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Mr and Mrs Watkins (2 Enborne Close)	Land South of Grange Road	Object	<p>Living opposite this section of land I would be greatly unhappy to see it developed for housing. One of the attractions of living where we do is that there is a sense of living in the countryside because of the green fields close by. Also concerns as the schools are already oversubscribed. There is limited access to bus routes and people would therefore have to rely on private transport – adding to an already busy road system that has a bottleneck at one end (the railway bridge).</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
John Robbie	Land South of Grange Road	Object	<p>Feel that development on land south of Grange Road would be totally unsuitable. Grange Road is very busy both during the mornings and evenings, and is used as a rat-runt o get to Stroud Road.</p> <p>Currently there are 4 new housing estates in Tuffley:</p> <ul style="list-style-type: none"> • Leverton Gate • Copeland Park • RAF Quedgeley 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			<ul style="list-style-type: none"> • Bodium Avenue <p>Therefore I feel that Tuffley is currently being overdeveloped and oppose any such proposed plans.</p>		
Adrian Dean	Land South of Grange Road	Support	<p>No objection to this land being developed for residential purposes provide that the following issues are given proper consideration.</p> <ol style="list-style-type: none"> 1. The residential development is similar to the existing development to the immediate north of Grange Road between Stroud Road and the railway and it comprises no more than 20% social housing 2. Grange road is closed to vehicular traffic at the railway bridge except for emergency vehicles, cycles and pedestrians (more information provided) 3. The developer is required through a Section 106 agreement to provide metalled cycleways of 3 metres minimum width along the south side of Grange Road from Stroud 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			<p>Road to the railway bridge and from Grange Road along the east side of the railway to link with Naas Lane. The latter cycleway, which would need street lighting, would be a good way to provide sustainable access to the new development at Waterwells.</p> <p>4. There should be a minimum of two parking spaces within the curtilage of each dwelling to avoid an excessive amount of on-street parking, which could be a particular problem on Grange Road. The lack of parking provision on new developments in Gloucester is causing severe problems of access, for example the Bellway development at Abbeymead.</p>		
Simon and Vereena Tyler	Land South of Grange Road	Object	<p>The area in question is served by a single road, known as Grange Road, linking the A4173 and A38. This road is already congested especially during peak periods as are both the A4173 heading into Gloucester, where traffic is</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's</p>

		<p>frequently queued past St Peters High School, and the A38. Passage along Grange Road is constrained by the traffic controlled single lane low bridge. There is no potential for developing road access westwards, being blocked by the railway embankment. Access from the proposed development would have to be onto Grange Road adding to the already acute congestion. With Grange Road serving two senior schools and two primary schools and increase in the population would have a marked effect.</p> <p>The development of utilities, particularly in the form of water and more importantly sewage would cause a major disruption to the existing dwellings as it is unclear how either of these utilities could be provided given the nature of the ground and the problems encountered when developing the original grange park development. Disruption to the road network during this work should not be ignored.</p> <p>Shopping in the area is currently limited to two small complexes at Seventh Avenue and Holmleigh Parade. The nearest supermarket is in Quedgeley. This again would</p>		<p>overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
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			<p>result in an increase in road traffic to support provision of just basic food items.</p> <p>The brownfield site at the former RAF Quedgeley main site, south west of Grange Road is already under development and cannot see how a further development in this area is warranted.</p> <p>Appreciate clarification as to the number of proposed dwellings mentioned in paragraph 6.22 at 30 dwellings per hectare while a lower figure for another area of development in paragraph 6.16 is mentioned. Is the site considered medium or high density?</p>		
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Land South of Grange Road	Object	<p>Do not support this proposal as it ventures into the edge of the Special Landscape Area and development would detract considerably from views to and from Robinswood Hill. Socially and economically it is getting further away from the City Centre and work areas.</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

Helen L Wollington	Land South of Grange Road	Object	<p>Strongly object. It should remain as green space. The impact of extra traffic would be detrimental to the area.</p> <p>The site also attracts a wide range of wildlife.</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
G W Lee	Land South of Grange Road	Object	<p>Strongly object. It is the only area of land south of Grange Road that has not been developed and is bordered by Stroud District Council land and a Landscape Conservation Area. There is already a very large development south of at the old RAF Quedgeley at surrounding farmland as well at least two other sites in Tuffley.</p> <p>Grange Road has traffic problems at present and more housing will only make the problems worse.</p> <p>The development would also obscure the view of Whaddon Church and the Cotswold Escarpment.</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			All other sustainable and brownfield sites must be developed before this site is considered.		
Mr and Mrs Franklin	Land South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • Currently the volume of traffic on Grange Road at peak times of the day is high. • If the land were developed the volume of traffic would be excessive, and brings into question road safety. As parents this is a major concern. • Road access out of Tuffley on a morning is congested and it meets the main flow of traffic coming into Gloucester from Stroud. Also added traffic from St Peters School. The current infrastructure struggles to cope and a further development would cripple the area. 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Mr and Mrs D Manley	Land South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • Loss of view • Increased traffic levels which would bring chaos to 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p>

			<p>the roads – there would be severe congestion at peak times</p> <ul style="list-style-type: none"> • The removal of green areas would have a severe detrimental effect on the value of the property as the feature that attracts people to the area would be lost. 		<p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Chris and Sharon Harris	Land South of Grange Road	Object	<p>Object for the following reasons:</p> <ul style="list-style-type: none"> • The current level of traffic travelling along Grange Road/Stroud Road is extremely heavy at peak hours. All routes out of Tuffley are extremely clogged at peak hours. • A large number of children use this route to school. • The current railway bridge would not be able to cope with the increase in traffic. • Considering the large on-going development off Bodium Avenue the environmental impact on such a small suburb would be disastrous. 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Mrs J Matthews	Land South of	Object	Worries that estimated density of		The site lies within the

	Grange Road		<p>approximately 250 dwellings would increase traffic using Grange which would cause even more congestion.</p> <p>Also that the existing schools are already oversubscribed and that if development was to go ahead it would allow Stroud District Council to develop its land up to the motorway.</p>		<p>proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
R J G Winstone	Land South of Grange Road	Object	<p>Object on the following grounds</p> <ul style="list-style-type: none"> • The site forms part of any area of landscape of special value which stretches south of Gloucester between the railway line to Bristol in the west and Matson in the east. If development went ahead these superb views would be lost and value on their houses would be lost. • It would result in wall to wall housing over a large area • The proposal would take productive farmland out of use. • Does demand exist for such a development? 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

Mrs G L Gutteridge	Land South of Grange Road	Object	<p>Concern that local facilities and services would not be able to cope, for example supermarkets, schools.</p> <p>Traffic is already heavy and would be exacerbated by any development.</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Mark J Aplin	Land South of Grange Road	Object	<p>Object to the suggestion of inclusion as a residential site.</p> <ul style="list-style-type: none"> • It is not a sustainable location – the city has sprawled south far enough. It would be isolated, poorly served, and car dependent. • No need to include subject to other sites. The flexibility of the LDF process must be considered, and it could be included within a statutory planning document at a later date as and when may be necessary. 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			Premature to consider in the foreseeable future. Is the kind of location that as a 'site' threatens the overall regeneration of the city.		
Richard Fox on behalf of Wynstones Rudolf Steiner School	Land South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • The site is remote from the major centres of employment and would necessitate a heavy reliance on private car usage resulting in greater pollution, congestion and accidents. • Development of the site would compromise the natural landscape of the adjoining Landscape Conservation Area • Brownfield sites exist in the city boundaries that could be made use of first • Tuffley is poorly served by public amenities (leisure, sport, shopping, public transport etc) and an increase in population would exacerbate this situation. • There is fear that development in the south 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			of the dividing line of Grange Road would become uncontrolled in time. This could lead to the urbanisation of much of the land towards the M5 and the encirclement of Robinswood Hill.		
Richard Fox	Land South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • The site is remote from the major centres of employment and would necessitate a heavy reliance on private car usage resulting in greater pollution, congestion and accidents. • Development of the site would compromise the natural landscape of the adjoining Landscape Conservation Area • Brownfield sites exist in the city boundaries that could be made use of first • Tuffley is poorly served by public amenities (leisure, sport, shopping, public transport etc) and an increase in population would exacerbate this situation. 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			<ul style="list-style-type: none"> • There is fear that development in the south of the dividing line of Grange Road would become uncontrolled in time. This could lead to the urbanisation of much of the land towards the M5 and the encirclement of Robinswood Hill. 		
Mr S F Green	Land to the South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • Too many greenfield sites have been used for housing in Gloucester • It would cause more traffic and congestion along Grange Road 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Kevin Preece	Land to the South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • This is greenfield land. There are brownfield sites around the city that could be used. • Other recent housing developments have 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing</p>

			<p>introduced dangerous traffic problems into areas where were none before.</p> <ul style="list-style-type: none">• Council policy appears to be to pack as many dwellings into a given area with no regard whatsoever as to the amount of off-road parking they will need. As a general rule the number of parking spaces should be at least equal to the number of bedrooms, subject to an absolute minimum of two. Garages should not be included in this figure as many people use them for general storage – not vehicular storage.• The Council does not seem able to enforce developer responsibilities once building is complete and dwellings occupied. Example provided.• Particularly during term-time Stroud Road, Epney Road, Grange Road and adjoining roads can become choked with traffic. Additional traffic from a development would exacerbate the problem.		<p>requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
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<p>Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College</p>	<p>Land South of Grange Road</p>	<p>Object</p>	<p>This site is recognised by the Issues Consultation Report as being not favourably positioned in respect to accessibility by modes other than the private car. Similarly the site is not favourably positioned with regards to employment areas and key local services. As such the site performs poorly in sustainability terms and should only be considered for housing development after more sustainable locations.</p> <p>The scale and location of the site does not lend itself to promoting wider community benefits.</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
<p>Mr and Mrs G H Wheatman</p>	<p>Land South of Grange Road</p>	<p>Object</p>	<p>Strongly opposed to any development on the land to the south of Grange Road. Object on the following grounds:</p> <ul style="list-style-type: none"> • Derelict land in the centre of Gloucester should be developed before considering land on the outskirts. • With all of the development being carried in the Quedgeley area resources are already stretched to 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			the limit and further housing development would exacerbate this.		
E W Banks	Land South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • It would wipe out the escarpment views • It would wipe out all of the west sunsets • Facilities are already nearly non-existent and would be strained even further • It would create extra traffic on an already busy Grange Road • Bybrook stream can only just cope at times – where would any extra surface water from the development go to? 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Brookthorpe with Whaddon Parish Council	Land South of Grange Road	Object	<p>The Council has strong objections to this parcel of land being included in the Local Development Framework for development of any kind.</p> <p>There are very few employment opportunities in the local area and serious transport issues for any non-car users. Any development</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial</p>

			would have a substantial highway impact – firstly at the junction into Grange Road, as it would be located close to a narrow railway bridge. Also at the junction of Grange Road and Stroud Road which is already dangerous and struggles to cope with the volume of traffic at peak times. Any additional pressure on Stroud Road would have a disastrous effect. This is adjacent to open countryside and forms part of a Special Landscape Area. Any development would set precedence for building right up to the motorway.		Strategy, the site has not been identified as a preferred option.
G Ryland and M Ryland	Land South of Grange Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • Loss of privacy, peace and tranquillity • Depreciation in the value of our home • Increased volume of traffic and congestion – especially at peak times • Damage to the environment and natural habitats • The land provides a natural boundary to Tuffley and is the last remaining green space before 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			reaching Robinswood Hill Country Park and the Cotswold escarpment		
Government Office for the South West	Land South of Grange Road	Comment	Why did the Community Forum object strongly to this site? As it is remote from the Central Area, would mixed-use site be more appropriate? Are there opportunities for improving alternative modes of transport links?		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Mavis J Wall on behalf of the Three Bridges Neighbourhood Partnership	Land South of Grange Road	Object	There was a majority vote against building on land adjacent to Grange Road between the Railway Bridge and Stroud Road. 67 people were present at a meeting and most voted against any development.		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
Sian Brian Webb	Land South of	Strongly Object	Object on the following grounds:		The site lies within the

	Grange Road		<ul style="list-style-type: none"> • Traffic flow is severely restricted at the railway bridge at the western end of the stretch of Grange Road. It is estimated that there will be an increased traffic flow of 250 – 375 cars per day. There is already heavy congestion on roads. • There are also plans for development on the Grange Infant School site, which would exacerbate problems further. • On two occasions since the Persimmon development properties have been flooded due to storm water along the Grange Road off the potential development site, proving that the present drainage system is inadequate to cope with surface water. Building houses, increased tarmac and concrete, paving etc will cause enormous problems. • Harwell Close has had to cope on an regular basis with blocked sewerage pipes. If feeder sewer 		<p>proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>
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			<p>pipes were added it would inevitably lead to serious consequences.</p> <ul style="list-style-type: none"> • The document states that 'a defined landscape conservation area lies just to the south of the land and is identified for potential development'. Building would destroy this beautiful landscape. • Previously Stroud Council has tried to purchase land adjacent to your proposed site. If development went ahead, it would open the floodgates for development up to the motorway. • Future developments will have an effect on local schools, which are already over subscribed. Services such as schools and public transport will need to be addressed for the long term before embarking on land development. 		
Occupier of The Old Barn, Grange Road, Gloucester	Land South of Grange Road	Object	Object to any development taking place on this site.		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having</p>

					regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.
Suzy Birdseye on behalf of Hallam Land Management	Land South of Grange Road.	Support	<p>Support on the following grounds:</p> <ul style="list-style-type: none"> Whilst Grange Road lies some 4km from the centre of Gloucester this factor in our contention should carry little weight. What is more significant is proximity to local facilities – those that residents will need to make regular trips to. The site is closely located to schools, employment, doctor and dentist surgeries, convenience stores, sports and community centres, public houses, park land, and places of worship (more in depth review provided. Furthermore, frequent bus services exist and offer a realistic alternative to the private car for regular journeys, particularly to and from the City Centre. Moreover, once the development 		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			<p>south of Grange Road is allocated, bus provision could be reviewed with a view, if necessary, to enhancing the service further and incorporating the contributions necessary into S106 documentation.</p> <ul style="list-style-type: none">• Development at Waterwells, Hunts Grove and RAF Quedgeley have, at various times, included a proposal for constructing a rail halt in close proximity to this site. The rail halt would predominantly serve journeys too and from the city centre and would be readily accessible from this site.• The local primary schools that are easily accessible on foot are currently experiencing falling rolls indicating that there is spare capacity at infant level in the permanent accommodation. Figures provided.• PPG 3 advocates making the best use of existing infrastructure – extract provided.• Accordingly the proximity		
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			<p>of the land south of Grange Road to the above facilities, particularly the schools, is material is the consideration of allocating the site for residential development. Moreover the development would provide the opportunity for enhancing the local community by providing much needed affordable housing, improved bus services and cycle routes. In addition, to improve the sites sustainability credentials further, recycling facilities could be provided on the site, or funded through the S106 at the nearby local centre at Seventh Avenue.</p> <ul style="list-style-type: none">• Sustainability – The allocation of this site could be an opportunity to put into practice some of the measures being suggested in the Government’s recent consultation document ‘Code for Sustainable Homes’ (December 2005), such as energy efficiency, water efficiency and consideration of		
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			<p>construction materials.</p> <ul style="list-style-type: none">• Traffic Impact – Highway Consultants, Borehams, have modelled the impact that a development of this scale would have on the area. They have concluded that the development of this scale will not have any material impact on the local highway network as any perceived local traffic issues can be readily addressed to ensure nil-detriment to the highway. Extract of Consultants report provided.• Competing Greenfield Sites – of all the sites discussed Tuffley represents the most viable option to accommodate additional housing in the City. The other brownfield sites identified are not capable, due to their limited size and location, of accommodating the levels of housing deemed necessary by the emerging Regional Spatial Strategy.		
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			<ul style="list-style-type: none">• Landscape Conservation Area – The land has been placed on the consultation document as being a Landscape Conservation Area. PPS 7 – Sustainable Development in Rural Areas says that Local Authorities should provide sufficient protection for areas without the need for rigid local designations that may unduly restrict acceptable sustainable development. When reviewing local area-wide development plans, Local Authorities should rigorously consider the justification for retaining existing landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned. In this instance the landscape, whilst it does have a raised ridge-line running west to east of the site, is not particularly remarkable in terms of habitat or view and the site is of lower		
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			<p>landscape quality than nearby areas. Greenbelt will not be erodes by the sites development nor will settlement coalescence occur. A strong landscape structure could be incorporated to the south of the development providing a defensible wooded edge to Gloucester. The property is of relatively low ecological value and the majority of hedgerows and mature trees could be retained. Daniels Brook, which runs south of the property, could be considerably enhanced by re-engineering the channel to incorporate features of value to wildlife. The raised ridgeline of the site could be utilised to provide much needed public open space for the area. Accordingly we do not consider that the LCA designation is appropriate and would urge the Council to consider its inclusion within any residential allocation.</p>		
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			<ul style="list-style-type: none"> District and Local Centres. See representations on these. Development south of Grange Road provides for an opportunity to enhance the local centres further. 		
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Land South of Grange Road	Object	<p>We object to this site being put forward as a potential housing allocation under the LDF and believe the site should be left undeveloped and retained as greenfield land.</p> <p>While the site could be considered a natural extension of the residential area from the north of Grange Road to the railway, the lack of a defensible boundary to the south of the site does not make this a logical rounding-off to the built up area. We do not consider it appropriate to rely on the arbitrary boundary as proposed.</p> <p>The south of the site is a defined Landscape Conservation Area and the proximity of the site to the railway line generates a number of residential amenity issues regarding noise.</p> <p>There are also issues regarding</p>		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

			<p>the remoteness of the site to local services, employment opportunities and public transport links, with residential development on this site likely to encourage an increased use of the private car.</p> <p>We note that there are already some objections regarding the potential development of this site, particularly in environmental terms. We therefore consider that the site should remain undeveloped and preserved as greenfield land.</p>		
Ceri Porter on behalf of the Environment Agency	Land South of Grange Road	Comment	It is appropriate for the site to come forward only when brownfield opportunities have been exhausted.		<p>The site lies within the proposed new greenbelt designation south of Gloucester.</p> <p>In light of this and having regard to the City's overall housing requirement as set out in the draft Regional Spatial Strategy, the site has not been identified as a preferred option.</p>

Land Between A38 and Bristol Road (suggested for housing)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
David Radcliffe-Watts	Land between A38 and Bristol Road	Object	<p>Objections are as follows:</p> <ul style="list-style-type: none"> • It is the last remaining green site this side of Bristol Road in Quedgeley/Hardwicke and should remain so for future generations to enjoy and for cows to graze in. • With 2,500 new houses being built on the old RAF site more houses is something that Quedgeley does not need. • There are insufficient facilities in Quedgeley/Hardwicke to cope with the additional population that new housing will bring bearing in mind the current developments which are stretch what we already have. • The Bristol Road cannot cope with the increase with the increase in traffic that developments of this site will bring and so will become even more 		<p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield sites to come forward as a priority.</p> <p>Redevelopment of the site would be required to provide public open space as part of the development.</p>

			congested than it is already.		
Mrs R Hodson	Land between A38 and Bristol Road (Mayo's Land)	Object	<p>The B4008 and Quedgeley Bypass are heavily congested during the rush hour. Suggest gridlock when the thousands of houses being built at the moment are finished?</p> <p>Do not feel that any more houses are needed in this area. There is a need for more green land.</p>		<p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield sites to come forward as a priority.</p> <p>Redevelopment of the site would be required to provide public open space as part of the development.</p> <p>The transport implications of potential development would be determined through the development control process.</p>
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Land between A38 and Bristol Road	Support	It would seem reasonable to fill in this space.		Support noted. The preferred option is to allocate this site for residential development in the period post-2013

					and to encourage a comprehensive development including land to the south.
Bernard and Jean Cook	Land between A38 and Bristol Road	Object	<p>This is one of the last open green fields left in Quedgeley where nature still thrives.</p> <p>Concerns raised over access – any new development would add to congestion along Bristol Road.</p>		<p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield sites to come forward as a priority.</p> <p>Redevelopment of the site would be required to provide public open space as part of the development.</p>
Mark J Aplin	Land between A38 and Bristol Road	Support	<p>Support allocation for residential development. Less unsustainable than other greenfield sites.</p> <ul style="list-style-type: none"> • However the city should be getting a higher premium on suburban sites than previously. This should be much higher quality in 		Support noted.

			<p>terms of design, pedestrian movement, and greater resource self-sufficiency. Should include significant affordable housing element.</p> <ul style="list-style-type: none"> • Sensible to work with Stroud District Council. However this would inevitably legitimise their practice of 'decentralising' their housing supply to the periphery of the borough - the process that does so much to undermine sustainable development in the county. 		
Catherine and Colin Ditchfield	Land between A38 and Bristol Road	Object	<p>Object on the following grounds:</p> <ul style="list-style-type: none"> • Quedgeley is becoming a concrete jungle • Concern about the increase of traffic levels on both the dual-carriageway and Bristol Road. Noise from traffic is already audible from the property. Traffic on these would increase if development went ahead. • Quedgeley does not have enough facilities to keep accommodating more 		<p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield sites to come forward as a priority.</p> <p>Redevelopment of the site would be required to provide public open</p>

			<p>housing growth. The schools are already overcrowded, there are few children's play areas. Tesco's is overcrowded everyday. The doctors and dentists facilities are already pushed to the limit.</p>		<p>space as part of the development.</p>
<p>Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College</p>	<p>Land between A38 and Bristol Road</p>	<p>Object</p>	<p>This site is recognised by the Issues Consultation Report as not favourably positioned with respect to accessibility by modes other than the private car. Similarly the site is not favourably positioned with regards to employment areas and key local services. As such the site performs badly in sustainability terms and should only be considered for housing development after more sustainable locations.</p> <p>The scale and location of the site does not lend itself to promoting wider community benefits.</p> <p>This area of Gloucester has seen a significant period of rapid change with unknown consequences. It would be prudent to delay further work in this location until RAF Quedgeley is better established.</p> <p>The site performs poorly in</p>		<p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield sites to come forward as a priority.</p>

			<p>sustainability terms and should only be considered for housing development after more sustainable locations, including Frogcastle Farm, Sandhurst Lane. This is in accordance with the sequential test established in PPG 3, the emerging PPS 3 and the Council's own sustainability appraisal.</p>		
<p>G L Hearn on behalf of Westbury Homes (Holdings) Limited</p>	<p>Land between A38 and Bristol Road</p>	<p>Support</p>	<p>Westbury Homes (Holdings) Limited controls this area that has historically been known as 'Mayo's Land'. The site forms part of a larger area which lies partly in Gloucester City's boundary and partly in Stroud. Westbury Homes has long considered this area to be suitable for residential development and therefore supports the views expressed in the issues and options paper stating that this site would be a suitable and logical site for residential development.</p> <p>There are no reasons why this site should not be allocated for development. The part of the site that is within Stroud District was allocated for housing in the deposit draft plan version of the Stroud District Plan. Stroud has however subsequently deleted the allocation</p>		<p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield sites to come forward as a priority.</p>

			<p>and pursued the major allocation at Hunts Grove together with the remainder of allocations in smaller settlements.</p> <p>The Stroud Local Plan Inspector considered that the decision of whether to allocate Mayo's land was finely balanced. He considered that the site is within the built urban form extending out of Gloucester City, it is readily available for development within a short-timescale and there is no highway or transport issue preventing the allocation of the site.</p> <p>The principle reason given by the Inspector for not to recommend the site was that there was no need for a further allocation.</p> <p>Stroud District Council has indicated that it will consider Mayo's land in future review as part of the LDF.</p> <p>Whilst a joint approach between Gloucester and Stroud to developing the site would be welcomed, the first step in allocating Mayo's land should now be taken by Gloucester. As the Gloucester portion of the whole site will provide the means of access to</p>		
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		<p>the site there is no reason why the northerly part of the site should not be allocated in advance of the Stroud portion of the site.</p> <p>The development of the Mayo land would be sustainable in terms of location, proximity to employment opportunities, shopping facilities, and transport links including public transport. It is surrounded by existing development and its development will not encroach into the countryside or onto land that has environmentally sensitive designations.</p> <p>The Mayo site compares favourably with other greenfield sites that are being put forward for discussion purposes that are either less favourably located in terms of sustainability, or subject at least in part to landscape and flooding constraints.</p> <p>The Mayo site represents an opportunity to provide housing with a minimum of delay, with there being no major infrastructure hurdles to surmount.</p> <p>Please note further details of Planning Inspectors Report including copied sections have been included.</p>		
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<p>Suzy Birdseye on behalf of Hallam Land Management</p>	<p>Land between A38 and Bristol Road</p>	<p>Object</p>	<p>Oppose the allocation of this land. This is currently a draft employment allocation and is not considered by ourselves or the Community Forum Members in meeting of 12th September 2005 as being a suitable location for housing. This site is the furthest away from Gloucester City Centre. Whilst two major roads run on the sites west and east boundaries, it is also bounded by industrial units on all sides except the south west. Infrastructure funding and access is a considerable problem for this site and these issues will take some time to be resolved, thus prohibiting the site to move forward quickly.</p>		<p>This is not a current employment allocation.</p> <p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield sites to come forward as a priority.</p> <p>Redevelopment of the site would be required to provide public open space as part of the development.</p>
<p>Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited</p>	<p>Land between the A38 and Bristol Road</p>	<p>Object</p>	<p>We consider that this area could be allocated for employment use, continuing the land-use to the east of the site with the Waterwells Business Park.</p> <p>An employment use on this site would increase job opportunities for the local population and form a logical extension to the business</p>		<p>The preferred option is to allocate this site for residential development in the period post-2013 and to encourage a comprehensive development including land to the south.</p> <p>This will allow brownfield</p>

			parks to the east of the A38.		sites to come forward as a priority.
Ceri Porter on behalf of the Environment Agency	Land between A38 and Bristol Road	Comment	<p>The Dimore Brook runs along the northern boundary of the site and is culverted under the adjacent A38. This culvert has become blocked and water has backed up in the past. A Flood Risk Assessment would be required to determine the extent of flooding on the site and to demonstrate that there will be no development within at least 8m of the top of the bank of Dimore Brook. This would allow access for maintenance and provide a generous natural river corridor.</p> <p>The Dimore Brook is also a sensitive watercourse and any surface water discharge would need to be attenuated and treated using the SUDS Management train approach prior to entering the brook.</p>		Comments noted. Amend text accordingly.
Gareth Barton of Turley Associates on behalf of Westbury Homes	Land between A38 and Bristol Road	Support	Although classified as greenfield land the site is almost entirely bordered by built development and should be regarded as being within		Support noted.

<p>(Holdings) Limited</p>			<p>the built form extending out of Gloucester City. The site is currently laid to rough pasture and is classified as Grade 3B (moderate quality) under the DEFRA Agricultural Land Classifications.</p> <p>The site is considered suitable for housing given its sustainable location within the Gloucester Principle Urban Area. The site is in close proximity to a number of community services/facilities including; a post office, schools, public houses, a village hall, a district centre and medical facilities. The site is also less than a mile from a variety of existing employment uses, including Waterwells Business Park. The sustainability of the site is enhanced by its proximity to RAF Quedgeley, which is currently being redeveloped to provide 40 hectares of B1/B8 employment uses, two primary schools and a local centre. The Second Stage Deposit Local Plan also allocates an additional 7.2 hectares of land for strategic employment uses to the north of Waterwells Business Park and 15.1 hectares to the east. There is also a substantial mixed-use allocation at Hunts Grove, which is situated to the south-east</p>		
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			<p>of the site (within the Stroud District Council administrative boundary). The site benefits from good public transport links to major existing facilities and services. There is also an established cycle route to the north of the site.</p> <p>Mayo's land therefore, represents a logical and highly sustainable infill site within a recognised PUA.</p> <p>The site effectively forms part of a larger parcel of land. The other (approximately) half extends to the south and falls within the administrative boundary of Stroud District Council. Although the site is capable of being developed separately from the adjoining land to the south, it is considered preferable for the land to be developed as a whole. This approach is supported by the Stroud District Local Plan Inspector's Report (December 2004) which concludes that the site should be seen as a 'single entity' and that ideally the site should be brought forward in tandem with the other 'half' (paragraph 5.39.6. The Inspector also emphasised that 'Stroud District Council would co-operate with (Gloucester City Council) if there was a joint decision to allow housing</p>		
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			<p>development on the site'. The LDF process provides an opportunity for the City Council to work in partnership with Stroud District Council to bring forward residential development on this sustainable greenfield site within the existing urban area; effectively reducing pressure to release less sustainable greenfield land.</p> <p>There are no major constraints to the development of the site for housing. The site is available within a relatively short time period and it has previously been accepted that there are no highway or transport issues preventing the allocation of this site (paragraph 5.39.3 of Stroud District Council Local Plan Inspectors Report).</p>		
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Clifton Road Triangle (suggested for housing)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Mr and Mrs A Thomas	Clifton Road Triangle	Support	<p>Have no objection to this land being used for possible future housing, except for parking – which would one would assume would be addressed through planning regulations.</p> <p>It would in fact be a major improvement to the area.</p>		Support noted. Parking levels will be determined in accordance with the Council's approved parking standards and having regard to the location of the site and opportunities for non-car modes of transport.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Clifton Road Triangle	Support	It would seem reasonable for housing as close to work and shops. However close to a busy road.		Support noted. The proximity of the road is not considered a barrier to development. Appropriate sound insulation will be agreed through the development control process if necessary.
Mark J Aplin	Clifton Road Triangle	Support	Support general approach.		Support noted.
Pat Roberts	Clifton Road Triangle	Support	Support. Some green space would be good – perhaps gardens in the		Support noted. Public open space will be

			centre.		required as part of any development.
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Clifton Road Triangle	Object	<p>We believe that this site is more suited to accommodating a mixed-use scheme as opposed to a purely residential development.</p> <p>With a 'Toys R Us' located opposite the site on Bristol Road and a Chinese Cash and Carry situated opposite the site on Clifton Road, this 'island' site borders the divide between the residential and commercial uses in the area.</p> <p>We consider that Bristol Road, as one of the main routes into Gloucester City Centre, would benefit from active commercial frontage and we therefore propose the retention of an employment or retail use on the site with some residential development.</p> <p>The retention of job opportunities within the scheme would help offset any jobs that might be displaced from redeveloping the site. Additional housing units could be allocated on Stroud Road, resulting in a natural rounding off of the residential development on this street.</p>		<p>Agree in part. The site lends itself to mixed-use development and if a mixed-use scheme of appropriate and compatible uses were to be submitted this would be considered on its merits.</p> <p>The preferred option for the site is however the provision of solely residential.</p>

			A mixed-use development would reduce the residential capacity of the site and additional allocations should therefore be made elsewhere.		
Ceri Porter on behalf of the Environment Agency	Clifton Road	Comment	The north of the site is identified as being within the floodplain. A Flood Risk Assessment is therefore required to ascertain the extent of flooding on site with appropriate mitigation proposed. A desk study should be submitted with any planning application.		Comment noted. The text of the policy refers to the need for a Flood Risk Assessment to be carried out as part of any development proposal.

Star 66 Youth Centre (suggested for housing)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Marie Davies	Star 66 Youth Centre	Object	<p>Feel very strongly against any housing development on this site.</p> <p>The buildings as it stands serves the local community well and is the only place for such activities as youth groups etc.</p>		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.

Alex Cooke	Star 66 Youth Centre	Object	<p>Strong objection to redeveloping the Star 66 building on Seynour Road. Concerned with the disfigurement of a local community facility and an historic building.</p> <p>Suggest that the City Council works with the County Council to preserve it as best is possible.</p>		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.
Ian Dowdeswell	Star 66 Youth Centre	Object	<p>Strong objection to this site as a potential site for housing.</p> <p>Assume that the existing building would not be redeveloped. I am concerned for the potential loss of an historic building.</p> <p>Concerned that the footprint of the site would lead to the construction of high density housing and that this in turn could lead to problems regarding traffic congestion and parking allocation, which is already a challenging issue in the Linden area.</p>		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.
Celia Sleight Smith	Star 66 Youth Centre	Object	<p>Strongly oppose because parking problems would increase. Also Star 66 is a well used resource by many local groups.</p> <p>The area currently has the right of</p>		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of

			everything – there is plenty of housing already established and Star 66 is of historical importance.		this site would yield, it has not been identified as a preferred option.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Star 66 Youth Centre	Object.	If the youth centre is used then provision should be made for this function. Parking would be required.		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.
Kirstie Cratchley	Star 66 Youth Centre	Object	Object as there is a lack of parking and if more houses were built this would only increase the problem. The current site is also the only place that the community can use.		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.
Darryl Hawkins from The Bizz	Star 66 Youth Centre	Support	About to take freehold possession of this site. Would like to put the building forward for potential mixed-use. Please advise on the course of action.		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as

					a preferred option.
Mark J Aplin	Star 66 Youth Centre	Support	This needs sympathetic conversion, but residential principle is acceptable.		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.
Government Office for the South West	Star 66 Youth Centre – Paragraph 6.34	Comment	If this site is owned by Gloucestershire County Council, what are their views on the potential of the Star 66 Youth Centre.		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.
Pat Roberts	Star 66 Youth Centre	Support	Housing would be good provided the character of the building is retained. Maybe live/work for artists or small businesses.		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.

<p>Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited</p>	<p>Star 66 Youth Centre</p>	<p>Object</p>	<p>We object to this site being allocated for development and do not believe that this site is suitable for part conversion to housing, even if a community use is retained.</p> <p>The building is located within a predominantly residential area and the loss of such a community space would therefore result in an adverse impact upon local amenity.</p> <p>We recognise concerns for ensuring that the most efficient use of the buildings is made, but we consider a Youth Centre to be a valuable asset for the whole community and a facility that should be enhanced with an increased role in community life.</p> <p>There is a need to both encourage community activity and cater for young peoples recreational needs. There are no other such clubs in the area and few other amenities for young people. We therefore consider that the interests of local community should be protected by the retention of this facility.</p> <p>Whilst it is acknowledged that the part conversion of the site to</p>		<p>In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.</p>
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			<p>housing will retain a community use within it, the development of housing on this site will leave the existing community use of the building insecure and vulnerable to future conversion. The redevelopment of this site of this site would result in the loss of a valuable asset to the community.</p> <p>While issues of housing need must be considered, part conversion of this site will not yield a particularly high number of dwellings, nor should it be allocated for development when other more sustainable sites around Gloucester are available.</p> <p>We therefore consider that this should not be allocated for development and the current use of the building should remain unchanged.</p>		
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Star 66	Support	We support the allocation of this site for whole or partial residential development, possibly on a mixed-use basis with community functions on the ground floor.		In light of the community use of this building, the City's overall housing requirements and the relatively small number of dwellings the allocation of this site would yield, it has not been identified as a preferred option.

Norville Site, Tarrington Road, Tredworth (suggested for housing)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Jen Walker	Norville Site	Support	Initial view for the future of the Norville site would be its demolition and replacement by housing development in keeping with the surrounding area and emphasis on making the most of the unique feature of Sudbrook in a park-land type walkway/cycleway for all residents and inner city commuters to enjoy.		<p>Comment noted. Any redevelopment of this site would be required to have regard to the character of the area in which it is located and any opportunities to make the most of existing features.</p> <p>The site is allocated for mixed-use housing and employment development.</p>
Mr R Summerhill	Norville Site	Support	Strongly support the demolition of these works for the use of housing.		<p>Having regard to the need to balance new housing with employment opportunities it is considered most appropriate to identify this site for mixed-use housing and employment development. This will not only provide some new housing including affordable housing but will retain job</p>

					opportunities in an area of low car ownership.
Miss Tina Boucher	Norville Site	Object	<p>Concerns and objections are as follows:</p> <ul style="list-style-type: none"> • Parking – the development would add to what is already a congested area • Children en-route to and from school are more likely to suffer from the results of increased traffic from this development • As a resident of Tredworth I am deeply concerned at the continued programme of building (housing) in which is an already saturated community. 		<p>Having regard to the need to balance new housing with employment opportunities it is considered most appropriate to identify this site for mixed-use housing and employment development. This will not only provide some new housing including affordable housing but will retain job opportunities in an area of low car ownership.</p> <p>The traffic impact of any development including parking would be considered as part of the development control process. A Transport Assessment is likely to be required and possibly a Travel Plan.</p>
Miss L G Branford	Norville Site	Support	No objection to private houses being built – but not affordable housing.		It is Council policy to seek affordable housing on sites of more than 15 dwellings in order to

					address the housing need identified in the 2005 Housing Needs Survey for Gloucester. The development of this site for mixed-use housing and employment will therefore attract a requirement to provide affordable housing. There is no reason why this should not be provided on site.
S Mince on behalf of Residents at Numbers 1, 3, 5, 7, 13, and 15 Tarrington Road	Norville site	Support	<p>If the site is to be developed please have consideration to the following:</p> <ul style="list-style-type: none"> • Tasteful affordable dwellings for families or the elderly • Have regard to parking and congestion caused by the development 		<p>It is Council policy to seek affordable housing on sites of more than 15 dwellings in order to address the housing need identified in the 2005 Housing Needs Survey for Gloucester. The development of this site for mixed-use housing and employment will therefore attract a requirement to provide affordable housing.</p> <p>The traffic impact of any development including parking would be considered as part of the development control process. A Transport</p>

					Assessment is likely to be required and possibly a Travel Plan.
Clare Moody and Gareth Fisher	Norville Site	Support	<p>Comments as follows:</p> <ul style="list-style-type: none"> • There is a stream running very close to the factory – would oppose any move to either culvert or build over the stream. Suggest any development would need to incorporate security fencing. • Concern raised over traffic creates and the issue of parking. It is already hard to park cars in the area. New development would need to incorporate enough parking for new residents. • Request clarification as to the nature and amount of affordable housing • If the site was to remain as an industrial complex, serious questions would have to be asked regarding the type of business. Any noisy industrial factory would have serious effects on the 		<p>Comments noted.</p> <p>The traffic impact of any development including parking would be considered as part of the development control process. A Transport Assessment is likely to be required and possibly a Travel Plan.</p> <p>The other detailed points raised concerning the stream, nature and amount of affordable housing, and type of housing provided would be determined at the planning application stage.</p> <p>If is acknowledged that a B1 employment use would be most suitable in this location in order to avoid any potential harmful impact on existing residents.</p>

			<p>quality of life, property values etc</p> <ul style="list-style-type: none"> • Oppose redevelopment of site for flats as properties would be seriously overlooked. 		
Mark J Aplin	Norville Site	Support	<p>Employment should be maintained. Given social inclusion in the area, activity such as small business units should continue, enabled by market housing if necessary.</p>		<p>Agree in part. Having regard to the need to balance new housing with employment opportunities it is considered most appropriate to identify this site for mixed-use housing and employment development. This will not only provide some new housing including affordable housing but will retain job opportunities in an area of low car ownership.</p>
Government Office for the South West	Norville Site – Paragraph 6.37	Comment	<p>If there have been no problems with the existing business uses and the adjoining residential use, who considers that housing could enhance the character of the area? On the face of it, this site appears to offer a good opportunity for a mixed-use scheme, particularly in the light of the shortage of employment land in Gloucester (as</p>		<p>Having regard to the need to balance new housing with employment opportunities it is considered most appropriate to identify this site for mixed-use housing and employment development. This will not only provide some new</p>

			stated in paragraph 8.14).		housing including affordable housing but will retain job opportunities in an area of low car ownership.
Pat Roberts	Norville Site	Support	Housing and office/studio space would work well together on the site.		Having regard to the need to balance new housing with employment opportunities it is considered most appropriate to identify this site for mixed-use housing and employment development. This will not only provide some new housing including affordable housing but will retain job opportunities in an area of low car ownership.
Amit Malhotra for RPS Planning	Norville Site	Support	Support redevelopment for housing rather than employment. The site at present is not used effectively and is not considered an appropriate site for employment use given the close proximity to of existing housing, a school and the general residential character of the access road.		Having regard to the need to balance new housing with employment opportunities it is considered most appropriate to identify this site for mixed-use housing and employment development. This will not only provide some new housing including

			<p>A proposal for housing would help meet the housing targets for the borough and in particular development brownfield sites rather than greenfield sites.</p> <p>It would also accord with Government advice set out in paragraph 42a of PPG 3 (extract provided). The paragraph also sets out a criteria based approach in which applications will be considered favourably (extract provided).</p> <p>This site should therefore be considered favourably for housing as it is located within a residential area, close to designated cycle routes and is supported by the proximity of shops and services within walking distance of the site.</p> <p>The City Council should aim to make more efficient use of urban land, particularly in this case as it is within a sustainable location. A proposal for housing could meet wider borough objectives and create regeneration and sustainable benefits.</p>		affordable housing but will retain job opportunities in an area of low car ownership.
Nathaniel Lichfield and Partners for Cavanna Homes	Norville Site	Object	We are not in favour of allocating this site for housing due to the loss of employment land that would		Having regard to the need to balance new housing with employment

<p>(South West) Limited</p>			<p>result from its redevelopment. We consider that an active employment site should be retained on the site. We are particularly concerned about the loss of employment land for small businesses and the displacement of jobs from the site.</p> <p>A mixed-use development would be an agreeable alternative, which we consider to be a more sustainable option than the complete replacement of the site with a residential scheme.</p> <p>We believe that the retention of the employment use within the site will have positive benefits for the local community in terms of access to jobs and it will also help to support the growth of small businesses.</p> <p>We are therefore in favour of retaining the employment use for this site, either in its entirety or as a mixed-use development of housing and employment.</p>		<p>opportunities it is considered most appropriate to identify this site for mixed-use housing and employment development. This will not only provide some new housing including affordable housing but will retain job opportunities in an area of low car ownership.</p>
<p>Ceri Porter on behalf of the Environment Agency</p>	<p>Norville Site</p>	<p>Comment</p>	<p>The site is located within the floodplain of the Sud Brook which runs along the eastern boundary and is currently culverted through the site. We would wish to see this section of the culvert opened and</p>		<p>Having regard to the need to balance new housing with employment opportunities it is considered most appropriate to identify this</p>

			included within the Flood Risk Assessment of the site. The sequential test should then be applied in accordance with PPG 25 to assess the suitability of this site for development.		<p>site for mixed-use housing and employment development. This will not only provide some new housing including affordable housing but will retain job opportunities in an area of low car ownership.</p> <p>The draft text of the policy refers to the need for a Flood Risk Assessment to be submitted as part of any planning application.</p>
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Other Sites (for housing)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Boyer Planning representing the Trustees and Beneficiaries of Winnycroft Farm	Other Potential Housing Sites	Support	It will be recalled that the previous Local Plan Inspector had confirmed the suitability of the western part of Winnycroft Farm as a site suitable for housing development. Subsequently a detailed reappraisal of site circumstances - see document entitled 'Winnycroft Farm, Gloucester – Landscape Reappraisal'. Attention is drawn to the site specific merits of		<p>This alternative housing site has been assessed against the Council's sustainability appraisal matrix and does not perform well.</p> <p>In light of the City's housing requirements set out in the draft RSS and the availability of</p>

			Winnycroft Farm in the responses to the First Deposit Local Plan of 2001. Copy of submission provided.		<p>previously developed land in the Central Area, there is no need to allocate this large greenfield site for development.</p> <p>No change.</p>
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Other Potential Housing Sites	Support	<p>Land to the east of Matson Lane;</p> <p>Ramada Hotel and Resort Matson Lane Robinswood Hill Gloucester GL4 6EA</p> <p>The potential housing development area is 3.87 hectares. Map provided.</p>		<p>This alternative housing site has been assessed against the Council's sustainability appraisal matrix and does not perform well.</p> <p>In light of the City's housing requirements set out in the draft RSS and the availability of previously developed land in the Central Area, there is no need to allocate this site for development.</p> <p>Further information is set out in the draft DPD and the sustainability appraisal report.</p> <p>No change.</p>

<p>Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc</p>	<p>Other Potential Housing Sites</p>	<p>Support</p>	<p>Land to the west of Matson Lane; Gloucester Golf Course and Ski Centre Matson Lane Ronbinswood Hill Gloucester GL4 6EA</p> <p>The potential housing development area is up to 40 hectares.</p>		<p>This alternative housing site has been assessed against the Council's sustainability appraisal matrix and does not perform well.</p> <p>In light of the City's housing requirements set out in the draft RSS and the availability of previously developed land in the Central Area, there is no need to allocate this site for development.</p> <p>Further information is set out in the draft DPD and the sustainability appraisal report.</p> <p>No change.</p>
<p>W W Strachan for RPS on behalf of Sylvanus Lyson's Charity</p>	<p>Other Potential Housing Sites – Land to the North and East of Manor Farm House, off Hempsted Lane</p>	<p>Support</p>	<p>Draw attention to land at Hempsted and its suitability for residential purposes so that the site can be properly considered as part of the issues and options process leading to the preferred options document.</p> <p>The Hempsted land is readily accessible to the city centre, has access to existing facilities in Hempsted Village, is closely associated to existing employment</p>		<p>This alternative housing site has been assessed against the Council's sustainability appraisal matrix and does not perform well.</p> <p>In light of the City's housing requirements set out in the draft RSS and the availability of previously developed</p>

			<p>opportunities and had ready access to recreational areas adjacent to the River Severn and more locally in the form of existing play areas and other facilities.</p> <p>Suggest that this land could be considered comprehensively with land owned by the City Council adjacent and currently in open space use. This approach could lead to a more appropriately located central open space which would be better positioned in respect of the majority of existing village of Hempsted and would allow further residential development along the line of the Hempsted bypass.</p> <p>The charity would be prepared to enter discussions with the City Council and local interests in order to develop a Masterplan.</p>		<p>land in the Central Area, there is no need to allocate this Greenfield site for development.</p> <p>Further information is set out in the draft DPD and the sustainability appraisal report.</p> <p>No change.</p>
<p>Hamiltons on behalf of J Davies Esq., Newark Farm, Hempsted, Gloucester</p>	<p>New Potential Housing Sites – Land to the West of Hempsted Lane and Newark Farm</p>	<p>Support</p>	<p>The acute housing need cannot be met by the existing site allocations set out in paragraphs 6.8 and 6.9.</p> <p>Put forward 1.5 hectares of land that meets the sustainability requirements of housing policy.</p> <p>The land is within walking distance of the village primary school,</p>		<p>This alternative housing site has been assessed against the Council's sustainability appraisal matrix and does not perform well.</p> <p>In light of the City's housing requirements set out in the draft RSS and</p>

			shops, post office and church. Regular bus services operate to and from Gloucester City Centre.		<p>the availability of previously developed land in the Central Area, there is no need to allocate this Greenfield site for development.</p> <p>Further information is set out in the draft DPD and the sustainability appraisal report.</p> <p>No change.</p>
Scott Winnard for BK Property Consultants on behalf of an unnamed client	Potential New Housing Sites – Land to the North East of Frogcastle Farm	Support	Site of 7.7 acres that forms a sustainable site that should be considered for care home/residential use.		<p>This alternative housing site has been assessed against the Council's sustainability appraisal matrix and does not perform well.</p> <p>In light of the City's housing requirements set out in the draft RSS and the availability of previously developed land in the Central Area, there is no need to allocate this Greenfield site for development.</p> <p>Further information is set out in the draft DPD and the sustainability appraisal report.</p>

					No change.
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Potential New Housing Sites – Land to the South of Hempsted (Hill Farm)	Support	<p>We consider the above site is suitable for new housing development and request that this land is included as a potential site for housing allocation under the LDF.</p> <p>The land currently consists of fields to the south of Hempsted bounded by a depot to the east and the Netheridge treatment works that lie around 0.5km to the south.</p> <p>It is proposed that this site would provide for a range and mix of housing types to meet the different housing needs of Gloucester. It is inevitable that many of the City Centre sites identified within the document will become the focus for one or two bedroom flats and apartments and will not be able to deliver the breadth of housing required. It is therefore important that sites outside Gloucester City Centre are allocated in sustainable locations for lower density housing development. It is anticipated that this site has the capacity to accommodate approximately 300 dwellings.</p>		<p>This alternative housing site has been assessed against the Council's sustainability appraisal matrix and does not perform well.</p> <p>In light of the City's housing requirements set out in the draft RSS and the availability of previously developed land in the Central Area, there is no need to allocate this site for development.</p> <p>Further information is set out in the draft DPD and the sustainability appraisal report.</p> <p>The need to provide a mix of dwelling types is fully recognised and the Central Area Action Plan will ensure that where appropriate, new housing in the Central Area includes a mix of different house types including housing suitable for</p>

			<p>The south-west of the site is within the edge of the defined floodplain which acts as a natural defensive boundary to further development on the site. It is intended that this area will be planted and to form an attractive soft border marking the extent of the site and greatly increasing the amenity value of the site for residents.</p> <p>The site does not lie within any landscape or ecological designations, and would represent a logical infill between the existing built up area of Hempsted and the Netheridge treatment works.</p> <p>We recognise the concerns regarding the proximity of the site to the Netheridge treatment works. However, although the Cordon Sanitaire, as currently drawn, extends to 800m, it should be noted that the standard size is now between 25 and 400m, according to the type of processes that are carried out, the size of works, industrial effluents involved, land-use around the site, any anticipated extensions and site topography.</p> <p>Upgraded and technological advancements to the sewerage systems and improvements to the</p>		<p>families.</p> <p>No change.</p>
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			<p>quality of treatment standards means that there is scope to reduce the cordon and we therefore request that there is scope to reduce the cordon and we therefore request that the Cordon Sanitaire is redefined to a maximum distance of 400m in the LDF, to reflect more accurately the area within which development may be affected by the sewerage works. It should be noted that the Hempsted Hill Farm site falls well outside the Cordon Standard.</p> <p>We consider that this site is particularly suited for housing development due to its proximity to local services, employment opportunities and its excellent links with the City and surrounding areas. The nearest Post Office is under 400metres away and there are local primary and secondary schools within close proximity to the site.</p> <p>The Gloucester South West Bypass, which is currently under construction, will greatly increase the accessibility of the site and it is scheduled to be completed and open to vehicles by April 2007. The route of the new bypass runs through the north-eastern corner of the site and when complete, will</p>		
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			<p>provide a new strategic link from the M5 and Primary Route Network south of Gloucester to the A417 west of Westgate Bridge.</p> <p>One of the Central aims of the bypass is to reduce traffic on Bristol Road. This will allow improvements to be made to bus, cycling, and pedestrian facilities, which will significantly increase the sustainability of the development at Hempsted. The accessibility of the site will allow the development to be based around good public transport connections, and contributions to local public transport could be funded through development of the site.</p> <p>Plan of site provided.</p>		
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Potential Other Residential Sites	Support	<p>Below is a list of sites owned by the County Council that we wish to promote in part or whole for residential development. Residential use may depend on first confirming that alternative sites are inappropriate or unviable. This list is for detailed discussion. Plans are attached.</p> <ul style="list-style-type: none"> • Clearwater Drive • Paygrove Lane 		<p>Land at Leven Close and Clearwater Drive and Blackbridge allotments have been identified.</p> <p>The reasons for not taking forward the other sites are set out in full in the document.</p>

			<ul style="list-style-type: none"> • Land to the Rear of Leven Close • The Wheatridge • Former allotments at Blackbridge, Stroud Road • Star 66, Seymour Road • Shepherd Road Depot, Eastern Avenue • Former Colwell School, Derby Road • Surplus land at Saintbridge House, Painswick Road 		
DTZ Pidea Consulting on behalf of E.ON UK Plc	Potential Other Residential Sites	Support	<p>Our client, E.ON UK Plc, instructs us to submit representations to the allocations/designations Development Plan Document.</p> <p>E.ON owns a site that is located in the Barnwood Area of Gloucester, approximately 1.5 miles east of Gloucester City Centre. The entrance to the site is located directly off the A417 via an access road, which is shared by the subject site and the Barnwood Park Office Development. It is also possible to access the site from Hammond Way to the south.</p> <p>The site is operated by Central Networks (formerly MEB) and comprises a two-storey office/storage block, a garage</p>		Agree. This site has been allocated for residential development.

			<p>building and a number of smaller storage buildings. Substantial areas of hard-standing that are used for parking private cars and fleet vehicles also cover the site.</p> <p>The part of the site bounded in red ('the proposal site') is approximately 0.25 hectares and is comprised solely of hard-standing and is surplus to the requirements of E.ON. Accordingly E.ON consider that this surplus land is suitable for residential development and should be allocated within the emerging Development Plan Document.</p> <p>The proposal site is situated adjacent to residential development on all but its northern boundary. The proposal site benefits from an existing access onto Hammond Way and could also be accessed from Fairwater Park. E.ON consider that the site can be suitably redeveloped to accommodate between 10 and 13 residential dwellings taking into account siting, design, and impacts from adjacent uses.</p> <p>Site plan included.</p>		
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EMPLOYMENT SITES

General Comments

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Mark J Aplin	Employment	Comment	Support overall approach, but on Barnwood Road sites its location and current use demand a higher quality solution with good local amenity and urban design ambition.		Comment noted. Agree that a high quality landmark scheme is needed in these locations. This is reflected in the preferred option policies for both sites.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Employment	Comment	Agree with the statement at paragraph 7.5 – namely the importance of planning employment sites carefully as a result of the significant economic implications of such choices.		Comment noted. No change.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Employment	Comment	Kayterm is concerned that employment sites are protected in order to maintain a good supply of land to support economic growth. Existing employment sites should not therefore be de-allocated, or re-allocated for alternative uses, unless clear reasons for such a change are demonstrated through		Agree that employment sites should be retained where they are needed. This approach is reflected in the Core Strategy and Development Control Policies DPDs.

			rigorous assessment.		
Government Office for the South West – Paragraph 7.2	Employment	Comment	This section may be a little misleading as it focuses heavily on the adopted Structure Plan. It should ideally make reference to the likelihood that Gloucester will require more employment than identified in the adopted SP, based on evidence from the Third Alteration EIP, emerging JSA and RSS work.		Agree. Amend text to refer to the employment/job based requirements of the draft Regional Spatial Strategy for the South West.
Graham Parkes for Tweedale on behalf of IM Group Limited	Employment	Comment	Please see comments made regarding IM Group site.		See response to other comment.
Robert Niblett on behalf of Gloucestershire County Council	Employment	Comment	Paragraph 7.4 sets out an estimated land shortfall of 31.4 hectares compared to the remaining adopted Gloucester Structure Plan requirement up to 2011. Hence existing employment sites should be protected wherever possible. It is acknowledged that the proximity of some employment uses to housing may create disturbance but retaining a choice of sites is important in fulfilling sustainable development objectives.		Agree that the retention of a choice of employment sites is a key issue. This is recognised in the Core Strategy DPD.

Ian Manning, Managing Director, Stagecoach West	Employment	Comment	Locating new facilities in peripheral industrial estates which are not on or immediately adjacent to high frequency bus corridors almost guarantees car traffic growth and peak hour congestion and needs to be avoided at all costs.		<p>Agree that new employment provision should be provided in locations that are accessible by a choice of means of transport. This is reflected in the Core Strategy DPD.</p> <p>Where appropriate the Council will, in permitting development, require appropriate enhancements to be made to encourage non-car modes of transport such as walking, cycling and public transport.</p>
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Existing Employment Allocations

- South West Bypass Site
- IM Group Site, North of Naas Lane
- Land South of the Junction between Eastern Avenue and Barnwood Road
- Land East of Waterwells Business Park

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Peter Wray on behalf of the	IM Group Site, North of Naas	Object	Maintain objection raised at Local Plan 2002 stage – due to their		Refer earlier response.

Highways Agency	Lane		close proximity to M5 Junction 12.		
Peter Wray on behalf of the Highways Agency	Land East of Waterwells Business Park	Object	Maintain objection raised at Local Plan 2002 stage – due to their close proximity to M5 Junction 12.		Refer earlier response.
Government Office for the South West	Land East of Waterwells Business Park – Paragraph 7.11	Comment	How many houses are located on this land and what would be the consequences for the current inhabitants if the site were to be identified for employment only use.		<p>The site is allocated for B1 employment use which can occur alongside residential development with no loss of amenity.</p> <p>The various options for this site have been explored through the preparation of the preferred option document and a separate supplementary planning brief document for this area. The landowners will be fully involved in initial and ongoing consultation over the potential development of this area.</p>
Graham Parkes for Tweedale on behalf of IM Group Limited	Land East of Waterwells Business Park	Comment	Part of this land is owned by our clients who originally intended that it be utilised for the expansion of their existing car distribution centre to the north of Naas Lane.		Disagree. The site is not considered appropriate for B2 and B8 purposes. The focus of B2 uses is the canal corridor. No

			<p>Consider that any proposed allocations on this land should also include those employment uses that fall within the B2 and B8 Use Classes – in addition to B1. Previously representations have been submitted to the Drat Local Plan along these lines.</p> <p>See representations made on the Housing section Tweedale on behalf of IM Group Limited.</p>		change.
Mr N. Hartshorne	Land East of Waterwells Business Park	Object	<p>With regard to the Employment Allocation (extension to Waterwells), which includes our home of 1 Brooklyn Villas, Naas Lane, Quedgeley, we suggest that if any development whatsoever is to take place it should be of a residential nature and not commercial.</p> <p>We believe that GCC is pushing too far onto the urban fringe with Industrial Units and with the current climate of increased car usage we feel you should be making more effort to retain existing employment sites within the city, where people can commute to work via cycles or public transport, instead of selling existing employment sites off to the highest bidder for residential use.</p> <p>The impact of forcing all the</p>		<p>Having regard to the potential oversupply of housing land it is considered appropriate to allocate this site for residential development.</p> <p>The provision of employment land will create additional job opportunities.</p> <p>Existing employment land in the City will be safeguarded in line with relevant LDF policies.</p>

			<p>employment to the outside of Gloucester city is taking away the community spirit as people leave their homes in their cars and return in their cars.</p>		
<p>Ceri Porter on behalf of the Environment Agency</p>	<p>Existing Employment Allocations</p>	<p>Support</p>	<p>We agree with the South West Bypass allocation however any surface water discharge from the site must be treated given the proximity of land drains to the site.</p> <p>Both the IM Group site and Land East of Waterwells Business Park would also require any surface water discharge from the site to be treated and appropriate foul water provisions made.</p> <p>The IM Group site would also require a desk study and site investigation to be carried out prior to determination of any planning application.</p>		<p>Comments noted. Amend text accordingly.</p>

Land Adjacent to Walls Factory, West of A40 (suggested for employment)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Signet Planning representing Peveril Securities Limited, development partner of Unilever Ice Cream and Frozen Foods	Land Adjacent to Walls Factory, West of A40	Support	<p>No objection to this site which is owned by Unilever as being suitable for employment (B1 and B2 uses).</p> <p>Suggest that there are further opportunities for development both on this site and also land immediately to the south which is also in Unilever's ownership. It is currently a car park that could be relocated within Unilever's retained land.</p> <p>More information and a map provided.</p>		<p>Support noted. Agree that the larger area suggested should be identified for employment use subject to the provision of significant public transport infrastructure by way of a link to the proposed high speed bus link from the new Parkway Station at Elmbridge.</p> <p>The site is not considered suitable for other uses such as commercial leisure. In accordance with Government policy and in the interests of maintaining the vitality and viability of the City Centre, we will steer such uses into the City Centre.</p>
Alistair Goldie on behalf of the Campaign to	Land Adjacent to Walls Factory, West	Support	This would seem an appropriate site for employment being sustainable as it is not to far from		Support noted.

Protect Rural England (CPRE)	of A40		housing and has good transport links.		
Mark J Aplin	Land adjacent to Walls Factory, West of A40	Object	<p>Object to any significant B1 element. Too intense a use for this location. There must be sequentially preferable office locations. The out-of-town office complex here is large enough already, and the highways situation heightens the unsustainable nature of many trips to this area.</p> <p>A mix is preferable, and B8 or small leisure.</p>		<p>Disagree. The site is not considered suitable for B8 storage and warehousing. This would significantly reduce the density of development possible in this location. There are better locations for large scale B8 uses.</p> <p>Although there are other sites suitable for B1 uses in the City Centre, it is important that a balanced range of sites is provided in order to meet the employment requirements of the RSS. It is not considered that the provision of B1 uses in this location will in any way undermine the provision of B1 office accommodation in the City Centre.</p> <p>The site is not considered suitable for leisure uses. These will be steered towards the City Centre unless there are no sites available and then will be</p>

					<p>located in edge of centre, not out of centre locations.</p> <p>Development of the site for employment use will be subject to significant public transport infrastructure provision in order to reduce dependence on the car in this peripheral location.</p>
Peter Wray on behalf of the Highways Agency	Land adjacent to Walls Factory, West of A40	Object	Concern regarding any detrimental impact this may have on the safety of the A40.		<p>The development of this site for employment use would be subject to a detailed Transport Assessment and Transport Plan.</p> <p>Appropriate mitigation would be required where appropriate. No change.</p>
Government Office for the South West	Land adjacent to Walls Factory, West of A40	Comment	Is the land adjacent to the Walls factory still owned/needed by the Walls Company? What do your highways colleagues think of this site in terms of accessibility and can any problems be realistically rectified.		<p>The site is owned by Unilever who in their representations have supported the principle of new employment development in this location.</p> <p>The development of the</p>

					site for employment will be dependent on the provision of significant public transport infrastructure improvements in order to improve the accessibility of the site by non car modes of transport.
Ceri Porter on behalf of the Environment Agency	Land adjacent to Walls Factory, West of A40	Comment	<p>This site is located on a minor aquifer and the Horsebere Brook to the east has a very high water quality. Accordingly, all surface water discharge should be attenuated and treated through an appropriate SUDS system. As the site is over 5 hectares, surface water disposal details should be submitted as a Flood Risk Assessment for any proposal.</p> <p>With the adjacent Walls Factory site and railway line, a desk study for potential land contamination should be completed as a minimum.</p> <p>We also assume that the area of identified nature conservation importance incorporates the Horsebere brook and its associated land.</p>		Comment noted. The requirement for treatment through sustainable drainage is recognised in the text of the preferred option policy as is the need to consider potential contamination as part of any planning application.

Other Sites (for employment)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Signet Planning representing Peveril Securities Limited, development partner of Unilever Ice Cream and Frozen Foods	Land Adjacent to Walls Factory, West of A40	Support	<p>Suggest that there are further opportunities for development on land immediately to the south which of land adjacent to the Walls factory (also in Unilever's ownership). It is currently a car park that could be relocated within Unilever's retained land.</p> <p>More information and a map provided.</p> <p>The Gloucestershire Local Transport Plan (Appendix J) includes plans for a new multi-modal transport interchange at Elmbridge Court which includes proposals for a bus lane through Unilever's land which will serve the park and ride site adjacent to the proposed new parkway station. Therefore the accessibility of Unilever's land will be significantly increased and therefore the opportunities for development not just for employment uses should be considered further</p> <p>Therefore this site and the already</p>		<p>Support noted. Agree that the larger area suggested should be identified for employment use subject to the provision of significant public transport infrastructure by way of a link to the proposed high speed bus link from the new Parkway Station at Elmbridge.</p> <p>The site is not considered suitable for other uses such as commercial leisure or retail development. In accordance with Government policy and in the interests of maintaining the vitality and viability of the City Centre, we will steer such uses into the City Centre.</p> <p>New retail development in this location creates the potential to harm the</p>

			proposed land adjacent to Walls factory should be combined and allocated for a mixed-use development. Suggest it would be worth considering the suitability of the site for leisure purposes and potentially also retail – particularly as the land to the south already has a number of commercial uses.		preferred location for major new retail development at the Bus Station (refer Central Area Action Plan).
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MIXED-USE

General Comments

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Mixed-use Development	Support	Stress importance of maintaining a good supply of employment land. Where sites are identified for employment uses, whether in whole or as part of a mixed-use scheme, we are concerned that the allocated employment use is included within any development proposals in order to maintain an adequate supply of land to support economic growth.		Comment noted. The importance of balancing new housing with employment opportunities in the interests of creating sustainable communities is fully recognised.

Existing Mixed-use Allocations

Land at Junction of Barnwood Road and Barnwood Bypass

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Carpenter Planning Consultants representing Peregrine Gloucester Limited	Land at Junction of Barnwood Road and Barnwood Bypass	Support	<p>Please read previous representations.</p> <p>Strongly believe that a mixed-use approach to this site is the most beneficial – preferred mix being a residential scheme and additional office space. It is a sustainable site where a mixed-use development would compliment the surrounding land uses and provide good transport links to the city centre.</p> <p>An allocation for mixed-use would be compliant with national Planning Policy Guidance including PPS1, PPg3, PPG4 and PPG13 – and also that outlined in the 2002 Second Stage Deposit Draft Local Plan.</p> <p>Also under the ownership of Peregrine Gloucester Limited is the derelict former private playing fields to the north of Saw Mills End.</p>		Support for mixed-use development in this location noted.

			<p>The incorporation of the wider site in the allocation to include the playing field allows the opportunity to reinstate the open space facility. However it is felt that the Council should allow sustainable development that does not prejudice the use of part of the site for sports purposes in return for Peregrine Gloucester's provision of this resource.</p>		
<p>Carpenter Planning Consultants representing Peregrine Gloucester Limited</p>	<p>Land at Junction of Barnwood Road and Barnwood Bypass</p>	<p>Object</p>	<p>The mixed-use allocation in the local plan expects that a significant landmark building should occupy the site nearest the roundabout. We believe this requires greater clarification. The County Council is unwilling to sell a key triangular section of land which constrains any building proposal to achieve a 'landmark' status. Such a proposal is further compromised by the existing residential properties (105 and 107) on Barnwood Road. There is a need therefore to balance the need for an imposing building against the requirement to protect the amenities of these nearby residential properties.</p> <p>Suggest therefore that the term 'landmark' should be erased and replaced from any policy or supporting text relating to this site.</p>		<p>Disagree. This is a prominent site and land ownership issues aside it is considered that through an innovative design, the provision of a landmark building is fully achievable and desirable in this location.</p>

			<p>As an alternative, we suggest that the term 'well-designed' should be used to replace it.</p> <p>In relation to the occupiers of 105 and 107 Barnwood Road, it is our view that while the amenities of the residents should be treated with respect, such protection should not dominate the redevelopment of this particular site.</p>		
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Land at Junction of Barnwood Road and Barnwood Bypass	Support	Support current allocation but not something like a service station as has been proposed in the past.		Comment noted. The allocation does not include provision for a new service station.
Peacock and Smith on behalf of W M Morrison Supermarkets Plc	Land at Junction of Barnwood Road and Barnwood Bypass	Object	<p>WM Morrison Supermarkets Plc generally supports the mixed-use approach to the redevelopment of the 1.3-hectare site on land at junction of Barnwood Road and Barnwood Bypass.</p> <p>However they consider that the policy/site allocation relating to this site should confirm that any retail element for the new local shopping centre should be of an appropriate scale for a local centre in accordance with the description of</p>	Suggest that the allocation should identify the broad scale and range of uses acceptable in the new local centre, and provide policies that ensure that facilities at the new centre are at a scale to serve local needs only and do not have any significant adverse effects on the hierarchy of existing town, district, and local centres in Gloucester.	Agree in part. Amend text to emphasise that new retail development in this location will be of a scale that is appropriate to a local centre in order to ensure that they do not compete unreasonably with other local or district centres or the City Centre.

			local centres as identified in Annex A PPS 6.		
Ceri Porter on behalf of the Environment Agency	Land at Junction of Barnwood Road and Barnwood Bypass	Comment	This site should be subject to a site investigation for potential land contamination as the site is located upon a minor aquifer and there is a petrol filling station on site.		Comment noted. Amend text of policy accordingly.

Former B&Q Premises (suggested for mixed-use)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
MWA representing New Star Asset Management Limited	Former B&Q Premises – Paragraphs 8.5 – 8.11	Object	<p>The site has a well-established retail use. The relocation of B&Q to a new store at the cattlemarket does not provide sufficient justification for seeking to redevelop the site for a mix of uses.</p> <p>The Barton Street local centre immediately adjoins the site and the primary shopping area is being considered for expansion to adjoin the opposite side of Trier Way. The vacant store provides an opportunity to redevelop the site for a modern range of shop units</p>		<p>The provision of additional open A1 retail in this location has the potential to compete not only with the City Centre but also with the Barton Street Local Centre which the site adjoins.</p> <p>The site is currently restricted to the sale of bulky DIY products in order to ensure that it does not compete with these centres.</p>

			<p>which would support both the local centre and encourage linked trips to and from the city centre. Moreover paragraph 8.8 recognises the site is well located to nearby housing, is close to existing shops, and is accessible by a range of transport modes.</p> <p>There is no demand for additional office floorspace in the central area. There is no evidence to support the statement that housing and offices would generate more potential customers than a new retail scheme. The use of the site as a 'park and walk' car park is both unrealistic and unnecessary, given its lawful Class A1 use.</p>		<p>Permitting a broader range of goods to be sold will reduce the capacity available to support new retail floorspace within the Primary Shopping Area and is likely to have a detrimental impact on the vitality of both Barton Street Local Centre and the City Centre.</p> <p>The preferred option for this site is therefore housing, employment and small scale retail development along Barton Street. This will compliment the role of the Local Centre rather than compete with it.</p>
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Former B&Q Premises	Support	In view of the apparent success of the ice rink in Kings Square how about an ice rink? It is close to GL1 and has parking.		<p>Comment noted. There is however no identified demand for a permanent ice rink in Gloucester.</p> <p>The site is considered suitable for mixed-use development and this is reflected in the preferred draft policy for this site.</p>

Mark J Aplin	Former B&Q Premises	Object	<p>Object to designation for public parking. Perhaps its viability as an edge of centre retail site should be tested first. Development should be mixed with residential.</p> <ul style="list-style-type: none"> • Not convinced that the need exists for offices, but no outright objection if demand clear 		<p>Comments noted. The site is considered suitable for parking given its proximity to the Primary Shopping Area and the ability of people to walk to and from the site relatively easily.</p> <p>As an edge of centre site, any retail use should continue to be restricted to bulky goods in order to avoid potential impact on new retail schemes coming forward within the Primary Shopping Area.</p>
Government Office for the South West	Former B&Q Premises – Paragraph 8.11	Comment	<p>How would a 'park and walk' facility fit within the LTP programme? Has this requirement already been identified for this area and would the existing pedestrian route into the Centre require further works to make it more successful?</p>		<p>Park and walk is a key aspect of the GHURC regeneration framework. In preparing the document, the GHURC have liaised closely with the County Council in relation to the transport strategy.</p>
Pat Roberts	Former B&Q Premises	Support	<p>Redevelop. Less retail and some parking.</p>		<p>Comment noted. The preferred option is for mixed-use development</p>

					including public parking.
Nathaniel Lichfield and Partners for Cavanna Homes (South West) Limited	Former B&Q Premises	Support	<p>B&Q Plc are the leaseholders of the former B&Q store on the corner of Barton Street. The premises are currently vacant whilst B&Q seek to agree terms with a replacement retailer – with the intention being that the replacement retailer will be of a type and status that can help to contribute to the retail landscape of Gloucester, from this edge of centre location.</p> <p>Notwithstanding the above, B&Q support the identification of the site as having redevelopment potential, although that potential should not prejudice any decision that may need to be made about the future retailer occupier of the existing building.</p> <p>The sites characteristics and accessibility credentials clearly offer the opportunity for mixed-use development at high density. Retail, residential and offices would appear appropriate uses.</p>		Support for mixed-use development in this location noted.

Morelands Trading Estate (suggested for mixed-use)

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Morelands Trading Estate	Support	Closely located to housing, this should continue to be used for employment, with more, if capacity permits.		Comment noted. Having regard to the City's housing requirement set out in the RSS, and the need to provide a balanced mix of housing and employment opportunities, it is agreed that this site should be retained in its current employment use, providing a useful source of flexible, managed workspace. The site has therefore not been identified in the preferred option paper.
Mark J Aplin	Morelands Trading Estate	Object	<p>Redevelopment should not be encouraged as long as occupied, other sites remain vacant and lack of clarity about structural requirements for B-class in the city remain.</p> <ul style="list-style-type: none"> Accept it may hold long-term mixed-use potential 		Comment noted. Having regard to the City's housing requirement set out in the RSS, and the need to provide a balanced mix of housing and employment opportunities, it is agreed that this site should be

			but retention and sympathetic conversion of significant buildings should be integral to considering the balancing of uses.		retained in its current employment use, providing a useful source of flexible, managed workspace. The site has therefore not been identified in the preferred option paper.
Peter Iles	Morelands Trading Estate	Object	The costs that would be involved in moving to an alternative site could not be covered by own expense as only make a modest income as a sole trader. It could therefore, close my business.		Comment noted. Having regard to the City's housing requirement set out in the RSS, and the need to provide a balanced mix of housing and employment opportunities, it is agreed that this site should be retained in its current employment use, providing a useful source of flexible, managed workspace. The site has therefore not been identified in the preferred option paper.
Pat Roberts	Morelands Trading Estate	Comment	If the triangle next to Morelands Trading Estate is taken up with housing Morelands should continue as an employment site.		Comment noted. Having regard to the City's housing requirement set out in the RSS, and the need to provide a balanced mix of housing

					and employment opportunities, it is agreed that this site should be retained in its current employment use, providing a useful source of flexible, managed workspace. The site has therefore not been identified in the preferred option paper.
Ceri Porter on behalf of the Environment Agency	Morelands Trading Estate	Comment	A desk study should be carried out for this longstanding factory site.		Comment noted. Having regard to the City's housing requirement set out in the RSS, and the need to provide a balanced mix of housing and employment opportunities, it is agreed that this site should be retained in its current employment use, providing a useful source of flexible, managed workspace. The site has therefore not been identified in the preferred option paper.

Transport

- Cycle Routes
- New Railway Station and Rail Freight Terminal
- Bus Priority

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Arthur Daley	Quedgeley Rail Freight	Support	The rail freight depot should be retained as this gives greater flexibility in use and would contribute to the mixed-use of land. This could increase sustainability.		<p>Comment noted. However the County Council have confirmed that the prohibitive costs of introducing a rail freight terminal in this location mean that it is unlikely to happen. As a result, it is considered inappropriate to continue to identify the site.</p> <p>The site has therefore not been identified in the preferred option draft document.</p>
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Cycle Routes	Support	These are useful for newcomers to cycling and cause drivers to be aware of them. Where cycle routes do not have a reasonably safe on road alternative, then the		Comment noted.

			<p>cycle routes should be protected.</p> <p>The cycle route from Priory Road/St Oswalds Road to Westgate Bridge and boating lake should be a designated cycle route. This would connect with those into the city from Westgate Bridge and beyond.</p>		
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	New Railway Station	Support	<p>It makes more sense to locate a passenger station south of Naas Lane as the majority of the population of Gloucester live closer to there than Barnwood or at least have choices of route to the existing Gloucester Rail (and bus) station. This is also a reason why there should be no Gloucestershire Parkway Rail Station at Barnwood. Virtually no-one would be able to walk or cycle to it.</p>		<p>The preferred location for a new passenger station is Elmbridge Court. This is identified as a major project in the Local Transport Plan.</p>
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Bus Priority	Support	<p>Bus Priority measures are to be encouraged as they will improve the bus service and therefore attract people out of their cars and onto the buses.</p>		<p>Support noted.</p>
Mark J Aplin	Transport	Support	<p>Support.</p>		<p>Support noted.</p>

Mark J Aplin	Quedgeley Rail	Object	Object to the deletion of the rail freight proposals on basis of details provided. How have 'prohibitive costs' been tested and what has changed.		The County Council have tested this site as an option and have concluded that the cost of developing the rail freight terminal in this location are prohibitive. For this reason, the site has not been identified in the preferred option draft document.
Mark J Aplin	Passenger Rail Station	Support	Support.		Support noted.
Mark J Aplin	Bus Priority	Support	Support		Support noted.
Peter Wray on behalf of the Highways Agency	Transport	Support	Note that these policies include 'upgrading and enhancing the local and strategic road network including the completion of the inner relief road and South West Bypass', 'reducing the need to travel' and 'promoting greater use of public transport, walking and cycling'. Support these objectives as they may have a positive effect on the network.		Support noted.

Peter Wray on behalf of the Highways Agency	Transport	Support	Support policies in respect of cycling, provision of rail facilities and bus priority measures. Would appreciate being consulted about the measures as developed.		Support noted. Further consultation will take place as schemes are introduced.
Jennifer Hainsworth for Barton Willmore Planning on behalf of Kayterm Plc	Transport	Comment	Appendix 11 includes incorrect information.		The bus priority routes have been checked and updated.
Jen Tempest for G L Hearn on behalf of the Director of Property and Medical Engineering for the Gloucestershire Hospitals NHS Foundation Trust	Parking	Comment	The hospital is continually monitoring and assessing the need for car parking on the hospital site. Car parking requirements for the hospital will continue to be discussed the Council as the Trust aim to resolve current problems associated with the scale of operational demand and the potential loss of off-site spaces.		Comment noted.
Jen Tempest for G L Hearn on behalf of the Director of Property and Medical Engineering for the Gloucestershire Hospitals NHS Foundation Trust	Linked Bus and Rail Facility	Support	The Trust supports a linked bus and rail facility in proximity to the existing City Centre Rail Station. The current pedestrian route from the hospital to the railway station is via an unattractive underpass – the Trust has made financial contributions towards improving this route but no work has started		Support noted. The provision of enhanced pedestrian links in this area will be considered through the Area Action Plan process and the allocation of the area around the bus station for significant new retail

			on this project. The need to improve this route and investigate alternatives, whilst it should form part of any major rail and bus improvements, should not be dependent upon waiting for such facilities to be provided.		development.
Jen Tempest for G L Hearn on behalf of the Director of Property and Medical Engineering for the Gloucestershire Hospitals NHS Foundation Trust	Cycle Routes	Support	The Trust supports the designation and protection of cycle routes.		Support noted.
Jen Tempest for G L Hearn on behalf of the Director of Property and Medical Engineering for the Gloucestershire Hospitals NHS Foundation Trust	Bus Priority Measures	Support	The Trust supports bus priority measures. It plans to encourage the use of London Road public transport routes and is looking at ways that the hospital can link with London Road more effectively.		Support noted.
G R W Bown	Transport	Comment	Although we use a car as a family we use public transport to a great extent. Bringing back a greater range of train services to the city would be one of my priorities. The		Support noted. Suggested new route noted. This will be considered further.

			<p>greater provision of cycle paths has been a real boon.</p> <p>What about a cycle path from the city to Ashleworth to open up the north of the river?</p>		
Government Office for the South West	New Railway Station and Rail Freight Terminal	Comment	<p>Can the prohibitive costs in delivering the rail freight terminal be overcome? What will the impact be on the Transport Plan/S106 of the original application if this facility is not provided? What are the possible alternatives for this site?</p>		<p>The County Council have confirmed that the prohibitive costs associated with a rail terminal in this location cannot be overcome.</p> <p>It is likely that the site will come forward for residential development as part of the RAFQ development. Any application for further residential development in this location will be considered on its merits.</p>
Graham J Parkes for Tweedale on behalf of IM Properties Plc	Rail Freight Terminal	Comment	<p>See comments made with regard to housing – general comments.</p>		<p>See response to housing comments.</p>
Pat Roberts	Cycling	Support	<p>Gloucester is a perfect city for cycling – compact and flat. Many of the existing routes are primarily</p>		<p>Comment noted. The need to provide quality facilities for cyclists is</p>

			<p>traffic calming measures rather than a serious attempt to encourage cycling. The City would benefit from a total overhaul of its provision and better linkages with its accessible countryside, especially across and down the river.</p>		<p>fully acknowledged. New routes will be identified as appropriate.</p>
Pat Roberts	New Railway Station and Rail Freight Terminal	Support	<p>Agree with the deletion of the rail freight proposal at RAF Quedgeley</p> <p>Agree with the retention of the proposed passenger rail station south of Naas Lane.</p>		<p>Support noted. The proposed passenger rail station has not been identified in the preferred option consultation document based on discussions with the County Council and emerging proposals for a new parkway station at Elmbridge.</p>
Ian Manning, Managing Director, Stagecoach West	Bus Priority	Support	<p>If bus priority measures are not implemented quickly to high quality specification the network will start to wither. Stagecoach grew its Gloucester based network by 6.8% in 2004 when compared to 2003 but for 2005, the growth has reduced to 1.9% which is still an excellent achievement when compared to the national provincial figure of a 1% loss of patronage, but in our view shows how the</p>		<p>Support for bus priority measures noted. These will be implemented where possible and achievable.</p> <p>Broad support for bus priority is set out in the Local Transport Plan although no specific proposals are put forward.</p>

			<p>growth has slowed due to the failure to implement any single bus priority measure in the County in 2005.</p> <p>We therefore wholeheartedly support the most rapid introduction of new bus priority measures which will significantly reduce journey times and enhance the attractiveness of a bus as an alternative to the car. In many cases the cost is minimal and if all the traffic signals which were capable of transponder detection were simply bought up to standard and activated, this would make an immediate difference. Much of the rest is white paint and it needs to be grasped that in some instances there will be disbenefits to car traffic.</p>		
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Flooding

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Flooding	Support	In view of climate change and the unknown effects of the South West Bypass, it would be very prudent to work and listen to the Environment Agency erring on expanding the boundary.		Support noted.
Andrew Jones for the Barton Willmore Planning Partnership on behalf of Taylor Woodrow Strategic Developments and Brasenose College	Flooding	Support	We acknowledge the importance and potential impact of flooding within the city. Accordingly as supporters of the potential development at Frogcastle Farm our clients have already undertaken extensive investigations including recent discussions with the environment agency. Our clients are therefore confident that issues of potential flooding affecting Frogcastle Farm can be resolved through appropriate compensation and mitigation works and does not represent a barrier to residential development.		Comment noted. However based on the advice of the Environment Agency, and having regard to the City's housing requirements and availability of brownfield sites, land at Frogcastle Farm has not been allocated in the preferred option document.

<p>Ceri Porter on behalf of the Environment Agency</p>	<p>Flooding, Paragraph 10.1</p>	<p>Comment</p>	<p>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 identified within its Key Planning Objectives that LPA's should prepare and implement planning strategies to help deliver sustainable development by preparing Strategic Flood Risk Assessments. These should be 'appropriate either as part of the sustainability appraisal or as a free-standing assessment that contributes to that appraisal'.</p> <p>Paragraph 10.1 of the Site Allocations and Designations document accepts that a significant part of the City lies within the floodplain of the River Severn but does not recognise the flood zones that cover the City as a whole.</p>	<p>Other floodplains affect Gloucester therefore the specific reference to the Severn should be removed or other floodplains included. It should also be noted that appendix 12 does not illustrate the extent of all the floodplains within Gloucester.</p> <p>Appendix 12 should therefore show all the floodplains as identified on our latest Flood Zone maps.</p> <p>The accompanying sustainability appraisal for this document should include a Strategic Flood Risk Assessment to influence the development options available.</p>	<p>Comments noted. Delete specific reference to the River Severn and refer to the existence of other smaller floodplains across the City.</p> <p>Amend Proposals Map to show all floodplains.</p> <p>Flood risk appraisal has been incorporated into the sustainability appraisal that has been carried out on this document.</p>
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District and Local Centres

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Arthur Daley	Local Centres	Support	Local Centres should provide more than one shop selling similar goods e.g. a supermarket selling meat should compete with a butcher.		Comment noted. The need for diversity within local and district centres is fully recognised and the proportion of different uses will be controlled in order to maintain diversity.
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	District and Local Centres	Object		Should include Kingsholm Road as a local centre having a Post Office and local shop that continues to battle against Tesco's at the old Cattle Market. There is also pubs, a pharmacy, surgery, church and rugby ground.	Comment noted. This area has been included in the preferred option document for discussion purposes.
Mark J Aplin	Local Centres	Support	Strongly support strengthening the policy on this important matter. Expansion of network in increasingly needed and can be justified under PPS 6. <ul style="list-style-type: none"> • Feel 70% as A-class is 		Comment noted. The need for diversity within local and district centres is fully recognised and the proportion of different uses will be controlled in order to maintain

			<p>somewhat low. A diversity of A-class and some local D1 should be allowed around a majority A1. Restrict A4 and A5.</p> <ul style="list-style-type: none"> Residential at ground floor should be prohibited. Test for release from A1 should be over substantial vacancy period e.g. 18 months plus. 		diversity.
Peacock and Smith on behalf of W M Morrison Supermarkets Plc	Paragraph 11.4 – Hierarchy of Existing District and Local Centres	Support	<p>Support the identification of Abbeymead as a district centre.</p> <p>W M Morrison Supermarkets Plc are the operators of the Anchor Food Superstore at the Abbeymead district centre and support future policies which seek to maintain the health of the centre.</p>		Support noted.
Pat Roberts	District and Local Centres	Support	Agree with all questions asked.		Support noted.
Suzy Birdseye on behalf of Hallam Land Management	District and Local Centres	Support	District and Local Centres – We support the emphasis placed by the Council on the district and local centres, especially those located at Windsor Drive, Seventh Avenue and Quedgeley, and the approach to maintain the health of these		Support noted.

			centres. We agree that it is important that these centres are maintained to act as a focal point for the community and to encourage people to access these centres without relying on a car.		
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	District and Local Centre	Object	The County Council owns the site reserved for library use adjacent to the Abbeymead food retail store. Its allocation for residential use should be made to protect the opportunities for realising community benefits by providing a new library in a shop unit as part of the redeveloped food store.		A response on this site is set out in full in the draft site allocations document. Please refer.

Community Provision

- Land at Lobleys Drive (open space) – reserved for new community building
- Land off Abbeymead Avenue – reserved for new library
- Land off Abbeymead Avenue – reserved for new police station
- Land off Wheatridge East – reserved for new primary school
- Land at Clearwater Drive – reserved for new primary school
- Other sites

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Community Provision	Support	These should be encouraged as they obviate the need to travel when people can walk or cycle (healthy) to these facilities.		Support noted.
Government Office for the South West	Community Provision	Comment	There doesn't seem to be any reference to religious facilities. What evidence base has been used to establish the identified needs?		This issue has not been considered.
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Community Provision	Object	Object to any of the sites in Appendix 14 being allocated solely for new community facilities. The County Council maintains its representations to the Gloucester Second Stage Deposit Local Plan 2002 in respect of policies B.2, CS.9, and OS.7 – extracts		See previous response.

			provided as appendices.		
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Clearwater Drive	Comment	<p>The Clearwater Drive site extends to 2.1 hectares, offers little amenity to the area and is a site awaiting development. It is uneven and surrounded by residential properties and the Gloucester and Sharpness Canal. It adjoins unfenced City Council owned public open space. It is allocated for educational use, access is permissive and it is not public open space.</p> <p>Most of the surrounding development has been built quite recently but without the provision of public open space. No information is available as to why developers were not required to make adequate provision. The County Council paid full residential open market value for the site in 1990 and it is the subject of pre-emption rights in favour of the original developer owner.</p> <p>The City Council's Issues and Options consultation paper (Site Allocations and Designations) questions whether housing development should be considered on part of the site if the remainder of the site were to be dedicated as public open space. This indicates</p>		<p>Comment noted. It is recognised that this site has the potential to provide limited amount of new housing with a good proportion of the site retained for public open space. This is reflected in the preferred option draft policy for the site and the development brief which has been prepared separately.</p>

			<p>a willingness to consider the possibility of part of the site being developed. This is consistent with the allocation for a primary school as by making the allocation it is accepted that it would be acceptable in planning terms for part of the site to be used for built development.</p> <p>We submit that: -</p> <ul style="list-style-type: none">• In the short term the County Council will produce a feasibility assessment showing how the land should be used• Agreement should be reached on the principle that part of the site can be developed for housing• The remainder to be enhanced as public open space• The most appropriate area to develop is the eastern part• A planning brief should be prepared for the site, defining the area for development, the contribution for creating and laying out the public open space and a commuted maintenance		
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			<p>sum</p> <ul style="list-style-type: none"> • The contribution should be applied to create an area of high quality public open space • Notwithstanding our comments above, it will also be desirable to retain at least part of the site as a natural greenspace 		
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Former Secondary School land at Paygrove Lane	Comment	<p>The Longlevens area is fairly densely developed, albeit with generally two story houses and some other buildings. The site is about 2.36 hectares. There is no vehicular access although one could be created off Paygrove Lane. It is roughly circular with a diameter of approximately 120 – 130 metres. There is currently no public access to it and is a featureless and uninteresting greenspace. It is not a public amenity but has some visual value in terms of openness in a developed area.</p> <p>The site is fairly open to Paygrove Lane with houses on the north and east sides and the Longlevens Infant School to the south. Ten houses adjoin the northern boundary and there are about 15</p>		Land at Leven Close has been allocated for limited development of 15 dwellings with the remainder of the site to be public open space. Paygrove Lane is allocated as a neighbourhood park.

			<p>along the eastern side, although separated from the site by Horsbere Brook. All the dwellings turn their back on the site. There are some dwellings on the western side of Paygrove Lane which overlook the site.</p> <p><u>Potential of the site for use as a Neighbourhood Park or Sports Pitches</u></p> <ul style="list-style-type: none">• The site meets criteria for a neighbourhood park. It is visible with a potentially open frontage to Paygrove Lane, is of a size worth landscaping as a high quality greenspace in an undistinguished environment which lacks large trees, could have a new pedestrian route along Horsbere Brook from the housing areas to provide an attractive, traffic segregated route to and from Cheltenham road.• The adjoining infant school and nursery could use the site• The openness of the site makes it appear relatively safe• The site could		
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			<p>accommodate a single adult football pitch, two junior school pitches or a number of mini-soccer pitches. However its shape and dimensions mean that an adult football pitch would make very inefficient use of the land available.</p> <ul style="list-style-type: none">• Using the site for junior or mini soccer makes better use of the land than an adult pitch, but would still be fairly inefficient in terms of using the space available to best effect and would leave some minor surplus area. <p>A changing pavilion on the Paygrove Lane boundary would require a third or more of the open frontage. This will significantly reduce the visual amenity of the site. If a car park is also provided the site will become hidden away behind buildings or parked cars.</p> <p>This site has potential to be developed as a valuable and attractive neighbourhood park. It is less desirable for permanent pitches but if developed as a park it could easily be used for mini-</p>		
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		<p>soccer. This will require a simple shelter for players rather than full changing accommodation, as it is common for children attending training or matches to be already changed</p> <p><u>Development of the site for housing</u></p> <p>The northern part of the former secondary school has already been developed for housing. The remainder of the site could be developed in the same way, although this will be less desirable as it is one of the few opportunities to create a worthwhile greenspace in the area.</p> <p>However some limited housing should readily be accommodated on the land to provide the necessary funding and supervision of the area. At the moment all fringe development with the exception of that on Paygrove Lane turns it back on the site. This would give the passive observation that is an essential feature in creating a safe and successful Neighbourhood Park.</p> <p>The County Council will shortly produce a feasibility study for the development of the site.</p>		
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			<p><u>Funding the development of pitches or a park</u></p> <p>Whilst it is not the role of the County Council to provide, manage and maintain either public use pitches (except when it can promote the dual use of school facilities) or public open space, through careful redevelopment of these surplus landholdings, it could create significant opportunities to generate new public facilities. We see an option for joint working with the City Council to produce the necessary funding to significantly increase the amount and quality of local open space and recreational areas.</p> <p>We submit that: -</p> <ul style="list-style-type: none">• The site be allocated for (a) Neighbourhood Park incorporating mini-pitches and (b) residential use• Community consultation be undertaken on the Neighbourhood Park to comply with PPG 17• A development brief be prepared showing how the site will be landscaped as a park and used for		
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			<p>recreation and limited housing</p> <ul style="list-style-type: none"> Contributions to be provided from the residential development towards the creation of the Neighbourhood Park 		
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Land to the rear of Leven Close	Object	<p>The Longlevens area is fairly densely developed, albeit with generally two story houses and some other buildings. The site is 1.63 hectares and has two access points (a) off Paygrove Lane and (b) from Leven Close via the partially formed road access which stops short of the site boundary. This indicates a past intension to provide vehicular access to the site. There is no public access to the site nor is it a public amenity.</p> <p>The site is surrounded by dwellings on all sides, all of which 'turn their back' on it. It is rectangular and was acquired as a secondary school pitch but has not been used for this purpose for 16 years.</p> <p>It is not identified as a pitch in the City Council's Playing Pitch Strategy and therefore if developed for housing there will be no loss of</p>		See response above.

			<p>a pitch in the area. It would require works to make it suitable for pitch use.</p> <p>Neighbourhood parks should be highly visible by the public to make them busier and safer. This site is hidden from public view which, despite the surrounding houses, lessens its visibility and therefore public safety. It is enclosed by the surrounding dwellings and lacks the open ambience required by a park. The proximity of the housing mitigates against significant use as pitches.</p> <p>We conclude that is not a suitable for site for a neighbourhood park.</p> <p><u>Development for housing</u></p> <p>With access off Leven Close, the site should accommodate mainly housing with minor on-site informal open space. Housing has the potential to generate sufficient contributions towards the provision or enhancement of open space provision in the area.</p> <p>Alternatively the site will continue to lie idle until development becomes acceptable.</p> <p>We submit that: -</p>		
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			<ul style="list-style-type: none"> • The site be allocated for residential use • Contributions to be provided from the residential development towards the creation of (a) new recreation and public open spaces and/or (b) anew neighbourhood park. 		
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	The Wheatridge	Object	<p>This site was intended as a primary school. That use appears to appear less likely. It has informal public access and is surrounded on all sides by the backs of 40 or so houses. There is a pedestrian route along its western edge. It extends to some 2.2 hectares. The site is used unofficially for dog walking on a permissive basis.</p> <p>Development to the east of the site consists of larger properties than those to the west and there is 'creeping densification' by way of recent and continuing development in gardens.</p> <p>The only road access is on the eastern side, off the Wheatridge (east). The original developer may require the return of its interest if not used for a school. The original</p>		<p>The site is greenfield and the focus of the Core Strategy is the re-use of previously developed land and buildings within the Central Area.</p> <p>The site also offers an informal recreational resource for local residents for passive forms of recreation such as walking.</p> <p>There also remains the possibility that the site may be brought forward for educational use. The site was originally set aside to provide for a community use and the allocation of the site for housing would be</p>

			<p>developer is likely to seek consent for a residential development. The site is neither an open space nor a sports facility.</p> <p>We submit that: -</p> <ul style="list-style-type: none"> • The site be allocated for residential use • Public open space be provided on site • Contributions be provided for works to complete necessary layout works • A planning brief be issued for the site, designed to deliver a significant new greenspace along the line of the service easement and accessed from the existing north-south pedestrian route, and funded by residential development 		<p>contrary to the original community based objectives for this piece of land when the area was first planned and laid out.</p> <p>For these reasons and having regard to housing land availability elsewhere, this site has not been identified for housing and will continue to be identified for a new school.</p>
Nick Stewart on behalf of Gloucestershire County Council Resources Directorate	Blackbridge	Object	<p>We disagree with the allocation on the plan at Appendix 4 in respect of the disused allotments at Blackbridge. With reference to paragraphs 5.6 – 5.8, despite their availability, take up and use of the allotments is minimal. Ten years ago the County Council had 31 allotment holders out of a total</p>		<p>It is acknowledged that this site has the potential for mixed-use development including the retention of allotments as well as limited residential development, community provision and new GP surgery.</p>

			<p>available pool of 49. By 2005 there only two remaining allotment users, despite rents remaining largely static and being set at minimal levels.</p> <p>Part of the land is subject of proposals by the County Council for a doctors surgery and residential development.</p> <p>The allocation should be changed to recognise the shift in demand and bring the land into more viable use by re-allocating as mixed-use residential, community and allotments. We agree with the retention and/or replacement of an appropriate and relevant area for allotments to meet demand.</p> <p>The land behind the allotment area has significant potential for mixed-use development including residential and improvement of public recreation facilities. This area should be allocated as such.</p> <p>We submit that: -</p> <ul style="list-style-type: none"> • The site be allocated for mixed-use including residential, doctors surgery, allotments and community. 		<p>This is reflected in the preferred option draft policy for this site.</p>
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			<ul style="list-style-type: none"> • Public open space be provided on site. • Contributions be provided for related infrastructure including public open space and recreation. • A planning brief be developed for the whole site. 		
Mrs Debra Gills	Land at Clearwater Drive	Object	Clearwater Drive should not be subject to further housing development. This precious piece of open space is much needed and well used by the Quedgeley public. Further information provided.		The importance of public open space in Quedgeley is recognised. It is considered however that the provision of limited residential development on part of the site will help to secure the retention of the majority of the site as public open space.

Cordon Sanitaire

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Simon Read	Cordon Sanitaire	Support	Fully support the existing Cordon remaining in place. It would be unacceptable to have land within its boundary being used for any other purpose than a floodplain and agricultural use.		Support noted.
Simon Read	Cordon Sanitaire – Paragraph 13.8	Object	Oppose to the permanent placement of activities such as car boot sales and the outdoor market on grounds on increased noise, refuse, illegal parking, intrusion onto existing floodplain, and increased risk of temporary illegal dwellers. Other objections have been submitted to the planning committee.		Comment noted. The proposed uses for the land at Netheridge are however not 'permanent' and are therefore considered to be acceptable within the cordon boundary. Car boot sales and open markets for example will only take place on a few days per week. There is nothing to suggest that such uses will increase the likelihood of this site being occupied illegally.

Government Office for the South West	Cordon Sanitaire	Comment	Cordon Sanitaire appears in both the Central Area Action Plan and the Site Specific Document. It does not propose options for alternative uses not require specific actions for the site. Would this policy therefore be better placed within the DC policy document?		This is an area-based policy and is therefore included in the Site Allocations and Designations DPD. No change.
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Conservation Areas

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Response
Alistair Goldie on behalf of the Campaign to Protect Rural England (CPRE)	Conservation Areas	Support	These should be retained and nurtured. Recent developments in London Road are to be commended as they actually enhance the area.		Support noted.
Pat Roberts	Conservation Areas	Support	Agree with all questioned asked.		Support noted.

Sustainability Appraisal

<p>Robert Niblett on behalf of Gloucestershire County Council – Sustainable Transport</p>	<p>Sustainability Appraisal</p>	<p>Support</p>	<p>The sustainability appraisal appears to be comprehensive in its consideration of alternative strategies and come to reasonable conclusions.</p>		<p>Support noted.</p>
<p>Ceri Porter on behalf of the Environment Agency</p>	<p>Sustainability Appraisal – Contaminated Land</p>	<p>Comment</p>	<p>Where contamination may be suspected from previous uses, there may well be a positive outcome for many sites should remediation be carried out.</p>	<p>This potential improvement should be reflected in the objectives for the relevant proposed site allocations.</p>	<p>This issue has been reflected in the sustainability appraisal applied to the preferred option site allocations.</p>
<p>Ceri Porter on behalf of the Environment Agency</p>	<p>Sustainability Appraisal – Flood Risk</p>	<p>Comment</p>	<p>We welcome the Council's commitment to identifying the extent of the River Severn Floodplain.</p> <p>Paragraph 51 of PPG 25 states that a Local Planning Authority (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 identified within its key planning objectives that LPA's should prepare and implement planning strategies to help deliver sustainable development by</p>		<p>Comment noted. Flood risk has been incorporated into the Sustainability Appraisal of the preferred option consultation documents.</p>

			<p>preparing Strategic Flood Risk Assessments (SFRA). This should be 'appropriate either as part of the sustainability appraisal or as a free-standing assessment that contributes to that appraisal'.</p> <p>The most logical approach is to carry out a SFRA and apply a risk-based approach following the sequential test. This will allow you to identify sites for allocation and when they should be brought forward for redevelopment. Any exceptions would need to be justified robustly.</p> <p>Examples of guidance on SFRA provided.</p>		
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