

Core Strategy Issues and Options Paper (1)
Schedule of Comments by Policy

Ref. No./Name	Section/Para. No.	Support/Object	Representation	Changes Seeking	Officer Response
General Comments					
1.1. Government Office for the South West.	General comment.	Object	On occasions the impression is given that the LDF is a one off process leading to a conclusion.	Clarification that the Core Strategy is one of the first steps in an open ended process.	Agree. Revise text to emphasise that the preparation of the LDF is an ongoing process that is subject to continual review.
1.2. Government Office for the South West.	General comment.	Object	Reader asked for opinions on matters that should be informed by existing corporate strategies and a robust evidence base and/or regional and national guidance – for example housing requirements and the criteria for affordable housing.	Items such as these should be omitted as they undermine the credibility of the document and may give 'false hope' to respondents as to their sphere of influence.	Agree. Delete reference to issues that are outside the scope of local influence.

1.3. Government Office for the South West.	General comment.	Object	Sequence of the document should be improved to make it easier to follow.	Strategic Objectives should be summarised with reference to the particular action to address them, or repeated in the Strategy and Core Policies section.	Disagree. It is considered that the key issues, objectives, strategy and policies flow in a logical and easy to follow sequence. No change.
1.4. Government Office for the South West.	Paragraph 1.2.	Object		Replace 'consist of ' with 'will include the following documents' because the documents will change over time.	This paragraph has been deleted.
1.5. Government Office for the South West.	Local Policy section	Object		Include the Local Transport Plan in this section.	Agree. Insert reference to Local Transport Plan.
11.4 English Nature	General Comment - Core Policies	Object		Would like to see a Core Policy that includes the following: General criteria against which all development proposals will be tested for compatibility with	Core Policy 10 is intended to offer protection to the built and natural environment as a whole. Nature conservation will be dealt with through more specific

				<p>nature conservation objectives and/or sustainable development principles including nature conservation criterion</p> <p>Safeguards nationally and regionally/locally designated sites while making clear the relative weight to be attached to the different designations</p> <p>Protect ancient woodlands and tress of nature conservation value</p> <p>Encourages the conservation and management of features of the landscape of major importance for wild flora and fauna</p> <p>Protects species and their habitats, especially those with legal protection and those of principle importance for biodiversity conservation</p> <p>Applies the precautionary principle where necessary.</p>	<p>policies set out in the Council's Development Control Policies document.</p>
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15.1 Brian and Pamella Dean	General comment.	Support		Support for provision of more trees in the city centre.	Noted.
Key Issues					
1.6. Government Office for the South West.	Key Issues for Gloucester Point 1	Object		Replace with the following '...together with Cheltenham Gloucester is expected to accommodate the majority of the County's growth...'	Agree. Amend text as per suggested wording.
1.7. Government Office for the South West.	Key Issues for Gloucester Point 7	Object	It is not made clear how Gloucester 'is lagging behind other towns'	Provide clarification of this point.	Agree. Delete this sentence.
1.8. Government Office for the South West.	Key Issues for Gloucester Point 14	Object	It is not made clear in what respect the high percentage of black and ethnic minority groups is 'an issue'.		Agree that this is misleading. Delete reference to this issue.

<p>3.4</p> <p>Miss A C Balchin</p>	<p>Key Issues</p>	<p>Object</p>	<p>Currently there is a serious lack of co-ordination with other authorities adjoining Gloucester City. This is vitally important as development must take place here in order to accommodate Gloucester's housing targets.</p>	<p>Must work in co-operation with adjoining authorities and ensure that the City's transport infrastructure can cope with the emerging development proposals on its borders.</p>	<p>The importance of joint working is fully recognised. Amend text to refer to the need for effective co-ordination between the City Council and adjoining local authorities in meeting the housing and employment needs of the Gloucester Principal Urban Area (PUA).</p>
<p>5.1</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>Key Issues for Gloucester</p>	<p>Support</p>	<p>Support inclusion of key issue 15, 'There is a need for more affordable housing'.</p>		<p>Support noted.</p>
<p>6.1</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Key Issues for Gloucester – Issue 1</p>	<p>Support</p>	<p>Support Statement 1 – 'Gloucester is defined as a Principle Urban Area (PUA) and is expected to accommodate the majority of the County's growth in the period to 2016 and beyond'.</p>		<p>Support noted.</p>

<p>6.2</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Key Issues for Gloucester – Issue 1</p>	<p>Object</p>		<p>Clarify in Statement 1 that growth includes both housing and employment development.</p>	<p>Agree. Amend text to refer to housing and employment growth.</p>
<p>6.3</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Key Issues for Gloucester – Issue 2</p>	<p>Support</p>	<p>Support Statement 2 'Development of the City is constrained by its tight administrative boundary, areas of landscape conservation importance, and the extent of the River Severn floodplain.</p>		<p>Support noted.</p>
<p>6.4</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Key Issues for Gloucester – Issue 2</p>	<p>Object</p>		<p>Implications of statement 2 could be drawn out. The identified constraints on 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.</p>	<p>Agree in part. Insert reference to the need to ensure sustainable growth.</p>

<p>6.5</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Key Issues for Gloucester</p>	<p>Object</p>	<p>There is a notable lack of reference to housing set out in the key issues for Gloucester.</p>	<p>Adequately address this issue.</p>	<p>Disagree. The issue of affordable housing is referred to in the key issues section, as is the need to accommodate future housing growth and the average rate of household growth in Gloucester.</p>
<p>6.6</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Key Issues for Gloucester – Issue 15</p>	<p>Object</p>	<p>The statement ‘There is a need for more affordable housing’ is too vague. It is not simply a quantitative increase in affordable housing that is required, but a need to look at qualitative issues with respect to general housing development, not just affordable provision. It is important that new housing 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.</p>		<p>Agree in part. Amend text to clarify the need for additional affordable housing in Gloucester (i.e. recent housing needs survey data).</p>

7.1 English Heritage – South West Region	Key Issues for Gloucester	Support	Agree that Gloucester's heritage is one of its key assets.		Support noted.
7.2 English Heritage – South West Region	Key Issues for Gloucester	Support		Whilst the impact of contamination may be a constraint, development proposals should seek to ensure that they have regard to the character in which they are set.	Noted.
7.3 English Heritage – South West Region	Key Issues for Gloucester	Object		Proposals for development should be of the highest standard and aim to create places using the historic environment as a foundation.	Amend text to refer to the importance of preserving and enhancing Gloucester's heritage.

<p>8.1</p> <p>Robert Hitchens Limited</p>	<p>Key Issues for Gloucester</p>	<p>Object</p>		<p>Suggest that paragraph 3.4 (1) be amended as follows:</p> <ul style="list-style-type: none"> • Add ‘...and those parts of Tewkesbury Borough adjoining the built-up area of Gloucester’ between ‘Gloucester’ and ‘...is defined as’. • Add ‘...with Cheltenham’ between ‘...and’ and ‘...is’. 	<p>Agree in part. Reference is already made to the Gloucester Principal Urban Area, which by definition includes land adjoining the built up area of Gloucester.</p> <p>Amend text to include reference to Cheltenham along with Gloucester having to accommodate the majority of the County’s growth.</p>
<p>9.1</p> <p>Highways Agency</p>	<p>Key Issues for Gloucester</p>	<p>Object</p>	<p>Key issue 12 does not take account of the extensive peak period congestion which appears to be prevalent and sufficiently problematic to warrant inclusion.</p>	<p>Expand the key issue as follows:</p> <p>‘Car use and ownership in Gloucester is higher than average, which creates significant peak period congestion. This in turn reduces the quality of life within the City’.</p>	<p>Agree in part. Amend text to refer to the problem of in-commuting and peak-time congestion.</p>

16.1 Mrs Hermione Thornton	Key Issue 13 – Gloucester pupils perform more poorly at all key stages than the national averages except for KS4 (GCSE's)	Object	If Gloucester pupils do achieve reasonably at GCSE, does it matter that they under-perform at other key stages.		It is considered important that pupils perform well at all stages of education. It would also be beneficial if the performance at GCSE level could be further improved.
16.2 Mrs Hermione Thornton	Key Issue 15 – There is a need for more affordable housing	Object		There is an <u>urgent</u> need for more affordable housing.	Agree. Amend text to refer to an 'acute need' for affordable housing.
Spatial Vision					
1.9. Government Office for the South West.	Spatial Vision - Paragraph 4.1	Object	This paragraph has no reference to the environment.	Amend wording to read '...in physical, environmental, economic, and social terms.'	Disagree. The word 'physical' is taken to include environmental and no further clarification is considered necessary.

1.10 Government Office for the South West.	Spatial Vision Option 2	Object	Concern that the Vision for Option 2 suggests that it is deemed acceptable to have some people disadvantaged to some extent'	Possibly amend the wording of this statement.	Agree. Delete the word 'seriously'.
4.1 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Spatial Vision	Support	Options D and E for the Spatial Vision would be most appropriate for development in Gloucester.		Noted.
5.2 Tetlow King Planning representing the South West RSL Planning Consortium.	A Spatial Vision for Gloucester	Support	Support Option 3A as this emphasises the need for affordable housing to be a major objective in the vision for Gloucester.		Noted.

<p>5.3</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>A Spatial Vision for Gloucester</p>	<p>Object</p>	<p>Consider it important for a vision to promote inclusion of hard to reach groups such as the young, elderly, disabled, and ethnic groups within Gloucester's urban fabric.</p>		<p>Noted.</p>
<p>6.7</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>A Spatial Vision for Gloucester.</p>	<p>Object</p>	<p>Concern that, whilst being inspirational, the spatial vision does not make commitments that are beyond the overall scope and remit of the planning system. It should be capable of creating a sound basis for planning policy objectives and planning decisions.</p>		<p>Disagree. The Core Strategy is intended to be a 'spatial' document, which looks beyond the control of land and seeks to tackle wider social, economic and environmental issues.</p>
<p>6.8</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>A Spatial Vision for Gloucester.</p>	<p>Support</p>	<p>Consider Option 3B to be the most realistic and appropriate as it addresses economic, environmental, and social issues, and the principle role of the planning system is to assess the need for development against these. Options 1 and 2 are not sufficiently focussed.</p>		<p>Noted.</p>

6.9 Barton Willmore Planning representing Kayterm PLC.	A Spatial Vision for Gloucester.	Object		The term 'against' is considered inappropriate as it indicated that the objectives of development are necessarily and always contrary to the objectives of conservation. Therefore suggest that 'against' be replaced by 'with'.	Agree. Amend text as per suggested wording.
7.4 English Heritage – South West Region	A Spatial Vision for Gloucester	Support	Support Option 1 and its underlying aim – it will allow for continuity between the old and the new planning systems.		Noted.
9.2 Highways Agency	A Spatial Vision for Gloucester	Support	Support Option 3. This is because it is the most detailed and holistic in nature, and is the only one that could be successfully worked up into a worthwhile 'statement of intent' for the Core Strategy document.		Noted.

<p>11.1 English Nature</p>	<p>Spatial Vision</p>	<p>Object</p>	<p>Option 3B is most preferable.</p>	<p>Reference should be made to both the environment and sustainable development</p>	<p>Noted.</p>
<p>17.1 Lisa Allane – Member of the Community Forum</p>	<p>Spatial Vision</p>	<p>Object</p>	<p>There seems to be an artificial distinctions being made between notions of social justice, economic vibrancy, bricks and mortar planning and transport needs. Why? It cannot be argued effectively that one always negatively affects the other or that they are mutually exclusive.</p>	<p>Suggest an even more radical vision: 'Gloucester. A City that is for everyone. A City where a job, a home, a healthy environment, dynamic planning, commercial opportunities, economic vibrancy, community activity, health, and inclusivity are at the core of development. This would lead to every component being considered when a development is proposed.</p>	<p>Noted.</p>

14.1 Woodland Trust	Spatial Vision	Support	Support Option 3B, particularly the need to balance '...the need for new development against the need to protect the natural and built environment.		Support noted.
Strategic Objectives					
1.11 Government Office for the South West.	Strategic Objectives	Object	Too many Strategic Objectives for the number of Core Policies that are proposed.	Some objectives could serve as overarching objectives with others forming subsidiary objectives e.g. SO2 as overarching, and SO5, SO6, SO13, SO14, SO15 etc as subsidiary objectives.	Agree. Reduce number of strategic objectives to a more manageable number.
1.12 Government Office for the South West.	Strategic Objective SO15 – To steer new development to suitable locations.	Object	Wording seems a little uncertain.	Amend wording.	Agree. Delete wording.

1.13 Government Office for the South West.	Strategic Objective SO20 – To make the most efficient use of land	Object	Wording is not explicit and may be interpreted differently by different people.	Replace the word 'efficient' and make statement more explicit.	Agree. Clarify the wording of this objective.
4.2 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Strategic Objectives	Support	Support Strategic Objectives – particularly SO1 'To Regenerate Central Gloucester' and SO16 'To improve shopping provision in the City Centre and within District and Local Centres'.		Support noted.
4.3 Peacock and Smith representing WM Morrison's Supermarkets PLC.	SO16 – To improve shopping provision in the City Centre and within local and district centres.	Object	This should not prejudice the creation of new Centres where the existing network of Centres is not meeting local needs.		Agree in part. The potential for new local centres to be established in areas that are poorly served, is acknowledged. However, the most important strategic objective is considered to be improving provision in existing centres.

5.4 Tetlow King Planning representing the South West RSL Planning Consortium.	Strategic Objectives	Support	Support the comprehensive list of objectives, particularly objective SO5 'To provide a mix of house types to meet peoples needs at prices which they can afford'		Support noted.
6.10 Barton Willmore Planning representing Kayterm PLC.	Strategic Objectives	Object	Many of the strategic objectives are predominantly aspirational and very broad. They could be interpreted in a variety of different ways in order to justify inappropriate development or refuse appropriate development.	Strategic Objectives should not be given the weight of development plan policies for the determination of planning applications.	Disagree. Strategic objectives provide the context for the Core Policies.
7.5 English Heritage – South West Region	Strategic Objectives	Support	Broadly support the key objectives, particularly SO6, SO7, and SO12.		Support noted.

<p>10.1</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Strategic Objective SO1 – To Regenerate Central Gloucester</p>	<p>Support</p>	<p>Support proposal. Our client's site is within the defined area and so has the opportunity to contribute towards future regeneration.</p>		<p>Support noted.</p>
<p>10.2</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Strategic Objective SO15 – To steer new development to suitable locations</p>	<p>Object</p>		<p>This policy should distinguish between 'new' development and 'necessary' development.</p>	<p>Disagree. This is not considered to be an important issue.</p>

<p>10.3</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Strategic Objective SO20 – To make the most efficient use of land</p>	<p>Support</p>	<p>Support – should be one of the most fundamental aims of the regeneration strategy.</p>		<p>Support noted.</p>
<p>10.4</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Strategic Objective SO21 – To bring back into effective use previously developed land and buildings including those that may have been contaminated by their former use</p>	<p>Support</p>	<p>Support – should be one of the most fundamental aims of the regeneration strategy.</p>		<p>Support noted.</p>

10.5 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Strategic Objective SO23 – To encourage mixed-use development	Object	In some circumstances this may not be the most desirable land-use option – particularly where the introduction of a wider land-use mix could undermine the viability of a scheme on a contaminated site.	Commitment to mixed-use development should only apply in appropriate locations and in relation to appropriate types of use.	Agree. Amend text to refer to the encouragement of mixed-uses in 'appropriate locations'.
11.2 English Nature	Strategic Objectives	Support	Strongly support SO18, 'To maintain a high quality environment in terms of biodiversity, landscape character, air, soil, and water quality'.	The wording could be made a little stronger, 'To protect, conserve and enhance biodiversity, landscape character, air, soil, and water quality'.	Agree. Amend text as per suggested wording.
12.1 RPS representing Commercial Estates Group Limited	Strategic Objectives	Support	Support the inclusion of SO20 – To make the most efficient use of land		Support noted.

<p>12.2</p> <p>RPS representing Commercial Estates Group Limited</p>	<p>Strategic Objectives</p>	<p>Support</p>	<p>Support for the inclusion of SO21 – To bring back into effective use previously developed land and buildings including those that may have been contaminated by their former use.</p>		<p>Support noted.</p>
<p>14.2</p> <p>Woodland Trust</p>	<p>Strategic Objective SO14 – To ensure that everyone has good access to high quality sport, leisure and recreational facilities including publicly accessible open space.</p>	<p>Support</p>	<p>Support this objective. Should also add Woodland Trust Access Standards and figures for Gloucester and Gloucestershire.</p>		<p>Support noted.</p>

<p>14.3</p> <p>Woodland Trust</p>	<p>Strategic Objective SO18 – To maintain a high quality environment in terms of biodiversity, landscape character, air, soil and water quality.</p>	<p>Object</p>		<p>Should be amended so as to read 'To conserve and enhance the natural environment in terms of biodiversity, landscape character, air, soil, and water quality'.</p> <p>It is essential that irreplaceable habitats are protected from development. Gloucester has one recorded piece of ancient woodland still surviving – Matson Wood in the south of the city.</p>	<p>Agree. Amend text as per suggested wording.</p>
<p>16.3</p> <p>Mrs Hermione Thornton</p>	<p>Strategic Objectives</p>	<p>Object</p>	<p>What about the new railway station – if land is available then this would improve services for residents and visitors alike. Land for this should be earmarked now before it goes for another use.</p>		<p>Noted. The strategic objectives already refer to the need to encourage better use of public transport.</p>

Spatial Strategy					
1.14. Government Office for the South West.	Paragraph 6.9	Object	The paragraph and bullet points refer to transport and transport routes but not to walking, cycling, and offering a choice of modes of transport.	Amend paragraph to include sustainable transport choices	Agree that clearer reference could be made to these issues in the spatial strategy.
1.15 Government Office for the South West.	Disadvantages	Object	Title gives a negative feel.	Replace with wording to give a positive note.	This section has been deleted.

1.16 Government Office for the South West	Paragraph 6.16.	Object	Refers to existing occupants being ‘...forced to relocate elsewhere’ – fails to give the document a positive note and does not demonstrate a proactive approach to business engagement in the planning process.		This section has been deleted.
4.4 Peacock and Smith representing WM Morrison’s Supermarkets PLC.	Proposed Spatial Strategy	Support	Support focussing regeneration in the identified Central Area and suggest the boundary is not reduced to provide adequate supply and choice of development sites so that sufficient growth and development may take place without undue pressure on existing traffic flows.		Support noted.
4.5 Peacock and Smith representing WM Morrison’s Supermarkets PLC.	Proposed Spatial Strategy	Object		A more detailed Strategy may be needed to define what would constitute appropriate locations for any new District or Local Centres within the Central Area including size, scale, and level of provision.	Disagree. The document clearly refers to appropriate locations as being those that are not currently well-served by an existing centre.

<p>6.11</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Spatial Strategy</p>	<p>Support</p>	<p>The underlying principles of the Spatial Strategy are supported.</p>		<p>Support noted.</p>
<p>6.12</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Spatial Strategy</p>	<p>Object</p>	<p>Spatial Strategy does not adequately address the needs of the whole administrative area. The identification of physical constraints in the north, east, and south-east does not mean that there are no opportunities for development in these areas.</p>	<p>The spatial Strategy should promote creative developments in other areas where is accordance with national and strategic planning policies.</p>	<p>Disagree. The proposed spatial strategy acknowledges that modest development will be needed in locations outside the 'central area' of Gloucester.</p> <p>The most sustainable opportunities for development are however located generally within the Central Area.</p>
<p>6.13</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Spatial Strategy</p>	<p>Object</p>	<p>Sustainable development is not synonymous with the City Centre or even brownfield locations.</p>	<p>Whilst the Spatial Strategy should rightly prioritise City Centre and brownfield development, it should not be at the exclusion of other locations.</p>	<p>Comment noted. It is acknowledged that there may be sustainable development opportunities located outside the Central Area. The proposed strategy acknowledges the potential for modest growth across the wider city area.</p>

6.14 Barton Willmore Planning representing Kayterm PLC.	Spatial Strategy	Object	The proposed Spatial Strategy means that the needs of existing communities, businesses and other interests outside the Central area will be neglected.		Disagree. Whilst the spatial strategy focuses on the regeneration of the Central Area, this is not at the exclusion of the wider city area.
6.15 Barton Willmore Planning representing Kayterm PLC.	Spatial Strategy	Object	High-density residential schemes are not always appropriate, even though it would be an efficient use of land.		Comment noted. The proposed spatial strategy states that high-density development will be encouraged in <u>appropriate locations</u> such as those found along major transport routes. No further changes are considered necessary.
7.6 English Heritage – South West Region	Spatial Strategy	Support	Broadly support the aim of focussing the majority of growth in the Central Area.	Work must be carried out with the aim of integrating any new development with the historic environment. Quality of design must also be high.	Support noted. The strategy refers to the need to safeguard the historic environment of Gloucester.

<p>7.7</p> <p>English Heritage – South West Region</p>	<p>Spatial Strategy</p>	<p>Object</p>		<p>Whilst there is recognition that the historic environment should be protected in the proposed spatial strategy, this should be extended to recognise the role and contribution these assets can play in creating a sense of place and regeneration of the central area.</p>	<p>Agree that further reference should be made to the potential role of the historic environment. Amend text accordingly.</p>
<p>8.2</p> <p>Robert Hitchins Limited</p>	<p>Spatial Strategy</p>	<p>Object</p>		<p>The Spatial Strategy should acknowledge the contribution that land in adjacent districts, notably in Tewkesbury, will make towards meeting the development requirements of the PUA</p>	<p>Agree, Insert reference to the wider Gloucester Principal Urban Area.</p>

<p>9.3</p> <p>Highways Agency</p>	<p>Spatial Strategy</p>	<p>Support</p>	<p>Support the strategy of concentrating development in the centre of the City. This is because it concentrates development in the City's existing urban area, away from the trunk road network, and maximises the prospects for encouraging travel by alternative modes within the urban area.</p>		<p>Support noted.</p>
<p>10.6</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Proposed Spatial Strategy</p>	<p>Support</p>	<p>Support the proposed Strategy – there are many brownfield redevelopment opportunities. Identified residential area should coincide with the boundary of the GHURC.</p>		<p>Support noted.</p>
<p>12.3</p> <p>RPS representing Commercial Estates Group Limited</p>	<p>Spatial Strategy, Paragraph 6.6</p>	<p>Support</p>	<p>Paragraph states that the only feasible option for future growth is to focus predominantly on the central area of the City – this view is supported.</p>		<p>Support noted.</p>

12.4 RPS representing Commercial Estates Group Limited	Spatial Strategy, Paragraph 6.9	Support	Support expressed for points 1, 3, and 4 of this paragraph.		Support noted.
12.5 RPS representing Commercial Estates Group Limited	Spatial Strategy, Paragraph 6.12	Support	Boundary of Central Area as shown at Appendix 1 should be retained.		Support noted.
12.6 RPS representing Commercial Estates Group Limited	Spatial Strategy, Paragraph 6.16	Object	Some occupiers may be displaced by the centralised spatial strategy. However this assumes that no level of control is afforded by either employment protection policy or by criteria based policy concerning potential redevelopment within the central area.		It is acknowledged that other policies will safeguard existing employment land where it is needed. The displacement of any existing occupants would need to be carefully managed through a programme of re-location.

12.7 RPS representing Commercial Estates Group Limited	Spatial Strategy, Paragraph 6.17	Object	<p>Increased traffic congestion will be a question of transport management. It is not a reason to object to the proposed strategy and increased traffic congestion is just as likely to occur from peripheral development e.g. by increasing reliance on the private car.</p> <p>It is also in line with PPG 13 – Transport.</p>		Noted.
16.4 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.6	Support	Focussing development in the centre is the right strategy in Gloucester although not all housing should be intensive.		Support noted. The strategy recognises that high-density development will be encouraged in <u>appropriate</u> locations.
16.5 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.9	Support	Enormously important to safeguard Greenfield land – all developments will need open space and access to shops.		Support noted.

16.6 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.12	Object	Should not adopt a narrower definition of the Central Area.		Noted.
16.7 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.13	Support	Encourage residential use over shops and offices in existing buildings in the City Centre.		Support noted.
16.8 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.13, Point 4.	Support	Resisting out of centre leisure and retail proposals.		Support noted.
16.9 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.13, Point 5.	Object	Not viable to create new district and local centres if it will mean demolishing housing.		Disagree. It may be possible to provide new local or district centres in appropriate locations without the demolition of existing premises.

16.10 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.13, Point 10.	Support	Important and sensible to protect environmentally sensible parts of the City from inappropriate development.		Support noted.
16.11 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.13, Point 12.	Support	Very important to protect existing areas of publicly accessible open space.		Support noted.
16.12 Mrs Hermione Thornton	Spatial Strategy, Paragraph 6.13, Point 13	Support	Very important to resist the loss of and providing for new community facilities where they are needed.		Support noted.
13.1 White Young Green representing Peel Developments (UK) Limited	Underlying Aims and Strategic Objectives	Support	Support the focus on Central Area regeneration.		Support noted.

Core Policies					
4.6 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Core Policy 1 – Key Development Principles	Object	Support in principle the inclusion of a single overarching policy as long as it can be demonstrated that this is necessary to enhance rather than to simply duplicate the Spatial Strategy, and is well related to other Core Policies.		This policy has been deleted.
6.16 Barton Willmore Planning representing Kayterm PLC.	Core Policy 1 – Key Development Principles.	Object	Do not think that this type of overarching policy is required.	Prefer alternative approach of relying upon a combination of other policies.	Agree. This policy has been deleted.
7.8 English Heritage – South West Region	Core Policy 1 – Key Development Principles	Object		Bearing in mind the nature of the GHURC and the importance attached to the historic environment, the Core Policy should be explicit in its content to protect and enhance the historic environment. This could supplement Core Policy 10.	This policy has been deleted.

9.4 Highways Agency	Core Policy 1 – Key Development Principles	Support	Support inclusion as a Core Policy – will give the guiding principle more statutory weight.		This policy has been deleted.
10.7 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Core Policy 1 – Key Development Principles	Support	Broadly support this overarching policy.		This policy has been deleted.
10.8 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Core Policy 1 – Key Development Principles	Object	To expect proposals to ‘...contribute to a reduction in car use’ is too prescriptive.	More appropriate to expect proposals to reduce the need to travel, especially by the private car.	This policy has been deleted.

16.13 Mrs Hermione Thornton	Core Policy 1 – Key Development Principles.	Support	Support as it will apply to all development.		This policy has been deleted.
1.17 Government Office for the South West	Core Policy 2 – Housing	Object.	Housing Provision Policy should be informed by the housing trajectory and the RSS housing figures.		Agree. The housing core policy is now informed by the draft RSS housing figures. No change.
1.18 Government Office for the South West	Core Policy 2 – Housing	Object	Affordable Housing matters should be guided by an evidence base and PPG 3 – the thresholds should not be a matter for consultees to comment on a level that suits them.		Agree. The threshold for affordable housing provision and level of provision should be informed by local housing needs data. This is clearly set out in the document.

<p>2.1</p> <p>City Centre Community Partnership</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object</p>	<p>Concern raised about affordable housing quotas and the possibility that the focus for affordable housing will be the City Centre (or Central Area)</p>		<p>Noted. Affordable housing provision is based on evidence of local housing need. In focusing the majority of growth into the Central Area, the majority of new affordable housing is likely to be created here although the strategy does allow for modest housing development in other locations. It is also possible to accept financial contributions from developments within the Central Area towards the provision of affordable housing elsewhere although it should be reasonably related.</p>
<p>2.2</p> <p>City Centre Community Partnership</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object</p>	<p>Concern that affordable low-cost housing would mean low-cost for the builder i.e. high density, cheap materials etc. How will it be possible for builders to adhere to SO6 and SO12 if this is the case?</p>		<p>The type of affordable housing provision will be a matter for negotiation based on local housing need at the time of any planning application. The greatest need in Gloucester is for social-rented forms of accommodation.</p>

2.3 City Centre Community Partnership	Core Policy 2 – Housing Provision	Object	No mention of family sized affordable housing units in the City Centre therefore concern over an 'unbalanced community' in the City Centre.		Noted. The type of affordable housing provision will be a matter for negotiation based on local housing need at the time of any planning application.
2.4 City Centre Community Partnership	Core Policy 2 – Housing Provision	Object	The reason for putting most of the affordable housing in the Centre is that it puts people on low incomes near facilities and reduce the need to travel – however would suggest that the City Centre is no better than any other part of the City for supplying basic needs, and that transport will still be needed.		Disagree. The Central Area provides much greater opportunity to use alternative modes of transport such as walking, cycling and public transport.
2.5 City Centre Community Partnership	Core Policy 2 – Housing Provision	Object	Concern over mixed-use developments constituting flats above offices rather than a terrace with a shop on the corner. Residents will feel trapped as they have to negotiate youths, and dead space to access their properties out of office/trading hours.		Disagree. Mixed-use development is an accepted part of national planning policy as a way of ensuring the most efficient use is made of land. Any amenity issues such as safety and noise would be addressed through the development control process.

2.6 City Centre Community Partnership	Core Policy 2 – Housing Provision	Object	How can we ensure that affordable housing is bought by owner-occupiers and not unscrupulous landlords?		The greatest need for affordable housing in Gloucester is for social-rented accommodation. The City Council works in close partnership with a number of preferred registered social landlords.
5.5 Tetlow King Planning representing the South West RSL Planning Consortium.	Core Policy 2 – Housing Provision	Support	Support Option 2 - an increased housing target to that set by the Structure Plan should be sought. It is important that a substantial proportion is targeted for affordable housing and that the phasing of new development properly reflects demonstrated local need.		Support noted.
5.6 Tetlow King Planning representing the South West RSL Planning Consortium.	Core Policy 2 – Housing Provision	Support	Support more flexible Greenfield policy allowing for schemes on the edge of urban settlements and windfall sites to come forward during the future.		Support noted.

<p>5.7</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support</p>	<p>Support housing figure to reflect the 15-year target but also welcome an annual figure to reflect the 'plan, monitor, and manage approach.</p>		<p>Support noted.</p>
<p>5.8</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support</p>	<p>Support the Council's recognition of the affordable housing shortfall and its 'acute need' within the district'</p>		<p>Support noted.</p>
<p>5.9</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support</p>	<p>Support the 15 dwelling affordable housing threshold for sites of 0.5 hectares.</p>		<p>Support noted.</p>

<p>5.10</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object</p>	<p>The proposed reduction in the affordable housing threshold to 5 dwellings is too ambitious. This would address acute affordable housing need however a more flexible policy would encourage development sites that would otherwise not come forward.</p>		<p>Agree that 5 dwelling threshold is too low. Amend text to refer to 15 dwellings.</p>
<p>5.11</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support</p>	<p>Support affordable housing target of 40%.</p>		<p>Support noted.</p>
<p>5.12</p> <p>Tetlow King Planning representing the South West RSL Planning Consortium.</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object</p>	<p>Object to affordable housing target of 50% - this would be onerous and might not achieve a good balance in house sizes or contribute to the creation of mixed communities.</p>		<p>Objection noted.</p>

6.17 Barton Willmore Planning representing Kayterm PLC.	Core Policy 2 – Housing Provision	Support	Support Option 2 whereby the Structure Plan figure is adopted as a minimum requirement for new housing in Gloucester.		Support noted.
6.18 Barton Willmore Planning representing Kayterm PLC.	Core Policy 2 – Housing Provision	Object	A flexible approach should be adopted. The sequential test required by national and strategic policies means that Greenfield sites are protected and their release carefully managed.	No blanket policy should apply with Greenfield development.	Agree. Amend Core Policy to give priority to the re-use of previously developed land whilst allowing for greenfield development in exceptional circumstances where the Council's housing requirement cannot be met using previously developed land alone.
6.19 Barton Willmore Planning representing Kayterm PLC.	Core Policy 2 – Housing Provision	Support	A separate Core Policy for Affordable Housing may be appropriate.		Agree. Insert separate Core Policy relating to affordable housing provision.

6.19 Barton Willmore Planning representing Kayterm PLC.	Core Policy 2 – Housing Provision	Support	The current threshold for affordable housing should not be increased or decreased.		Amend text to refer to 15 dwellings.
8.3 Robert Hitchins Limited	Core Policy 2 – Housing Provision	Support	The LDF should be prepared on the basis of treating the 10,200 dwellings as a minimum requirement for new housing in Gloucester.		Agree. The housing core policy is now informed by the draft RSS housing figures.
8.4 Robert Hitchins Limited	Core Policy 2 – Housing Provision	Object	The Core Strategy should not be too prescriptive over the amount of affordable housing sought.	The Core Strategy should refer to affordable housing being sought in light of the most recent data on affordable housing needs at the time the planning application is made.	Agree in part. Whilst affordable housing provision should be based on evidence of need, it is considered appropriate for the Core Strategy to specify the threshold at which affordable housing will be sought as well as the level of provision that will be sought. This will be set out in a separate Core Policy.

<p>9.5</p> <p>Highways Agency</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support</p>	<p>Support Option 1. This will deliver the greatest certainty over the number of houses to be built in the City over the next 15 years. Therefore would allow the impact of such developments on the transport system to be forecast with some degree of accuracy – therefore advance mitigation of these impacts can be planned and implemented with equal certainty.</p> <p>Object to Options 2 and 3. These would lead to difficulties in forecasting and mitigating the impact of residential developments on the transport systems. Also that they could lead to a significant escalation of such development, thus impacting on the Trunk Road Network.</p>		<p>Support noted.</p>
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9.6 Highways Agency	Core Policy 2 – Housing Provision	Support	As much development as possible should take place on brownfield land – in line with current Government Policy.		Support noted.
9.7 Highways Agency	Core Policy 2 – Housing Provision	Support	Support development on Greenfield land where a sequential test indicates that this is the only suitable location.		Support noted.
10.9 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Core Policy 2 – Housing Provision	Support	Level of housing provision between 2001 and 2016 should use the figure adopted under the Structure Plan Third Alteration as a guide.	It should not exclude unallocated windfall sites from coming forward where appropriate.	Support noted although the Third Alteration Structure Plan has not been adopted. It is considered more appropriate to base the housing requirement on the figures contained in the Regional Spatial Strategy.

<p>10.10</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support.</p>	<p>Development of Greenfield land should be seen as a last resort and only considered in the absence of sequentially preferable brownfield opportunities elsewhere.</p>		<p>Support noted.</p>
<p>10.11</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object</p>	<p>Affordable housing does not warrant inclusion as a separate Core Policy.</p>		<p>Disagree. Affordable housing provision is an important issue for Gloucester and should be dealt with through a separate Core Policy.</p>

<p>10.12</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Object.</p>	<p>Threshold for affordable housing should remain unchanged.</p>		<p>Amend text to refer to 15 dwellings.</p>
<p>10.13</p> <p>Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support</p>	<p>Affordable housing provision should be determined by negotiation on a case-by-case basis.</p>		<p>Agree that affordable housing provision should be determined by negotiation on a case-by-case basis. However it is considered appropriate to specify an overall target level of provision as well as the thresholds at which an affordable housing requirement will be triggered.</p>
<p>12.8</p> <p>RPS representing Commercial Estates Group Limited</p>	<p>Core Policy 2 – Housing Provision</p>	<p>Support</p>	<p>Support for option 2 whereby the 10,200 dwellings emerging from the Structure Plan would be treated as a minimum.</p>		<p>Support noted.</p>

16.14 Mrs Hermione Thornton	Core Policy 2 – Housing Provision	Support	Support Option 2 – seems sensible to think further ahead but Greenfield sites should be kept and enhanced, as they are so important.		Support noted.
16.15 Mrs Hermione Thornton	Core Policy 2 – Housing Provision	Support	Strongly support inclusion of affordable housing in the Core Policy.		Support noted.
16.16 Mrs Hermione Thornton	Core Policy 2 – Housing Provision	Support	Support dropping threshold for affordable housing to 5 – but this may spoil very small developments in the potential buyers mind.		Amend text to refer to 15 dwellings.
1.19 Government Office for the South West	Core Policy 3 – Employment Land	Object	Inaccurately refers to the LDF covering the period up to 2016.		Agree. The LDF is a rolling document that will be continually updated. It has no end-date other than in relation to land supply. Amend text accordingly.

<p>6.20</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Core Policy 3 – Employment Land</p>	<p>Object.</p>	<p>A similar approach should be adopted as in the most recent version of the Structure Plan – emphasising the need for a range and choice of employment sites but not necessary setting a target based on either land or jobs.</p>		<p>Comment noted.</p>
<p>6.21</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Core Policy 3 – Employment Land</p>	<p>Object</p>	<p>Object to the inclusion of a Core Policy protecting employment land.</p>	<p>Any reference should be made in the context of the recent Government guidance contained in the update to PPG 3 (Housing), 'Supporting the delivery of new housing', Para 42(a).</p>	<p>Disagree. Whilst the update to PPG 3 (Housing), 'Supporting the delivery of new housing', Para 42(a) is fully recognised, this does not mean that employment land should not be protected from other forms of development. This is considered to be an important issue. Amend wording of Core Policy to introduce a suitable degree of flexibility in line with paragraph 42(a) referred to above.</p>

8.5 Robert Hitchins Limited	Core Policy 3 – Employment Land	Support	The Council should set its own numerical target for employment land based on achieving a balance between residential and employment uses.		Comment noted.
9.8 Highways Agency	Core Policy 3 – Employment Land	Support	Support Option 1 – this will offer the greatest predictability as to the level of future employment land development.		Support noted.
10.14 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Core Policy 3 – Employment Land	Support	Introduction of an employment target based on the net number of jobs rather than the amount of floorspace – would be a much more realistic indicator of future needs.		Support noted although the use of a job-based target is likely to prove much more difficult to monitor than a target based on floorspace. Furthermore, some forms of employment are more labour-intensive than others.

4.7 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Core Policy 4 – Transport and Accessibility	Object	Support in principle issues of transport and accessibility being dealt with as a single policy, but it must be demonstrated that this is necessary to enhance rather than to simply duplicate the Spatial Strategy, and is well related to other Core Policies.		Agree with the need to avoid duplication although it is considered appropriate to interpret the spatial strategy through relevant core policies.
6.22 Barton Willmore Planning representing Kayterm PLC.	Core Policy 4 – Transport and Accessibility	Object	Do not think that this type of overarching policy should be applied to development proposals. Any such policy should be in accordance with PPG 13.		Disagree. It is considered appropriate to interpret the spatial strategy through relevant core policies such as this. Agree with the need to reflect guidance set out in PPG13 – Transport.
9.9 Highways Agency	Core Policy 4 – Transport and Accessibility	Support	Support inclusion of this as a Core Policy – this will give the objectives more statutory weight.		Support noted.

9.10 Highways Agency	Core Policy 4 – Transport and Accessibility	Object		Core Strategy could usefully include explicit statements requiring promoters to produce Transport Assessments and Travel Plans for any substantial development.	Disagree. This issue will be dealt with through the Development Control Policy document.
12.9 RPS representing Commercial Estates Group Limited	Core Policy 4 – Transport and Accessibility	Support	Support an overarching policy. Must reflect the objectives set out in Paragraph 6 of PPG 13, but with emphasis on those that are most relevant to Gloucester.		Support noted. Agree that the policy should reflect guidance set out in PPG13 – Transport, particularly where relevant to Gloucester.
16.17 Mrs Hermione Thornton	Core Policy 4 – Transport and Accessibility	Object	Doubt whether any policy will make any difference to people using private cars.		Comment noted.

4.8 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Core Policy 5 – Regeneration of the Central Area	Support	Support the inclusion of this as a Core Policy as it focuses on what is a complex and important issue for the City.		This policy has been deleted.
6.23 Barton Willmore Planning representing Kayterm PLC.	Core Policy 5 - Regeneration of the Central Area	Object	This policy should make clear that it only refers to new development in the Central Area.		This policy has been deleted.
10.15 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Core Policy 5 – Regeneration of the Central Area	Support	Given the importance being attached to the regeneration of the central area this must be given Core Policy recognition.		This policy has been deleted.

<p>12.10</p> <p>RPS representing Commercial Estates Group Limited</p>	<p>Core Policy 5 – Regeneration of the Central Area</p>	<p>Support</p>	<p>Approach supported.</p>	<p>Where considering sites beyond the Central Area it must be a requirement of the LPA to demonstrate that all possible effort has been made to enable development of those sites within it.</p>	<p>This policy has been deleted.</p>
<p>4.9</p> <p>Peacock and Smith representing WM Morrison's Supermarkets PLC.</p>	<p>Core Policy 6 – City and Centre and Retail Development</p>	<p>Support</p>	<p>Support the inclusion of this as a Core Policy, as it is vital that the aims and objectives for the City Centre and other existing /future District and Local Centres (as well as policies for retail development as a whole) are set out clearly to ensure that there is no conflict with the aims and objectives for the regeneration of the Central Area (Core Policy 5)</p>		<p>Support noted.</p>

4.10 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Core Policy 6 – City and Centre and Retail Development	Object		Whilst reference to the retail study is helpful, it should not form part of the policy itself.	Agree.
6.24 Barton Willmore Planning representing Kayterm PLC.	Core Policy 6 – City Centre and Retail Development	Object	Do not consider that a target for retail floorspace is required. Any such policy should be in accordance with PPS 6 – Planning for Town Centres.		Comment noted.
9.11 Highways Agency	Core Policy 6 – City Centre and Retail Development	Support	Support inclusion as a Core Policy – will give the objectives more statutory weight.		Support noted.

6.25 Barton Willmore Planning representing Kayterm PLC.	Core Policy 7 – Mixed-use Developments	Support	Support for Council's commitment to mixed-use developments in appropriate locations.		Support noted.
9.12 Highways Agency	Core Policy 7 – Mixed-use Development	Support	Support inclusion as a Core Policy – will give the objectives more statutory weight.		Support noted.
10.16 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Core Policy 7 – Mixed-use Development	Objection		If this were to be made a Core Policy it must recognise that mixed-use development may not always be appropriate in certain locations and that each case should be considered on its individual merits.	Agree. Insert reference to mixed-use development being encouraged in appropriate locations.
16.18 Mrs Hermione Thornton	Core Policy 7 – Mixed-use Development	Support	Support mixed-use development.		Support noted.

1.20 Government Office for the South West	Core Policy 8 – Design and Density	Object	No mention is made reference to sustainable forms of transport	Include ‘...close to good transport routes’ and reference to ‘...a choice of means of transport’.	Agree. Insert reference to accessibility.
4.11 Peacock and Smith representing WM Morrison’s Supermarkets PLC.	Core Policy 8 – Design and Density	Object	Whilst high quality design and architecture is important they must be consistent with location and commercial considerations, especially in areas of low investment yield. Therefore do not feel that this issue carries sufficient weight to constitute a Core Policy – maybe consider within other Core Policies.		Disagree. Design is a key part of the Government’s Planning Policy Statement 1 – Delivering Sustainable Development. It is therefore considered sufficiently important to warrant inclusion as a Core Policy.
6.26 Barton Willmore Planning representing Kayterm PLC.	Core Policy 8 – Design and Density	Object	Whilst supporting the promotion of high quality design and efficient use of land, it is beyond the remit of reasonable planning policy to require all new development to be ‘of the highest possible quality’.		Agree. Amend text accordingly.

7.9 English Heritage – South West Region	Core Policy 8 – Design and Density	Object		Core Policy 8 should make reference to the Gloucester Characterisation Study and Development Framework carried out by Alan Baxter Associates as this informs the process and impacts of development proposals, ensuring the character of Gloucester Centre is reflected.	Disagree. This document is most appropriately referred to in the Development Control Policy document design section.
12.11 RPS representing Commercial Estates Group Limited	Core Policy 8 – Design and Density	Support	Support policy encouraging higher densities. Will enhance the potential for new and improved public transport services from increased patronage and public transport contributions.		Support noted.
16.19 Mrs Hermione Thornton	Core Policy 8 – Design and Density	Support	Support inclusion as a Core Policy.		Support noted.

6.28 Barton Willmore Planning representing Kayterm PLC.	Core Policy 9 – Community Safety	Object	Whilst supporting the aims of this policy, it could instead be included in the Development Control Policies document.		Comment noted however given the fact that the crime rate in Gloucester is much higher than average it is considered appropriate to address the issue of community safety through a Core Policy.
16.20 Mrs Hermione Thornton	Core Policy 9 – Community Safety	Support	Support inclusion as a Core Policy.		Support noted.
6.29 Barton Willmore Planning representing Kayterm PLC.	Core Policy 10 – Protection of the Natural and Built Environment.	Object		Policy should be reworded so as to positively seek the 'protection' of the natural and built environment rather than being negatively worded (...resisting development that would cause harm...'. This would then allow a balanced approach to be taken when weighing up the benefits and costs of individual proposals.	Agree. Amend text as per suggested wording.

11.3 English Nature	Core Policy 10 – Protection of the Natural and Built Environment	Support	Support the inclusion of Core Policy 10. This is a key issue for Gloucester.		Support noted.
14.4 Woodland Trust	Core Policy 10 – Protection of the Natural and Built Environment.	Object		Would like to see a specific reference to including important semi-natural habitats such as ancient woodland, which are not necessarily covered by habitat designations.	Agree. Amend text accordingly.
16.21 Mrs Hermione Thornton	Core Policy 10 – Protection of the Natural and Built Environment	Support	Support inclusion as a Core Policy.		Support noted.
1.21 Government Office for the South West	Core Policy 11 – Community Provision (page 22)	Object	There is no mention of including provision for collective worship in Community Provision.	Consider including provision for collective worship as Community Provision.	Comment noted.

6.30 Barton Willmore Planning representing Kayterm PLC.	Core Policy 11 – Community Provision	Object	Whilst supporting the provision of new community facilities, this does not need to be a Core Policy.		Comment noted.
16.22 Mrs Hermione Thornton	Core Policy 11 – Community Provision	Support	Support inclusion as a Core Policy.		Support noted.
17.2 Lisa Allane – Member of the Community Forum	Core Policies	Object	No suggestion that investment and inward investment will be sought for some of the community activities that will be needed.	Include recognition.	Insert reference to investment in community activities in the supporting text to Core Policy 12 – Community Provision.
4.12 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Core Policy 12 – Access to Shops and Services	Object	Do not feel that this issue should be dealt with as a separate Core Policy but included under respective policies for transport, retail and community services provision.		This policy has been deleted.

6.31 Barton Willmore Planning representing Kayterm PLC.	Core Policy 12 – Access to Shops and Services	Object	Whilst supporting the aims of the policy, this does not need to be a Core Policy.		This policy has been deleted.
16.23 Mrs Hermione Thornton	Core Policy 12 – Access to Shops and Services	Support	Partially important.		This policy has been deleted.
4.13 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Core Policy 13 – Sport and Recreation	Object	Issues of sport and recreational open space should be set against national standards and any other criteria would require detailed justification. Suggest that changes in current policy e.g. doubling open space requirements from new employment land would render many schemes unviable.		There are no national standards of open space provision per se. The NPFA have recommended standards but a number of local authorities choose to exceed these where this is demonstrable need. Gloucester has an overall shortage of public open space and it is considered appropriate to use a higher standard of provision than that advocated by the NPFA.

					Agree that the doubling of open space requirements relating to employment land is potentially unrealistic.
4.14 Peacock and Smith representing WM Morrison's Supermarkets PLC.	Core Policies 13 and 14 - Sport and Recreation and Developer Contributions respectively	Object	Repetition between the two Core Policies.	Developer Contributions may be better handled as a Supplementary Planning Document (SPD) rather than a Core Policy.	Agree in part. Developer contributions does lend itself to a Supplementary Planning Document and this may be considered in the future. It is not however considered that there is excessive repetition between Core Policies 13 and 14 although it is acknowledged that there is some overlap.
6.32 Barton Willmore Planning representing Kayterm PLC.	Core Policy 13 – Sport and Recreation	Object		This policy should be reworded so as to be positive rather than negative – it should seek to protect existing sports and recreational facilities and encourage the provision of new sport and recreational facilities.	Agree. Draft policy options to address the protection of existing facilities and the provision of new facilities.

<p>6.33</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Core Policy 13 – Sport and Recreation</p>	<p>Object</p>	<p>This policy should apply to public open space and playing pitches/fields. It should not apply to private sports facilities.</p>		<p>Disagree. It may be the case that private facilities are made available or are capable of being made available for the benefit of the public. As such it is appropriate to seek to protect such facilities from other forms of development.</p>
<p>6.34</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Core Policy 13 – Sport and Recreation</p>	<p>Object</p>	<p>Do not consider that a pro-rata approach should be applied to open space provision in new residential developments. The current policy requirements are adequate and should not be increased.</p>		<p>Comment noted.</p>
<p>6.35</p> <p>Barton Willmore Planning representing Kayterm PLC.</p>	<p>Core Policy 13 – Sport and Recreation</p>	<p>Object</p>	<p>Policy should include flexibility so that account can be taken of existing open space provision – in areas where there is a large existing supply of open space, it may be inappropriate to seek the full level of provision.</p>		<p>The need to take into account existing open space provision is acknowledged. Add criteria relating to existing provision.</p>

6.36 Barton Willmore Planning representing Kayterm PLC.	Core Policy 13 – Sport and Recreation	Object	Do not think that the requirement for open space provision in employment developments should be increased to 10%.		Agree that 5% provision of open space in employment development is more appropriate.
6.37 Barton Willmore Planning representing Kayterm PLC.	Core Policy 13 – Sport and Recreation	Object	Do not think its fair to require open space provision of 5% or 0.2 hectares – whichever is greater. This would mean that small sites would have to provide 0.2 hectares (potentially much more than 5%).		Disagree. The policy is intended to apply to major employment developments only in which case there is unlikely to be significant difference between the provision of 5% or 0.2ha
16.24 Mrs Hermione Thornton	Core Policy 13 – Sport and Recreation.	Support	Support resisting the loss of existing sports and recreational facilities. But what constitutes exceptional circumstances? This seems like a loophole.		Comment noted. Agree that further detail should be added to provide greater clarity.
16.24 Mrs Hermione Thornton	Core Policy 13 – Sport and Recreation	Support	Support provision of open space within housing and employment uses.		Support noted.

16.25 Mrs Hermione Thornton	Core Policy 13 – Sport and Recreation	Support	Support seeking open space provision from all developments.		Support noted.
16.26 Mrs Hermione Thornton	Core Policy 13 – Sport and Recreation	Support	Support seeking open space provision of 2.8 hectares per 1,000 population.		Support noted.
16.27 Mrs Hermione Thornton	Core Policy 13 – Sport and Recreation	Support	Support seeking open space from employment development – but this space wouldn't necessarily need to be public.		Support noted.
6.38 Barton Willmore Planning representing Kayterm PLC.	Core Policy 14 – Developer Contributions.	Object	This does not need to be included as a Core Policy.		Disagree. Ensuring that new development does not place an unreasonable burden on existing infrastructure is considered to be a key issue that warrants inclusion as a Core Policy.

6.39 Barton Willmore Planning representing Kayterm PLC.	Core Policy 14 – Developer Contributions	Support	Agree that the issue is a matter for negotiation on a site-by-site basis. There must be room for flexibility.		Support noted.
8.6 Robert Hitchins Limited	Core Policy 14 – Developer Contributions	Support	The Council’s approach in Core Policy 14 – Developer Contributions is supported.		Support noted.
9.13 Highways Agency	Core Policy 14 – Developer Contributions	Support	Favour provision of such advice to developers – must state that it is only guidance and negotiation will determine requirements on a site-by-site basis.		Support noted.

9.14 Highways Agency	Core Policy 14 – Developer Contributions	Support		Include statement requiring developers to contribute to suitable mitigation measures for any adverse impact created on the highway network as a result of their proposals. This should include any effect on the trunk road network.	Comment noted. The policy is intended to apply to all forms of developer contributions not just highway improvements where these are needed. No change.
10.17 Planning Perspectives representing SecondSite Property Holdings Limited (SSPH)	Core Policy 14 – Developer Contributions	Object		The policy should not be unduly prescriptive – but should explain that the level of developer contributions sought will be a matter for negotiation.	Agree. The level of developer contribution should be a matter for negotiation based on relevant issues.
16.28 Mrs Hermione Thornton	Core Policy 14 – Developer Contributions	Support	Support developer contributions being a matter for assessment and negotiation on a site-by-site basis.		Support noted.

Monitoring and Implementation					
6.40 Barton Willmore Planning representing Kayterm PLC.	Monitoring and Implementation	Support	Support ongoing monitoring of the LDF, including assessing that the policies are delivering the anticipated outcomes.		Support noted.
6.41 Barton Willmore Planning representing Kayterm PLC.	Monitoring and Implementation	Support	Council must adopt monitoring criteria that are specific and measurable so that all monitoring is effective in terms of accountability. Support proposed 'objectives – policies – targets – indicators' approach for monitoring.		Support noted.
8.7 Robert Hitchins Limited	Monitoring and Implementation Framework	Support	The Council should ensure that there will be well defined objectives against which LDF documents can be monitored.		Support noted.

Key Diagram					
3.1 Miss A C Balchin	Key Diagram 1	Object	There are no 'green areas' adjoining the A38 in Quedgeley and very little adjoining the A417 in Barnwood.	Amend diagram	Agree. Amend key diagram accordingly.
3.2 Miss A C Balchin	Key Diagram 1	Object		To differentiate between 'green areas' which are potentially developable and those which carry some designation which precludes development e.g. flood plain, special landscape areas.	The key diagram is intended to be a schematic representation only. Detailed boundaries of specific designations will be set out on the LDF proposals map/s. No change.
3.3 Miss A C Balchin	Key Diagram 1	Object		To show the administrative boundary of Gloucester – shaded area currently included part of Hardwicke and so would avoid confusion.	Agree. Amend key diagram accordingly.