

CENTRAL AREA ACTION PLAN
PREFERRED OPTIONS CONSULTATION
AUGUST – SEPTEMBER 2006
SCHEDULE OF COMMENTS

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Explanatory Note

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

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

This schedule does not detail officer comments to these representations. Officers will consider representations in producing the submission version of the Central Area Action Plan. This is scheduled for June 2008.

A number of other documents were consulted on alongside the Central Area Action Plan (Preferred Options), and separate schedules have been drawn up for these. These are as follows:

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

Name/ Reference Number	Support/ Object/ Comment	Policy/ Section	Comment/Representation/Request Amendment
<u>General Comments – Central Area Action Plan</u>			
0181 South West Regional Assembly	Comment	Local Development Documents	<p>The RPB assesses consultations on Local Development Documents (LDDs) on whether the proposal is in 'general conformity' with the Regional Spatial Strategy (RSS). Until the Draft RSS is published, RPG10 is technically the South West RSS. You should be mindful during the development of the LDF that the Draft RSS and its evidence base will carry greater weight the further it goes through the process to publication. As you know the formal public consultation has recently drawn to a close and the EiP is scheduled for April 2007.</p> <p>On the whole I consider that the above documents are well presented and read well. In regard to the Central Area Action Plan I would just like to emphasise a number of key policies in the Draft RSS. Firstly I would like to draw you attention to policy H1: Affordable Housing, which requires at least 30% of all housing development annually across each local authority area and Housing Market Area to be affordable with rates of up to 60% or higher in areas of greatest need. It is important that the needs of the central area are properly reflected in the affordable housing target set.</p> <p>Secondly I would like to refer you to policy H2: Housing Densities of the Draft RSS, which requires "Density of development of housing at the SSCTs should be at least 50 dph and considerably higher in well planned mixed use developments within the existing urban area" (p132).</p> <p>Finally I would like to refer you to policy SI1: Equality Impact Assessment which requires Local Authorities to conduct Equality Impact Assessments to ensure policies reflect the diverse needs and concerns of the people who will be affected by them. We are currently commissioning further work on this matter in order to provide advice to Local Authorities on this.</p>
0184 Hempsted Residents Association	Comment	Hempsted Landfill	<p>The plan does not address the issue of the future of Hempsted Tip and does not address the issue of community facilities for the increased population arising from development in Hempsted and in the Quays development.</p>

<p>0200</p> <p>The Theatres Trust</p>	<p>Comment</p>	<p>Theatres in the Central Area</p>	<p>The Theatres Trust is an advisory Non-Departmental Public Body and a statutory consultee on planning applications that affect land on which there is a theatre. It was established by The Theatres Trust Act 1976 'to promote the better protection of theatres'. Our main objective is to safeguard theatre use, or the potential for such use, but we also provide expert advice on design, conservation, property and planning matters to theatre operators, local authorities and official bodies.</p> <p>Local authorities are required by Government Order to consult the Trust when considering planning applications affecting land on which there is a theatre. This applies to all theatre buildings, old or new, and regardless of whether or not they are still in use as theatres, in other uses, or disused.</p> <p>Theatres are important community assets and can provide a venue for creative and cultural activities. These include not just performances on stage, but foyer music and exhibitions, pre-performance talks and events. A flourishing arts scene gives a sense of local identity and vitality, and entertains and stimulates local residents and businesses. Audiences coming to a theatre will enliven the surrounding area in the evening, and provide regular custom for local bars and restaurants outside normal working and shopping hours. Both participation in a production or attending a performance can promote social inclusion, particularly as theatres seek to broaden their production policies and attract new audiences, targeting young people and ethnic minority groups in particular.</p>
<p>0299</p> <p>Gloucester Civic Trust</p>	<p>Comment</p>	<p>General Comments</p>	<p>General comments with regard to the Central Area Action Plan from the Civic Trust are as follows:</p> <ol style="list-style-type: none"> 1. The Trust emphasised that the people of Gloucester should be fully listened to during consultations such as this 2. The lack of public toilets in the City Centre is a problem particularly in King's Square and the Bus Station. The idea of self-financing toilet provision was put forward. The Trust feels that quality toilets are essential in the city. 3. Adequate provision should be made for coach parking 4. The trust flagged up the early 4pm closure of Westgate Car Park and the fact that this meant tourists had to depart early 5. It was asked whether the tree in Westgate Car Park has a TPO. This has been checked and there are definitely no TPOs within the car park. 6. The Trust supports the provision of better housing within the central areas and considers it essential that that a better balance and social mix should be provided to ensure sustainability. However, the current policies appear to encourage, almost exclusively, small units of social housing/affordable housing, hostel type/move-on accommodation, at the risk of discriminating against the provision of larger and more comfortable units that would encourage the professional, key workers with greater aspirations to settle. The significant foothold that mainly Housing Associations and others already have and the 'affordable housing' demand in

			<p>anything other than the smallest of developments, has already established this trend unless some flexibility can be introduced. The establishment of ghettos with large blocks of rented housing provided exclusively for disadvantaged mainly single people, helps to create an unnatural and hostile environment to families and those with aspirations of a better environment and living accommodation. The current general perception is that the central areas, in terms of living accommodation is populated by down and outs, with hostels full of drunks and addicts and is an unsafe and unsavoury place to live. The current policies will clearly perpetuate this trend. The introduction of Planning Obligations to better ensure a mix of housing types and sizes, particularly within key sites should be considered.</p>
<p>0414</p> <p>The Countryside Agency</p>	<p>Comment</p>	<p>Local Development Framework</p>	<p>The Countryside Agency Landscape, Access and Recreation Division (LAR) is responsible for advising Government and taking action on issues relating to:</p> <ol style="list-style-type: none"> 1. Conserving and protecting our natural landscapes and all their characteristics 2. Encouraging awareness of, access to and enjoyment of the countryside and green spaces 3. Achieving the sustainable management and use of the countryside <p>Our revised planning policy statement Planning Principles for Landscape, Access and Recreation - moving on from 'Planning Tomorrow's Countryside' is enclosed for your information. This provides advice to local planning authorities, to the Government and to developers on how the planning system should operate and evolve to achieve our LAR objectives.</p> <p>We have also recently published further guidance (with English Nature, English Heritage, and the Environment Agency) on 'Environmental Quality in Spatial Planning - incorporating the natural, built, and historic environment, and rural issues in plans and strategies' which may be of interest. Supplementary files for this publication along with further information and guidance is available on the planning pages of the Countryside Agency website - www.countryside.gov.uk.</p> <p>Because there are so many Local Development Frameworks due to be prepared in the southwest, our limited resources mean that we are unable to respond fully at every stage or on every document. We are likely to become involved in only a number of selected Local Development Framework consultations, and we therefore unable to offer comments in this occasion.</p> <p>We should explain that the absence of comment is simply an expression of our priorities. It should be taken as implying a lack of interest; indeed we are always seeking to promote examples of good practice, so if you consider your Local Development Framework policies demonstrate particularly well how the Countryside Agency's landscape, access and recreation planning principles can be applied, then we would be pleased to hear from you.</p>

0445 Environment Agency	Object	The Environment	<p>In general we support the area specific policy designations (CA.1 - CA.17 as they accord with both the Core Strategy and Development Control Policies.</p> <p>We have concerns that the environment does not appear to be mentioned within the vision or the objectives of the Central Area Action Plan. Whilst we appreciate that the CAAP is fundamentally driving regeneration and delivering planned growth areas, the environment cannot be wholly overlooked.</p>
0445 Environment Agency	Object	Site Allocations within Flood Zones 2 and 3	<p>We are unable to support the site allocations within the identified flood zones 2 and 3, as they have not been informed by a Strategic Flood Risk Assessment (SFRA) or sequential test and do not accord with the principles of preferred option Development Control Policy BNE.10. You have identified in paragraph 4.4 that the western part of the Central Area is within the River Severn floodplain and reduces development opportunities yet this has not been quantified.</p> <p>In considering sites for development it must be demonstrated through a flood risk sequential test that no other site is available in a lower flood risk location. Without such a process being already in place at this stage (preferred options) we cannot see how the plan will be declared sound at the examination stage. Currently the plan fails to be consistent with national planning policy (soundness test IV) and is not founded on a robust and credible evidence base (soundness test VII).</p> <p>In view of this lack of a visible sound evidence base as required in the leading SA/SEA process, the Agency has no option but to object to the Preferred Options Central Area Action Plan.</p> <p>As stated in previous responses, paragraph 51 of PPG 25 states that an LPA should show areas at flood risk within the local plan and apply the principles of the sequential test accordingly. The Consultation draft of PPS 25 also identifies within its key planning objectives that LPA's should prepare and implement planning strategies to help deliver sustainable development by preparing SFRA's. These should be 'appropriate either as part of a Sustainability Appraisal or as a free standing assessment that contributes to that Appraisal'.</p>
0781 Mr Adam Lubanski	Object	Parkway Railway Station	<p>I have yet to hear of any local support for a new parkway railway station. The references in this document imply that this has already been decided. Any proper public consultation would result in the rejection of a parkway station. I am sure that community groups in Gloucester are sufficiently against this proposal to ensure its failure.</p>
0907 Severn Trent	Comment	Water and Sewerage Treatment	<p>STWL would wish the City Council to recognise the need to consider the existence and availability of utility services which would include water supply resources and sewerage facilities when planning future growth and large scale development within the city. Sustainable urban drainage systems also</p>

Water Limited		Infrastructure	<p>need to be considered.</p> <p>It is necessary to recognise that in order to supply existing and new developments and to protect and enhance watercourses, modern and efficient water and sewage treatment facilities are absolutely essential. Through requirements, for example in the Urban Waste Water Treatment Directive (UWWTD) and the Water Framework Directive, new environmental standards require water companies to install and update treatment technology on existing and new sites. Whilst an element of this development is covered by permitted development, planning permission is also required and it is important that both at county and local level, policies are in place to proactively support this essential infrastructure.</p> <p>As a result STWL recommend that the Council should also recognise the need to support water and sewage treatment infrastructure in recognition of its integral role in protecting and enhancing water resources and the associated environment.</p>
0907 Severn Trent Water Limited	Comment	Water and Sewerage Treatment Infrastructure	<p>Severn Trent Water Limited (STWL) fully supports Gloucester City Council's drive towards ensuring sustainable development within the City. For STWL this means specifically considering the adequacy of water supply and sewerage treatment facilities for significant housing or employment allocations. The Central Area Action Plan states that the proposed regeneration of Central Gloucester is likely to provide 3,000 new homes and 2,000 new jobs. STWL welcome the Council's acknowledgement that a possible threat from this objective could be the unreasonable burden on existing services and infrastructure as a result of new development. Therefore future policies need to allow sufficient flexibility to ensure new infrastructure can be developed to service the new development. STWL would also highlight the importance of seeking to capture water efficient systems within new development and the need to protect water resources within the City Council area.</p>
0941 British Waterways South West	Support	General Comment – Priority Areas	<p>British Waterways welcomes the inclusion of priority areas of the Docks, Westgate Island and Quay, and the Canal Corridor.</p>
0942 English Nature	Object	Urban Greenspace	<p>English Nature is Disappointed that the Council has not integrated the concept of urban greenspace in the CAAP. It is important to realise that Public Open Space is not automatically a greenspace. Greenspaces are defined areas where local residents can visit to experience wildlife. Public Open Space, if managed sympathetically for nature, can play a part in delivering this important Government target of ensuring that everyone lives within 300 metres to a greenspace.</p>
0942	Object	Biodiversity	<p>English Nature believes that this plan is weak in delivering biodiversity gains within the Central Area of Gloucester and in this respect is disappointing when compared to the non-central area. It is as, or</p>

English Nature			<p>more important that those living in the centre of urban areas have access to greenspace of wildlife interest.</p> <p>There are occasional references to 'biodiversity' but generally unsupported by biodiversity-related policies from the Core Strategy and therefore lacking any commitment from the Council to have regards for nature conservation within the City.</p>
1144 Mr P Turier	Support	General Comment	The Team should be commended for this far-reaching plan. Would be delighted if the plans for the Canal Corridor are realised. The 'hidden' canal-side on the eastern bank is a real waste of an asset as is the boring riverside in The Quay area.
1271 The Home Builders Federation	Object	Planning Obligations	<p>The HBF is concerned that some of the requirements within the AAP are not consistent with Circular 05/05 paragraph B5 outlining the five planning obligations tests. Planning obligations must only be sought where they meet all five tests.</p> <p>New development must only be required to contribute to provision required to meet the genuine need it creates and must not be expected to contribute to any existing shortfall. This is a fundamental requirement.</p>
1271 The Home Builders Federation	Comment	Dwelling Provision	We welcome the renewal and restructuring of areas using an element of new build. However, the policy should not be prescriptive in terms of the amount of new dwellings which are to be provided as this may compromise the sites ability to deliver high densities which is advocated by emerging national policy PPS3.
1271 The Home Builders Federation	Comment	Housing Market Assessments	It is important to note that Government is placing increased emphasis on Housing Market Assessments. The HBF is concerned that until this work is complete the present policy is not founded on a robust and credible evidence base.
1397 South West of England Regional Development Agency	Comment	Delivery	It is crucial that the strategic objectives set out in the AAP are deliverable within the appropriate timescales. The agency welcomes the preparation of supplementary documents in providing planning briefs for the seven key areas. It will be critical that sufficient skills, capacity and resources are in place in order to manage the delivery of projects in a phased manner and within the anticipated timescales set out in the AAP.

<p>1397</p> <p>South West of England Regional Development Agency</p>	<p>Support</p>	<p>General Comment</p>	<p>The Agency supports the plan's acknowledgement of and alignment with, the Area Regeneration Framework produced by the Gloucester Heritage Urban Regeneration Company. This will be vital to the successful and comprehensive delivery of regeneration in the Central Area.</p>
<p>1408</p> <p>Mr Alex Cooke</p>	<p>Comment</p>	<p>Car Club/Multi-purpose Venue</p>	<p>What is a Car Club?</p> <p>Guildhall capacity is 360 in the Theatre and 120 in the cinema plus conference and meeting rooms. Gloucester could do with another venue, but they are noisy and messy.</p>
<p>1436</p> <p>Art Shape</p>	<p>Comment</p>	<p>Cultural and Social Inclusion</p>	<p>After reading your Local Development Framework draft document Art Shape is concerned to see the lack of cultural and social inclusion within the City Council plans. Art Shape has been involved in the consultation for the GHURC Public Art Strategy and wondered if this document is to accompany the Local Development Framework document? However as we have not see this document yet and how it could potential link into the Local Development Framework we would like to raise the issue of cultural engagement and social inclusion within your draft policy document currently up for consultation and ask how the local communities within these key areas will be actively involved in feeding into this regeneration with a view to giving them ownership and enabling them to work towards some of their own needs, concerns and aspirations. The renewal can then be grown from the people within the areas through creative involvement in the consultation, design, building and landscaping processes?</p> <p>I understand that many agencies and organisations in Gloucester are in regular contact with specific local communities and that the county council also has a community forum and special interest groups that are consulted with. I also understand that this information will be published on the website for public access. However my query is more about the everyday person living in these areas who may not be that well informed and also how to make the regeneration all inclusive, informative, engaging and accessible.</p> <p>Art Shape has done a lot a work around consultation and community development. Art Shape's inclusive public arts process challenges preconceptions of what community-based artwork can be. We would be keen to open up dialogues from the very start of this regeneration programme to strengthen partnerships between local communities, individuals and organisations especially around any new builds, relocation, improvements, changes and refurbishments. Would it be possible to include creative ways to actively engage the communities and businesses through involving the arts or</p>

		<p>artist/s on the regeneration and planning team to work on this aspect of your work?</p> <p>You may be interested in seeing case-studies of interesting and innovative approaches to community-led design and regeneration that are being promoted by the Glasshouse www.glasshouse.org.uk who offer a training course for residents and tenants to get involved in planning, design and creating open spaces within their neighbourhood. As well as looking at how other local authorities have approached city centre regeneration on the PASW website and involve or invite them to talk to the group with PASW (Public art South West) who are managing the PROJECT grants that we could look into applying to support this work with a creative edge see www.project-awards.org.uk</p> <p>Also Creating Excellence -the south west regeneration centre 08003283234 www.creatingexcellence.info who are promoting sustainable design, good architecture, planning and built environments in this region - they have produced introductions to their work called designing our environment towards a better built environment for the south west. Their director has had many years of experience in regeneration and speaks passionately about the subject.</p> <p>Westgate PAG have visited Birmingham this year to see an excellent example of city regeneration and have seen the positive aspirations and identifications it has given it's communities using public art and design to support the social and economic use of the arts in creating ownership and training opportunities within the community - such as Gallery 37 and it's pilot projects, ArtsFest and the building of Ikon Gallery. This visit was an excellent example of the potential that creative and social inclusive practices have to offer in shaping a city such as Gloucester in it's implementation of a successful regeneration programme.</p> <p>Finally but by no means least, with all this regeneration we feel it would be a wonderful opportunity, and one not to be missed, to build on the city council funded Liveability grants to link in social and creative engagement into the core part of the regeneration process, as well as looking at a percent for arts element being developed into the planning departments budgeting considerations within the Gloucester City Council as a way of showcasing good practice in how public art can be included into the regeneration programme, especially when the percent for art policy has recently been lost at County level (for more information see Percent for Art information below published as part of Art Shape's Creating a healthy environment - an inclusive Public Art portfolio promotional document)</p> <p>Percent for Art promotes the inclusion of artwork as a key part of regeneration, both in terms of permanent and temporary pieces in and around new developments. It also can work to draw in the local community, future service users, friends and families, and provide input and support for the organisation and its changing environment.</p>
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			<p>Percent for Art primarily works through local authorities and can be written into their Local Plans as a voluntary scheme that architects and property developers can subscribe to. Percent for Art aims to bring creative benefits to the local community, creating a sense of place and ownership in the new and changing built environments where they live, work or are users in some way.</p> <p>Percent for Art asks the developer/organisation to ring fence at least one percent of the capital budget for a new building, refurbishment, relocation and/or environmental scheme such as pathway networks and garden areas. Percent for Art encourages the involvement of commissioning or collaborating artists, craftspeople, emerging artists, community groups and/or service users from the very beginning of the design process. This will ensure a fully integrated and coherent cost effective scheme in medias such as stained glass, textiles, print, photography, sculpture, metalwork, murals, tiling and paving designs. The built environment is improved by creating more attractive regeneration that promotes and invests in the social and emotional value of good design within the community.</p> <p>Percent for Art can also offer exciting opportunities for collaboration across departments within the health care settings such as education, arts, leisure, rehabilitation and introduction to work. Such collaborations play a vital role in strengthening partnerships and links between individuals and organisations and result in achievements bringing change in health care settings.</p>
<p>1442</p> <p>Cavanna Homes (South West) Limited</p>	Object	Central Area Housing Allocations	<p>Object to the lack of commitment towards family sized accommodation in the Central Area Action Plan. Most residential sites proposed in the Central Area Action Plan are high density which will come forward as flats and apartments. This will exacerbate the imbalance of house types identified in the CAAP SWOT analysis. There will always be a strong demand and need for family sized accommodation and this must form part of the strategy for housing within Gloucester.</p> <p>Suitable sites within and adjoining the Central Area should be allocated at densities which would not restrict the potential for family housing.</p>
<p>1445</p> <p>Gloucestershire County Council</p>	Support	Archaeology and Historic Buildings	<p>The recognition in the Action Plan of the importance of archaeology and historic buildings in Gloucester city, and their role in regeneration, tourism and in the economy generally, is welcomed. The identification of the need for the repair and reuse of historic buildings in the central area is also welcomed and supported.</p> <p>The extent and the importance of below ground archaeological remains are however not always clear in the description of the priority areas, and it is recommended that the text relating to this is strengthened. In particular the sequence of assessment and evaluation, the use of archaeological information in the preparation of development proposals, impact assessment, the policy requirements for the preservation of nationally important sites, and the requirements for the recording of</p>

			<p>archaeological sites before and during development could usefully be set out.</p> <p>It is recommended that consideration is given to including a policy on the treatment of historic buildings within the area covered by the Action Plan. This could cover the need for careful assessment of the importance of buildings in advance of development proposals and the potential need for recording of historic fabric in advance or during development.</p>
1449 Gloucestershire County Council	Comment	Transport Assessment/Travel Plan	<p>Whilst supporting the need for a 'Transport Assessment' and a 'Travel Plan' to accompany applications we have serious concerns and will have to reserve judgment on the cumulative impact of all of this development, for whilst it may be possible for us to model a worst case scenario it would be more constructive for us to ensure that our SATURN model is fully up to date with these proposals and further develop our strategy, and with it our requirements, to accommodate the proposed development and/or mitigate it's impact according to more detailed information on order, timing, mix and exact location and layout as it becomes available.</p>
1449 Gloucestershire County Council	Comment	General Policies Section	<p>We would wish to see an additional Policy added to this section covering Transport Infrastructure requirements. The policy will need to be expressed generally enough to allow for the addition of infrastructure that becomes necessary as a result of the exact nature and impact of future development as well as including those schemes identified as under consideration for Gloucester in the Local Transport Plan 2006 to 2011 at 3.5.3 'New and Improved Infrastructure' (Page 116) These include:</p> <ul style="list-style-type: none"> • A40 (T) junction improvements, including C & G, Elmbridge Court and Over Roundabout. • Westgate Gyratory improvements. • Junction improvements along Eastern Avenue, including Metz Way & St. Barnabas Roundabout. • Walls roundabout, A38 safety and capacity improvements. • ITEC including Gloucestershire Parkway, Park and Ride, Central Severn Vale Express Bus Service. • Park and Ride sites serving Gloucester, in particular from the West.
1449 Gloucestershire County Council	Support	Planning Obligations – Car Clubs	<p>We would support the requirement for contributions towards a City Car Club as a necessary part of the strategy to limit or remove parking provision for new residential dwellings.</p>
1455	Comment	Gypsies and Travellers	<p>FFT is a national charity concerned with issues relating to Gypsies and Travellers. I have recently been appointed as Planning Officer to work with councils regarding the implementation of the new</p>

<p>Friend, Families and Travellers</p>		<p>Government Planning Circular 1/2006 which, if implemented properly and expeditiously, should go a long way to meeting the dire and urgent need for appropriate accommodation for this marginalized group.</p> <p>Their accommodation needs have been ignored for many years in many places and the situation has grown worse over the past 12 years since the repeal of the duty on local authorities to provide sites and following the issue of revised Government planning guidance in 1994. In the context of national and local housing needs and projected development this is a very small issue indeed which should be easy to solve given the necessary goodwill and determination by local authorities to meet accommodation need.</p> <p>The Government has now issued a revised planning circular (1/2006) and a guidance into carrying out Gypsy and Traveller Accommodation Assessments (GTAA's) (ODPM Feb 2006). The assessment of Gypsy and Traveller accommodation needs is a statutory requirement under s.225 of the Housing Act 2004. We would commend the recently published Cambridge Sub-Region Traveller needs assessment carried out by Professor Robert Home and Dr Margaret Greenfields (see Cambridge County Council website) as a model of good practice and community involvement. For general guidance you may find it helpful to look at the website of the Gypsy and Traveller Law Reform Coalition which sets out advice on Gypsy and Traveller accommodation needs and the new planning system (http://travellerslaw.org.uk/press.htm#advice160305). The new circular was in response to the failure of a previous planning circular and a recognition that research has confirmed the link between the lack of good quality sites and poor health and education and employment opportunities for this group. It also states that priority setting is the responsibility of local authorities with the national framework provided by government.</p> <p>This framework includes the aim:</p> <p>'to increase significantly the number of gypsy and traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3-5 years'.</p> <p>It also indicates that transitional arrangements should be put into place in advance of the completion of GTAA's and that where there is pressing need local planning authorities should bring forward DPDs containing site allocations in advance of regional consideration of pitch numbers (p 11-12 Circular 1/2006). I quote from that section:</p> <p>'Where there is clear and immediate need... local planning authorities should bring forward DPDs containing site allocations in advance of regional consideration of pitch numbers, and the completion of the new GTAA's.' .</p>
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			<p>Transitional arrangements should be put into place without delay.</p> <p>FFT has become concerned about the depth and quality of consultation by many local authorities during the development of Core Strategies, LDFs and DPDs. Whilst we are pleased to comment as far as we are able on developing local documentation we are of the opinion, as I am sure a Planning Inspector would agree, that consultation of national organisations over local issues is not sufficient. I would ask what steps you have taken to engage with local groups and the local Gypsy and Traveller community. We are also concerned about the general lack of race equality impact assessments (REIA) in the planning process and ask what steps you have undertaking or are planning to undertake to ensure that a REAI is made and subsequent monitoring carried out. The ODPM has made clear that race equality should be at the heart of the planning process if it is to provide quality services that meet the needs of all groups in the community.</p> <p>I have to hand your documents out for consultation (Central Area Action Plan, Planning Briefs) and cannot find any mention of Gypsy and Traveller accommodation in them.</p> <p>We note that the ODPM caravan counts do register unauthorised camping in your council area. This is evidence of need for those that resort to Gloucester City. I ask what provision you have made or plan to make within your plans to meet their accommodation needs.</p>
<p>1491</p> <p>Quality Assurance Agency for Higher Education</p>	Support	General Comment	<p>Although Gloucester has a number of historic city centre hotels it sorely lacks the facilities that a larger, modern hotel can provide. We are therefore excited that the LDF includes plans to encourage the development of a 4_ hotel in the Greater Blackfriars area. We receive many international visitors at our offices and the lack of good quality city centre hotel accommodation does present a poor image. We are also encouraged by the plans for the redevelopment of the Greater Blackfriars area as a whole as it is a vastly underutilised area which sits on our doorstep and acts as a physical barrier to the integration of the city centre and the docks.</p> <p>QAA staff and visitors have benefited greatly from the redevelopment of the Docks. It has provided much needed public space and retail facilities and of course brought a valuable historic environment back into full use. We read with interest the plans for the development of Southgate Moorings although we understand that the development of this site has been under consideration for some time. Although from a personal point of view development on the site would interfere with the views from Southgate House we are also keen that any construction would be carefully chosen to fit in style and scale with the Docks as a whole. Southgate Moorings currently sits several metres higher than the rest of the Docks and we feel this elevated starting point should be taken into consideration in the scrutiny of any planning application.</p>

			Similar considerations are applicable to the development of the land adjacent to the dry docks. The historic vista of the Docks themselves, of Alexandra Warehouse and the pumping house should be preserved in any redevelopment of this area.
1491 Quality Assurance Agency for Higher Education	Comment	Housing in the Central Area	<p>We are encouraged by the plans to bring back into use or restore the existing housing stock which is present in the city centre. This will help enervate the central area and make it a much more pleasant place.</p> <p>Throughout the LDF plans are included for the construction of new housing. Although their is mention of a proportion of this being allocated to affordable housing we are concerned that the impact of a lack of housing provision which is within reach of the majority of individuals is not fully appreciated. The development of the Docks and of the kand to the east of Gloucestershire Royal Hospital have, quite rightly, been completed to a very high standard but have resulted in a large number of highly priced units being offered, which are beyond the financial reach of many of our staff. This is contrasted with a lack of truly 'affordable' housing close to, or in, the city centre. In light of this, we urge you to give full consideration as to the type and price of further housing developments in the central area.</p>
1491 Quality Assurance Agency for Higher Education	Support	Public Space in the Central Area	<p>Gloucester is currently lacking in sufficient high quality public space in the central area. This has a negative impact both on those who work and those who live in the city centre. The plans to improve the appearance and setting of the Greyfriars monument, return St Michaels Square to a public park area and the continued redevelopment of Kings Square will be of great benefit to all those who live and work in the city centre.</p>
1491 Quality Assurance Agency for Higher Education	Comments	Transport	<p>Whilst many of our employees commute to work from the immediate vicinity, as our business is a specialist one, some travel greater distances from across Gloucestershire and beyond. Out core business operates at a national level and as such our staff travel frequently from Gloucester to every corner of the UK. We also have a significant number of visitors from outside the UK.</p> <p>Rail</p> <p>Overall, the development of the Railway Corridor as an 'iconic gateway' for the City is something that is highly commendable. The state of the railway station itself is however something that desperately needs to be addressed. We understand that the plans for the development of the Gloucester Parkway Station are in their final stages. Although the plans have many laudable features, our worry is that when the focus shifts to a new station, the city centre station will see less rail traffic and thus degrade into an increasingly dilapidated state. The central station may not have the advantage of being on the</p>

			<p>main Bristol-Birmingham line, but it does have the advantage of its location, within easy walking distance of shops and businesses. We hope that this great advantage will not be lost as a consequence of the new development. The withdrawal of the Virgin Train services from Gloucester has already hampered our effectiveness and we would not wish to see any further service deterioration.</p> <p>Bus</p> <p>The redevelopment of the bus station is mentioned throughout the LDF and associated documents and this is a project which is long overdue for execution. Of great priority to us, our staff, and our visitors is not only the quality and attractiveness of this area of the city centre but its role as both a key transport and physical linkage between the rail station and city centre. We would hope to see this interconnectedness reflected in the detail of the developments on this site.</p> <p>Car</p> <p>We are pleased to see that the LDF envisages retaining the overall number of city centre car parking spaces. Although we support our staff to use public transport we accept that many have no choice but to use their cars to get to work. The needs of commuters, as well as shoppers, should also be taken into consideration in any redevelopment or reallocation of city centre parking.</p>
1702 Mr John Rednar	Comment	General Comment	Should try and get a state of the art snooker facility which can draw large events - chance to get onto the map.
<u>The Central Area</u>			
0941 British Waterways South West	Support	Paragraph 3.14	British Waterways supports proposals to improve pedestrian links between the City Centre and the Western Waterfront area. This is essential in maximising the use of the Docks and the Gloucester Quays area.
0941 British Waterways	Support	Paragraphs 3.14 – 3.18	British Waterways welcomes the inclusion of the Canal Corridor as a strategic focus for the CAAP.

South West			
<u>Strengths, Weaknesses, Opportunities and Threats (SWOT)</u>			
<u>Paragraphs 4.1 – 4.8</u>			
0629 Robert Hitchens Limited	Object	Paragraph 4.7	<p>Object to the assertion that large-scale urban extensions would hamper regeneration of the Central Area. The City Council has acknowledged previously that the redevelopment of RAFQ is not hampering City Centre regeneration. Development north of Gloucester will have little overlap with the Central Area and will not detract from regeneration (separate report on housing market issues submitted).</p> <p>An urban extension to the north of Gloucester would in fact support the regeneration of the Central Area and lead to increased spend supporting additional retail floorspace, recreation and leisure facilities.</p> <p>An urban extension should therefore be seen as an opportunity rather than a threat and instead of seeking to phase the development, the document should be seeking to actively support its early development. The same does not apply to development south of Gloucester and this should be identified as a threat with the dwellings re-allocated to the north of Gloucester. Paragraph 4.7 (1) add 'south of' between 'extensions to' and 'Gloucester'. Insert reference to urban extension north of Gloucester under 'opportunities'.</p>
<u>The Vision</u>			
<u>Paragraphs 5.1 – 5.9</u>			
0200 The Theatres Trust	Support	The Vision	The Theatres Trust is pleased to see that Gloucester recognises the economic importance of its cultural assets and we support The Vision at 5.6 regarding Tourism, Leisure and Culture and that the regeneration of the Central Area will provide new cultural facilities to compliment the New Olympus Theatre and The Kings Theatre. We also note on page 58 that the Blackfriars district is considered to have the potential to become a creative and cultural quarter.
0941 British Waterways	Object	Paragraph 5.4	The last sentence of this paragraph suggests that the focus for the canal corridor will be on employment use. Although British Waterways supports employment use, there are opportunities for mixed-use developments in this area. Indeed the plans also suggest that mixed-use will be acceptable along much of this length.

South West			
<u>The Strategy</u>			
<u>Paragraphs 6.1 – 6.73</u>			
0041 West Gloucestershire Primary Care Trust	Object	Strategic Objective 6	<p>Paragraph 6.52 - we would like to see point 1 targeting low skilled and the long-term unemployed. Also we would like to see opportunities for part-time employment to enable people to have phased return to work i.e. ill people or mothers returning to work.</p> <p>Point 6 - We would like to see this work being targeted at quintiles 1 and 2 in terms of cost and enabling measures in terms of support etc.</p>
0171	Support	Strategic Objectives	<p>The principles of the 11 strategic objectives identified are supported. Further clarification is required with regards to the strategic objective 3. It is suggested that this could be presented in a clearer and more concise way.</p> <p>Further clarification is required as to whether these are set in order of importance hierarchy.</p> <p>It is recommended that an additional strategic objective is inserted to address housing needs and provision within the Central Area: this should make reference to the provision of affordable housing.</p>
0236 Mr M Aplin	Object	Strategy	<p>The objective itself is appropriate and too general to be objectionable, however I have strong reservations about the evidence base for the LDF to achieve this. My primary concern is that there is a lack of applicable information on which office uses for sites have been considered and the Plan is thus unsound. Moreover this is associated with a contravention of national policy in allocating employment intensive uses.</p> <p>Gloucester has developed unsustainably partly because the growth in jobs has largely been planned through peripheral sites, which has contributed to the undermining of the City Centre. The expenditure of office workers is desperately needed in the central area, and additionally it is questionable (apart from certain HQ type establishments) if Gloucester can succeed as a contemporary city with modern business space if it continues to be dispersed across the city. In a competitive environment offices need to be concentrated to reach a critical mass to make supporting facilities viable. This was raised by sub-regional and regional level government in the Issues and Options consultation. Thus the LPA should adhere to government policy and apply the sequential approach to site selection (which does apply to office use in addition to retail) to put the City Centre first for commercial development. PPS6</p>

			<p>includes offices (para. 1.8) and must be implemented in order for the ambition within the AAP to materialise.</p> <p>I will raise objections to some specific sites on this basis, but the principle also applies to your development control practices. For administrative ease I am not going to object to all individually where the site proposal is good. However I calculate that half the office capacity (or use descriptions that may include offices) you identify in this AAP is outside of what is recognised locally as (or can link directly to) the City Centre/Gate Streets (Railway land, BT Depot, Cedar House). Policies should rule out B1 development if office development is not envisaged as appropriate. These locations are unlikely to attract any significant amount of B1b & B1c.</p> <p>Secondly I object to the simplistic approach to 'employment land'. LDF evidence base requirements are taxing overall, but I think given the limited information available policies have to be more tightly worded -and more prescriptive if it will help support central locations. This would ensure the City's position is robust in the scenario of major speculative developers using the appeals route. Specifically I simply cannot see how the approach of 'employment land' needs is good enough qualitatively. The specifications of B1 users are so different to distribution and industry in a multitude of respects, as well as the critical issues of 'sustainability' (traffic, town centre viability) there are the practical issues of the kind of vehicles, time of use, servicing requirements, built form, compatibility as mixed use, compatibility with neighbours (residential amenity characterises B1 by definition) and indeed skills. This problem devalues the Core Strategy also. The AAP must be refined in this respect, and it is to be hoped your views on matters such as housing land availability is not undermined by the simplistic monitoring led approach.</p> <p>I welcome the AAP and many of its objectives, but regard it to be in contravention of PPS6 (para 2.39 in particular) and object to the City's approach to office development.</p>
0941 British Waterways South West	Support	Paragraph 6.17	<p>British Waterways supports in principle proposals for a new riverside walk at Westgate Quay and a new canal-side walkway along the eastern bank of the canal. Details will need to be discussed with British Waterways and strategic approach will need to be taken where there are a number of ownerships. The expectation would be that such footpaths will be funded by S106 agreements attached to any planning permissions affecting these lengths.</p>
0941 British Waterways South West	Support	6.42 - 6.50	<p>British Waterways supports this objective, but it is surprising that the supporting text does not recognise that important contribution that Gloucester Quays will make to the retail offer in the City.</p>

0941 British Waterways South West	Support	6.53 - 6.56	This is welcomed by British Waterways. There is also scope for a new river crossing adjacent to the West Quay of the Docks that could help to bring visitors into the Docks/Quay area.
1304 Bennett's Coaches	Support	Paragraph 6.31	Support efforts to create a '...sense of arrival at the historic core'.
1449 Gloucestershire County Council	Support	Strategic Objective 6	We would support the intention of reducing traffic congestion. However our concern is that to achieve this aim greater emphasis should be given, in Section 9 'General Policies', to the essential contribution that Park and Ride will need to make (which is recognised in paragraph 9.29).

Policies

<u>Policy CA.1 – City Centre Boundary</u>			
<u>Paragraphs 7.2 – 7.7</u>			
0171 Bovis Homes Limited	Support	Policy CA.1 - City Centre Boundary	We support this policy however we recommend that retail use should be included in the criteria as a use that would be appropriate in the City Centre.
0202 MWA Planning and Development Consultancy	Object	CA1 - City Centre Boundary	<p>The City Centre boundary as defined should include the former B_Q site given that as drafted it includes the whole of Gloucester Park and cricket ground. It also includes Westgate Island - allocated for limited comparison goods retailing. Both of these are significantly further from the Primary Shopping Area than the former B&Q site.</p> <p>Policy CA1 should refer to retail development in addition to the other uses listed. There also appears to be some inconsistency when applying the sequential approach. Reference is made at paragraph 7.3 to locating identified uses within 300m from the City Centre boundary however the Council should ensure their approach is consistent with national policy which says 300m from the Primary Shopping Area. Policy CA1 should not seek to exclude retail development if the 300m distance is being applied to other types of town centre use.</p>
1444 Gloucestershire County Council	Object	CA.1 - City Centre Boundary	The GHURC, supported by the County Council (and indeed Gloucester City Council) envisage some level of residential development within the identified City Centre boundary. Whilst Policy CA35 is acknowledged, this should also be reflected in this policy.
1449 Gloucestershire County Council	Support	CA.1 - City Centre Boundary	We welcome the commitment, made in Policy CA1 'City Centre Boundary', to reduce car travel by 'expecting' that office uses, which are high trip generators, will be located within the City Centre boundary and acknowledge that the exception introduced into this policy in paragraph 7.3, of the supporting text, is an acceptable application of the 'sequential test'. However the statement that, 'Only in exceptional circumstances, will permission be granted for these types of development in 'out of centre' locations" seems to be at odds with the identification of such uses in 'out of centre' locations such as the Railway Triangle (Policy CA23) and the BT Depot (Policy CA28). Such uses will have to be justified.

<p>1353</p> <p>Morley Fund Management Limited</p>	<p>Object</p>	<p>CA.1 - City Centre Boundary</p>	<p>The boundary designation for the City Centre area does not tally with the boundary contained within the SPD for Kings Square and the Bus Station. The City Centre designation needs to be consistent in all documents. We would seek to ensure that the City Centre boundary is drawn to encompass the entire defined Kings Square and Bus Station Priority Area.</p> <p>A comprehensive redevelopment of Kings Square and the Bus Station should include the former Dunelm and Courts site to ensure that a comprehensive redevelopment can occur. If this site is not included within the City Centre boundary, as defined in Appendix 1 of the CAAP, the policy context for the emerging SPD for this area will have conflicting policy objectives as the former Courts and Dunelm site will fall outside of the City Centre boundary.</p> <p>Appendix 1 of the CAAP correctly indicates that the former Courts and Dunelm site is located within the CAAP boundary. This is in line with the inclusion of the site within the planning brief.</p> <p>However, the site is not included in the City Centre boundary as provided in Appendix 2. As the site is located within the CAAP boundary it should be included within the City Centre boundary on the proposals map.</p> <p>The location of the site within the CAAP boundary and City Centre boundary should be consistent in each document that forms part of the LDF. We therefore object in principle to Policy CA.1.</p>
<p>1441</p> <p>Duddington House Properties</p>	<p>Object</p>	<p>CA.1 - City Centre Boundary</p>	<p>This policy is currently worded as follows:</p> <p>We will expect the following uses to be located within the City Centre boundary:</p> <ul style="list-style-type: none"> - Leisure, entertainment and intensive sport and recreation uses - Offices - Arts, culture and tourist uses <p>Strategic Objective 9 of the Area Action is 'To raise perceptions in respect of City Centre living'. The supporting text states that 'the population density of the Central Area is low. The lack of resident population particularly in and around the commercial core contributes to a lack of vitality and absence of activity in the evening, particularly during the week.'</p> <p>However there is no policy within the Area Action Plan that specifically supports the development of housing within the City Centre boundary.</p> <p>We consider this policy should have housing listed as a suitable use to be located within the City</p>

			Centre.
1590 Peel Developments UK Limited	Comment	CA.1 - City Centre Boundary	The City Centre policy, CA.1, appears to not be entirely consistent with PPS 6 which refers also to retail as one of the key issues within a city centre in addition to those listed in the draft policy (see for example paragraphs 1.8, 2.16, 2.28 - 2.31, 2.33 - 2.50 of PPS6).
1502	Object	CA.1 - City Centre Boundary	<p>The boundary designation for the City Centre area does not tally with the boundary contained within the SPD, The city centre designation needs to be consistent in all LDF documents. We would seek to ensure that the city centre boundary is drawn to encompass the entire defined Kings Square and Bus Station area, thus including for former Courts and Dunelm buildings.</p> <p>A comprehensive redevelopment of this area should include the former Courts and Dunelm site to ensure that a comprehensive redevelopment can occur. If this site is not included within the city centre boundary, as defined in Appendix 1 of the CAAP, the policy context for the emerging SPD for this area will have conflicting policy objectives as the former Courts and Dunelm site will fall outside the City boundary.</p> <p>Appendix 1 of the CAAP correctly indicates that the former Courts and Dunelm site is located within the CAAP boundary. This is in line with the inclusion of the site within the Kings Square and Bus Station Planning Brief.</p> <p>However, this site is not included in the City Centre boundary as provided at Appendix 2. As the site is located within the CAAP boundary it should be included within the city centre boundary on the proposals map.</p> <p>The location of this site within the CAAP boundary and city centre boundary should be consistent in each document that forms part of the LDF. We therefore object in principle to policy CA.1.</p>
<u>Policy CA.2 – Primary Shopping Area</u>			
<u>Paragraphs 7.8 – 7.14</u>			
0171 Bovis Homes Limited	Support	Policy CA.2 - Primary Shopping Area	We support this policy in principle however this should not prevent other uses such as restaurants, bars, casinos, that would complement retail use and would be appropriate in the primary shopping area in providing vitality.

0202 MWA Planning and Development Consultancy	Support	CA2 - Primary Shopping Area	The extension of the Primary Shopping Area along Eastgate Street is supported.
1353 Morley Fund Management Limited	Object	CA.2 - Primary Shopping Area	<p>The policy and the supporting text currently states that the Primary Shopping Area will be the focus for new retail development and that within the PSA Kings Square and the Bus Station will be the main focus for new retail.</p> <p>We object to the current PSA boundary as the designated area does not take into consideration the entire Kings Square and Bus Station area as defined within the emerging SPD. This therefore will lead to a conflicting policy stance whereby the policy seeks to encourage new retail and development within the PSA and therefore Kings Square/ Bus Station but the designated area precludes development in certain areas.</p>
1502 Morley Pooled Pensions Limited	Object	CA.2 - Primary Shopping Area	<p>The policy and the supporting text currently states that the Primary Shopping Area will be the focus for new retail development and that within the PSA Kings Square and the Bus Station will be the main focus for this new retail.</p> <p>We object to the current PSA boundary as the designated area does not take into consideration the entire Kings Square and Bus Station site as defined in the emerging SPD. This therefore will lead to a conflicting policy stance whereby the policy seeks to encourage new retail development within the PSA and therefore the Kings Square and Bus Station Area but the designated area precludes development in certain areas.</p> <p>The PSA should be widened to include the former Courts and Dunelm buildings which form part of priority area 3 and are currently in retail use.</p>
<u>Policy CA.4 – Retention and Provision of Family Housing in the Central Area</u>			
<u>Paragraphs 7.18 – 7.21</u>			
0171 Bovis Homes Limited	Object	Policy CA.4 - Family Housing	This is a very restrictive policy. The Council should not have the ability to determine the mix of housing on new development sites. This approach is not supported in national or regional planning policy. The mix of housing on new development sites should be market led in which house builders have an excellent understanding of.

			<p>The policy also seems to be contrary to national and regional planning policy in particular the requirement to make the most efficient use of land.</p> <p>We fail to see how the proposed policy relates to the overarching aims of national and regional policy and request that it is deleted.</p>
<p>1271</p> <p>The Home Builders Federation</p>	Object	CA.4 - Family Housing	<p>The HBF objects to Policy CA4, it is considered that the AAP should not attempt to influence dwelling type. Market led provision is based on carefully researched criteria and developers do not base decisions lightly. It is therefore inappropriate to dictate dwelling mix without proper consideration of the specific requirements within the locality of a development site. Such a strategy will only result in unsuitable and inappropriate provision and may result in slowing down the rate of provision or some sites not coming forward as uneconomic requirements are placed on them.</p>
<p>1353</p> <p>Morley Fund Management Limited</p>	Object	CA.4 - Family Housing	<p>We object to the wording of Policy CA.4 and the requirement for the provision of family housing in large development schemes within the Central Area.</p> <p>The policy as it stands does not define the phrase 'family housing' and therefore no indication is given by the document of the type of housing that the Council wish to see provided within the Central Area.</p> <p>Whilst a redevelopment scheme could provide a mix of dwellings in terms of size and tenures, it is not realistic for policy CA.4 to assert the requirements that family housing is provided in all Central Area locations.</p> <p>It is not possible to provide houses within large-scale, mixed-use, retail led, town centre redevelopment projects. We therefore object in principle to this policy and would wish to see the inclusion of a definition of family housing and an amendment to the current third paragraph of the policy along the lines of:</p> <p>'Large scale development schemes within the defined Central Area could, where deemed appropriate in terms of location and development proposed, be required to provide an element of affordable housing as part of the overall mix of residential units'.</p>
<p>1441</p> <p>Duddington House Properties</p>	Object	CA.4 - Family Housing	<p>Policy CA4 indicates that:</p> <p>'Large development schemes within the Central Area providing more than 10 dwellings shall provide family housing as part of the overall mix of residential units.'</p> <p>However, family housing will not always be appropriate in all locations. In line with government guidance the policy approved should be to increase densities and maximise the development potential</p>

			<p>of city centre sites as appropriate. Family housing may not always be appropriate in such instances, particularly as part of mixed-use development and where private amenity space more suited to families cannot be provided. This is recognized in Policy CA36 which refers to provision of family housing 'on appropriate sites'. Additionally, as far as can be reasonably controlled within land use policies, the dwelling mix of a development and the likely life styles of intended inhabitants should be compatible.</p> <p>The Area Action Plan should provide flexibility for developers to provide an appropriate dwelling mix on each site. We consider the policy should be reworded as follows:</p> <p>'Large development schemes within the Central Area providing more than 10 dwellings will be encouraged to provide family housing, where appropriate and having regard to the characteristics of the site.'</p>
1526 Geraldine Gregory-Davis	Support	CA.4 - Family Housing	<p>This section is pure common sense which will help stem the spread of flats and apartments. The mix on larger schemes should be in favour of high class family homes.</p>
<u>Policy CA.5 – Air Quality Management Areas</u>			
<u>Paragraphs 7.22 – 7.26</u>			
0171 Bovis Homes Limited	Comment	Policy CA.5 - AQMA	<p>Further clarification is required with regards to Air Quality Management Areas and how these areas are identified.</p> <p>We would like to withhold any comments until further information is available.</p>
<u>Policy CA.6 – Views and Skyline</u>			
<u>Paragraphs 7.27 – 7.32</u>			
1353 Morley Fund Management	Object	CA.6 - Views and Skyline	<p>We object to this policy as it does not provide a justification in terms of the urban design principles used to designate these key views. We therefore seek that the justification is expanded to include the rationale behind the designation of these key views.</p>

Limited			<p>In addition, the major redevelopment of the Kings Square and Bus Station area, as outlined in both the CAAP and SPD , is envisaged to provide a remodelled or relocated multi-storey car park along with residential development above ground floor retail units. The wording of the policy as it stands does not take into consideration the existing heights and locations of buildings. We seek an amendment to the policy as follows:</p> <p>'Proposed development SHOULD, WHERE PRACTICLE AND POSSIBLE, SEEK TO RESPECT THE City Skyline, important views and vistas within the City, views of surrounding countryside from within the City, and views of the City from the countryside.</p> <p>It will be particularly important to protect views of the Cathedral and the Docks.</p> <p>Development that could adversely affect important views including those identified on the proposals map MAY ONLY BE PERMITTED IN EXCEPTIONAL CIRCUMSTANCES'.</p>
1502 Morley Pooled Pensions Limited	Object	CA.6 - Views and Skyline	<p>We object to this policy as it does not provide a justification in terms of the urban design principles used to designate these key views. We therefore seek that the justification is expanded to include the rationale behind the designation of these key views.</p> <p>The wording of the policy as it stands does not take into consideration the existing heights and location of buildings. We seek an amendment to the policy as follows:</p> <p>'Proposed development SHOULD, WHERE PRACTICAL AND POSSIBLE, SEEK TO RESPECT THE City skyline, important views and vistas within the City, views of surrounding countryside from within the City, and views of the City from the countryside.</p> <p>It will be particularly important to protect views of the Cathedral and Docks.</p> <p>Development that could adversely affect important views including those identified on the proposals map MAY ONLY BE PERMITTED IN EXCEPTIONAL CIRCUMSTANCES'.</p>
<p><u>Policy CA.7 – Public Open Space and Private Playing Fields</u></p> <p><u>Paragraphs 7.33 – 7.40</u></p>			
0171 Bovis Homes	Object	Policy CA.7 - POS/Playing Fields	<p>The importance of open space within the central area is noted.</p> <p>The protection of all areas of open space and an inflexible approach. Open space should only be</p>

Limited			<p>safeguarded if there is a demonstrable shortage of open space within the central area. This should be informed by an up-to-date open space assessment.</p> <p>If an open space assessment identifies a shortage of open space in the central area, then existing open space areas should be safeguarded, unless:</p> <ol style="list-style-type: none"> 1. The proposed development provides a like for like replacement within the local area 2. Funds are made available to improve the quality of the open space within the Central Area 3. Better use of the open space is provided. <p>We recommend that the policy is amended to take into consideration the above comments.</p> <p>Regardless, the policy appears to replicate Policy LR.1 and we question whether this is required.</p>
0942 English Nature	Comment	Policy CA.7 - POS/Playing Fields	<p>There is an acknowledgement under this policy for potential opportunities for flora and fauna in open spaces but this statement needs to be explained. Will opportunities be the result of a voluntary code, or ideally will nature conservation be an integral component of any open spaces proposed within the Central Area_</p>
<p><u>Policy CA.8 – Floodplain</u></p> <p><u>Paragraphs 7.41 – 7.46</u></p>			
0171 Bovis Homes Limited	Comment	Policy CA.8 - Floodplain	<p>Is the policy suggesting that no new high risk development (i.e. residential) will be permitted in the areas identified on the proposals map as floodplain?</p> <p>The policy requires further clarification.</p>
0445 Environment Agency	Object	Policy CA.8 - Floodplain	<p>The policy as highlighted within the document is simply a statement that identifies the flood plain on the proposals map and has no substance or implications. It is presumed that this proposed policy is missing additional advice (for example Policy SAD.8 of the Non-Central Area document makes more sense as it is cross referenced to policy BNE.10).</p>
0907 Severn Trent Water Limited	Comment	Policy CA.8 - Floodplain	<p>Due to the need to abstract water or discharge into watercourses the location of water and sewage treatment works will by necessity often be in the river floodplain. This is for existing development as well as new infrastructure.</p> <p>This situation is recognised within the recent consultation for revisions to PPG25: Development and Flood Risk, with both sewerage and water treatment plants and associated pumping stations</p>

			highlighted as water compatible uses under the Flood Risk Vulnerability Classification. It is important that this location specific feature of water utility infrastructure is recognised within Policy CA.8.
<u>Policy CA.9 – Sites of Nature Conservation Interest</u>			
<u>Paragraphs 7.47 – 7.51</u>			
0445 Environment Agency	Object	Policy CA.9 - Nature Conservation	See comments to policy CA.8. This policy is also just a statement.
0942 English Nature	Support	Policy CA.9 - SNCI's	English Nature welcomes the commitment to protect two designated sites of nature conservation interest within the Central Area.
1446 Gloucestershire County Council	Support	CA.9 - SNCI	<p>A policy (CA9) to protect Sites of Nature Conservation Interest is welcomed. These sites, which are identified by the City Council, may be considered as Local Sites with similar status to Key Wildlife Sites elsewhere in the County.</p> <p>Paragraph 7.49 recognises that sometimes brownfield land can have a biodiversity interest (e.g. invertebrates). This means that the planned redevelopment of significant brownfield land could have some adverse ecological impact. The Core Strategy has a strategic objective to enhance and conserve biodiversity so the Central Area Action Plan will provide a challenge that hopefully can be successfully met.</p> <p>PPS9 Biodiversity & Geological Conservation (paragraphs 4, 5, 9, 12 & 13) and DEFRA's guidance on Local Sites (paragraphs 5, 6 & 7) back up the approach being offered for biodiversity in this Area Action Plan. The Urban Habitat Action Plan in the Biodiversity Action Plan for Gloucestershire (2000) is particularly relevant to Gloucester.</p>
<u>Policy CA.10 – Conservation Areas</u>			
<u>Paragraphs 7.52 – 7.56</u>			
1353 Morley Fund	Object	CA.10 - Conservation Areas	The object to the 'Old Sorting Office' located within the former Courts and Dunelm site, being allocated as part of the Ermine Street Conservation Area. Former applications in relation to the building have confirmed that the Council considers the building is of low status, that it does not form a significant

Management Limited			<p>contribution to the fabric of the streetscene of the Ermine Street Conservation Area and that it would be acceptable to demolish the building provided that a replacement building is developed in its place.</p> <p>The designation of the 'Old Sorting Office' could severely compromise the ability of the site to form part of a wider regeneration initiative that is proposed for the Kings Square and Bus Station Area, as established within an SPD for the site.</p> <p>We therefore seek that the boundary of the Ermine Street Conservation Area is redrawn to exclude this building from the Conservation Area.</p>
<p><u>Policy CA.11 – Areas of Principle Archaeological Interest</u></p> <p><u>Paragraphs 7.57 – 7.63</u></p>			
0171 Bovis Homes Limited	Support	Policy CA.11 - APAI	<p>In principle this policy is supported however we fail to see how the Council have identified which areas are of principle archaeological interest. Further information is required on the procedure the Council went through to identify these areas.</p>
1445 Gloucestershire County Council	Object	CA.11 - APAI	<p>This policy covers the historic core of the city and other selected locations. However, in addition, there will be archaeological remains which lie outside this area. It is therefore recommended that it is made clear in the text that developers may encounter sites outside the Areas of Principal Archaeological Interest where archaeological issues will arise and requirements for evaluation or mitigation of impact.</p> <p>The boundary of the area on the proposals map is in places difficult to distinguish from other designations.</p> <p>There is no indication as to the date at which the boundary of the area was drawn - has it been reviewed recently in order to take account of recent developments and archaeological discoveries in the course of them? Should the Plan indicate the date at which the boundary was drawn, and when it will be next reviewed?</p> <p>It is recommended that there is a clear statement of the development control policies that will be applied within this area, and whether they differ from policies outside.</p>

Policy CA.12 – Scheduled Ancient Monuments

Paragraphs 7.64 – 7.68

1445 Gloucestershire County Council	Object	CA.12 - SAM's	In order to clarify the policy a slight change is suggested to the wording as follows: insert and would not adversely affect the monument itself after 'unless the development would enhance the character and setting of that monument.'
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Policy CA.13 – Cordon Sanitaire

Paragraphs 7.69 – 7.78

0171 Bovis Homes Limited	Comment	Policy CA.13 - Netheridge	Further information is required as to what types of development the Council feel is suitable and unsuitable within the Cordon Sanitaire.
0184 Hempsted Residents' Association	Support	CA13 - Cordon Sanitaire	Policy is supported.
0202 MWA Planning and Development Consultancy	Object	CA13 - Netheridge Sewage Works	Council's justification for maintaining the cordon is flawed. The policy is a legacy of previous circumstances and technical work undertaken by Environ on behalf of BT indicates that it is no longer needed. Receipt of one or two complaints per year does not justify retaining the cordon. Delete BT site from Cordon Sanitaire.
0907 Severn Trent Water Limited	Support	Policy CA.13 - Netheridge	Severn Trent Water Limited (STWL) does not have a rigid Cordon Sanitaire policy that would apply to all sewage treatment works, Instead STWL seeks to work with local planning authorities to establish the most appropriate type of development adjacent to a sewage treatment works on a case by case basis. This can either be through responding to third party planning applications where appropriate or through local plan policies.

			STWL continues to support in principal Gloucester City Council's policy with regard to considering the appropriateness of allowing development in close proximity specifically to Netheridge Sewage Treatment Works, where it is reasonable to believe the development type is likely to be particularly sensitive to odour. Sensitive uses could include residential, food and drink, etc. There may be other less sensitive development such as industry, utilities or temporary/event type development that could be acceptable, and this would need to be viewed on a case by case basis.
1442 Cavanna Homes (South West) Limited	Object	CA13 - Cordon Sanitaire	<p>Object to the Cordon Sanitaire. It is inappropriate to roll forward the existing cordon from the Local Plan when upgrades and technological advancements to the sewerage systems and improvements to the quality of treatment standards mean that there is scope to reduce the cordon.</p> <p>The cordon extends to 800m but the standard is now between 25 and 400m according to the type of processes carried out, size of works, effluents involved, adjoining land uses, any anticipated extensions and site topography.</p> <p>The cordon should be redefined to a maximum distance of 400m to reflect more accurately the area within which development may be affected by the sewage works.</p>

Policy CA.14 – Landscape Conservation Areas

Paragraphs 7.79 – 7.88

0171 Bovis Homes Limited	Object	Policy CA.14 - LCA's	<p>This is a very restrictive policy. The Council should not identify Landscape Conservation Areas. This approach is not supported in national or regional planning policy. Recent Government advice has tried to deter local authorities from identifying local landscape designations.</p> <p>This policy is contrary to national and regional planning policy in particular the recent Government advice and we request that it is deleted.</p>
0184 Hempsted Resident's Association	Support	CA14 - Landscape Conservation Area	Policy supported.

Policy CA.16 – South West Bypass and St Anne's Way Bridge Link

Paragraphs 7.94 – 7.98

0184 Hempsted Residents' Association	Object	CA16 - SW Bypass and St. Anne's Way	This policy should reflect the effect of increased traffic movements on Hempsted Lane and should provide for the improvement of the length of the bypass between Monks Corner and the Colin Campbell together with inherent traffic control improvements at the Monks Corner junction. The closure of The Quay and Commercial Road will undoubtedly have significant impact on surrounding roads of which the bypass is one.
0941 British Waterways South West	Support	Policy CA.16 - St Anne's Way	British Waterways welcomes this policy to safeguard St Anne's Way bridge link and the subsequent improvement of linkages between the Western Waterfront and the City Centre.
<u>Policy CA.17 – Bus Priority Routes</u>			
<u>Paragraphs 7.99 – 7.102</u>			
1450 Gloucestershire County Council	Support	Policy CA.17 – Bus Priority Routes	Support but the County Council should be included as Strategic Transportation Authority in implementing bus priority routes. Amend: "To enable buses to make trips quicker than the private car, bus priority measures such as bus lanes and bus priority at junctions will be introduced in association with Bus Quality Partnerships between the City Council, Gloucestershire County Council and the service operators."
<u>Policy CA.18 – Greater Greyfriars (Priority Area 1)</u>			
<u>Paragraphs 8.11 – 8.65</u>			
0171 Bovis Homes Limited	Comment	Policy CA.18 - Greater Greyfriars	Standard paragraph for policies CA.18 - CA.32. The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated. Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.

			We would like to withhold further comment on these individual sites.
1445 Gloucestershire County Council	Comment	Priority Area 1 - Greater Greyfriars	<p>The recognition of the importance of the Greyfriars monument is welcomed and supported, as are the intentions to improve its setting.</p> <p>The whole of this site is of archaeological significance. On the Gloscat main site both the defences of the Roman town and Roman occupation within the town are known to survive. Part of this site is scheduled as an ancient monument but the whole of it should be regarded as a site of national importance. Archaeological assessment and evaluation has been undertaken on this site and the Gloscat media site, and the information from this work should inform the design of new development. In line with national and local planning policies there should be a presumption in favour of the preservation of nationally important archaeological remains; the retention of the existing Gloscat building would assist in achieving this objective since it would minimise new ground disturbance.</p> <p>In order to ensure that developers are aware of the magnitude of the archaeological issues on this site it is recommended that the text relating to this is strengthened and that under 'site specific obligations' the existing point 'archaeological assessment' is replaced by a paragraph covering not only assessment but, in addition, the process set out in paragraph two of these comments above.</p>
1449 Gloucestershire County Council	Object	Priority Area 1 - Greater Greyfriars	The ratio of 0.5 car parking spaces per residential unit is expressed, in the 'Traffic and Transport' section, as a maximum. We would question whether this should in fact be an average and request that a maximum is set in line with the Local Transport Plan, as adopted in the Development Control Policies LDD (Preferred Options Consultation Paper) at Appendix 2.
1426 City Centre Community Partnership	Comment	Greater Greyfriars	<ul style="list-style-type: none"> - This document appeared vague and non-specific and as such impacted on the comments brought forward. - The retention of the Market Hall was considered important as this not only provides useful facilities for people who live in the city (of which there will be more) but also forms part of the heritage of the city. - People were in favour of the re-creation of small walkways.
1441 Duddington House Properties	Object	CA.18 - Greater Greyfriars	<p>We consider the site of the former 'Jumpin Jacks' nightclub at 7 Brunswick Road should be included within this policy as a development site. We recommend the wording should be as follows:</p> <p>Former Jumpin Jacks Nightclub</p> <p>Mixed-use redevelopment providing retail or restaurant uses at ground floor level with residential above.</p>

			<p>Indicative Capacity/Floorspace</p> <p>- approximately 700 sq. m restaurant or retail - 21 dwellings</p> <p>Site Specific Obligations.</p> <p>None.</p>
1547 Mr John Jackson	Object	CA18 - Greater Greyfriars	Support the proposed development provided it is high quality housing and commercial. The area is in need of investment. It would be of great benefit if Eastgate Street were to be included. It has some very important historic properties but only seems to attract investment in takeaways and bars. This area should be considered for inclusion.
1552 Mr Jim Ward	Support	CA18 - Greater Greyfriars	Strongly support any improvements to this area. Any development should consider access to the rear of Suffolk House as this would help residents who have the daily struggle of finding a parking space after work in this very busy area.

Policy CA.19 – Greater Blackfriars (Priority Area 2)

Paragraphs 8.66 – 8.97

0236 Mr M Aplin	Object	CA.19 - Blackfriars	<p>The policy statement itself does not sufficiently draw out;</p> <p>The need for a development form with enhanced legibility, in addition to retaining permeability.</p> <p>The integral role of a hierarchy of open streets in a fine-grained design solution.</p> <p>How it will be decided if the extent of active frontage is significant enough to function as a key connector drawing people through, whilst promoting a quantum and form of shop uses commensurate with a specialist retail function.</p> <p>These are all imperative as the site is the critical link between established retail areas such as the 'Gate streets and the Docks. The site policy does not seek a single main anchor to drive footfall, and it must thus ensure that this is resisted effectively, creates street patterns with historic resonance - yet is popular.</p>
0171	Comment	Policy CA.19 -	Standard paragraph for policies CA.18 - CA.32.

Bovis Homes Limited		Greater Blackfriars	<p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0445 Environment Agency	Comment	Priority Site 2 - Greater Blackfriars	The western part of this proposed allocation lies within Flood Zone 3. Site-specific obligations for development should include contributions to flood defences.
0200 The Theatres Trust	Support	CA.19 - Blackfriars	We support Policy CA19 and Policy CA52 which support new theatre venues, however, we would remind you that theatres are very complex buildings technically and do need to be very carefully planned both inside and out. We would therefore strongly recommend that an objective opinion should be sought from a Theatre Consultant and that this is integrated within the policy text.
0202 MWA Planning and Development Consultancy	Object	CA19 - Blackfriars	BT objects to any part of the policy that would support the redevelopment of the Telephone Exchange building. Specific reference to the potential demolition is made at para. 8.85. BT will resist the loss of this site and the BT car park on operational grounds. Amend policy to reflect importance of the Telephone Exchange including BT's operational requirements.
0629 Robert Hitchins Limited	Support	CA19 - Greater Blackfriars	The long-term re-location of the prison is supported.
0941 British Waterways South West	Support	Policy CA.19 - Greater Blackfriars	British Waterways welcomes the inclusion of obligations in relation to pedestrian linkages to the Docks, downgrading of the Quay to vehicular traffic and contributions towards the creation of a riverside walk.
1444	Object	CA.19 - Greater	Third para. Add the words ", along with appropriate car parking provision." after " ... river frontage" to

Gloucestershire County Council		Blackfriars	be in accordance with the GHURC proposals for the redevelopment of Shire Hall. Also, under site-specific obligations (4th bullet), insert word "Possible" before "downgrading of the function of the Quay as a route for vehicular traffic".
1445 Gloucestershire County Council	Comment	Priority Area 2 - Greater Blackfriars	<p>The site encompasses nationally important archaeological remains, including part of the Roman town and its defences, the sites of the medieval castles, parts of the medieval town and the medieval Blackfriars priory, and the sites of early quays. Some areas are scheduled as ancient monuments but the significant archaeological remains are considerably more extensive than the scheduled areas.</p> <p>It is recommended that the archaeology of the site is described, strengthening the existing paragraph 8.94. In line with national and local planning policies there should be a presumption in favour of the preservation of nationally important archaeological remains.</p> <p>Archaeology should be included in the list of site-specific obligations, and reference should be made to the key factors in the planning process set out in paragraph two of this document above.</p>
1449 Gloucestershire County Council	Comment	Priority Area 2 - Greater Blackfriars	<p>The location, quantity and access for car parking in Policy CA19 'Greater Blackfriars' will require detailed consideration if the aspiration to downgrade the Quay and modify the Gyratory system is not to be prejudiced.</p> <p>Paragraph 8.91 of the 'Traffic and Transport' supporting text states that 'significant constraint on on-site car parking will be considered if it can be provided without causing harm to road safety, traffic management or amenity' rather than setting, or referring to, any average and maximum parking standards. This same comment could be levelled at all of the other Priority Areas and Section 9 'General Policies' does not contain a reference to parking standards.</p>
1450 Gloucestershire County Council	Support	Paragraph 8.96	<p>Support subject to clarification. The County Council is a major employer. The scale of accommodation required and the associated replacement costs are large. It is important not to underestimate the scale of the proposed scheme and the resources necessary to implement change. The timescale for reorganisation is not certain.</p> <p>Amend: "The redevelopment of the existing County Council offices including the Shire Hall building will depend on a number of key factors including the likelihood and timing of possible future Local Government restructuring and reorganisation, operational requirements, financial viability etc. These factors may not be confirmed for 3-5 years."</p>
1481 Royal British Legion – Gloucester City	Comment	CA.19 - Greater Blackfriars	It is a priority that the Gloucester City Branch of the Royal British Legion remains in the centre of the city and is easily accessible from all parts of the city. It is not acceptable to close the Branch whilst work is undertaken to provide alternative consultation as, once closed, it is very difficult to maintain membership and may not be possible to reopen. The Royal British Legion provides a great deal of welfare help, both financial and supportive to the ex-service personnel and their dependents within the

Branch			City that, should the branch be forced to close, would revert to the Council through departments such as Social Services which, it is understood, is already under pressure. We are quite prepared to move to suitable accommodation within the City Centre, provided that the property/properties are adapted to our requirements, of immediate vacant possession and are freehold. To this end, we would need Gloucester City Council to liaise with the developers to ensure that the 'lesser significant occupiers' are not sacrificed for profit.
1388 Brunswick Baptist Church	Comment	Policy CA.19 - Greater Blackfriars	Support a potential development in keeping with the historic area of Greater Blackfriars. Concern over access to the church and entry to the car park to the rear of the church. Sunday services attract in excess of 100 worshippers - 90 - 95% of which live outside of the City. The church is used by all age groups - from families with babies, through to the elderly who require ease of access from their transport. Our car park needs to be close for the above reason, and also for weddings, funerals, and other large functions. Parking to the front of the church is very restricted due to the immediate area being pedestrianised. Also concerns over health and safety/fire exit, and loss of income to the church funds due to car parking permits.
1426 City Centre Community Partnership	Comment	Greater Blackfriars	- General agreement with proposals - Considerable concern about what the impact of relocating the County Council would have on the local economy. Question was asked if a similar large organisation could be attracted into the area to maintain this aspect.
1533 Angela Tosh	Support	CA.19 - Greater Blackfriars	Support Blackfriars redevelopment - would be good for Gloucester. Concern regarding the number of extra cars that would be coming into the City and issues regarding a lack of parking.
<u>Policy CA.20 – Kings Square and the Bus Station (Priority Area 3)</u>			
<u>Paragraphs 8.98 – 8.139</u>			
0236 Mr M Aplin	Object	CA.20 - Kings Square/Bus Station	The actual policy statement does not sufficiently set out: How an improved bus station will be re-provided (this needs the space to be an improved interchange, and should be sites accordingly with respect to pedestrian movements from the train station).

			<p>How a cinema could be secured (is there any evidence that a modern operator would find it viable/possible to operate within a refurbished building_ It is unclear if the priority is to get a cinema centrally, which is crucial, or if the requirement is to retain the Debenhams building).</p> <p>How permeability between the train station area and King's Square would be guaranteed (given the footprint demands of a major retailer)</p> <p>How options for the Courts and Dunelm sites have been considered - what is the fallback_ (see earlier comments on office evidence base - this is important given the cyclical nature of the office market. Also there is the issue of developers wishing to over-extend the City retail core).</p>
0171 Bovis Homes Limited	Comment	Policy CA.20 - Kings Square/Bus Station	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0202 MWA Planning and Development Consultancy	Object	CA20 - King's Square and the Bus Station	<p>Redevelopment of this site is acknowledged to be bold and exciting. However its ability to deliver any significant improvement in retail and other floorspace within the foreseeable future is open to question. The area covered by the policy is large and there are a wide variety of issues to be resolved. Although it is asserted that a planning application could be submitted in the next 2 years, it is clear that any scheme involving a comprehensive redevelopment of the land will take many years to achieve. The plan should be more realistic in respect of likely timescales for delivery.</p>
1445 Gloucestershire County Council	Comment	Priority Area 3 - Kings Sq/Bus Station	<p>This site covers the northeastern part of the Roman town and its defences as well as part of the medieval town. Part of the site is a scheduled monument but the whole of the site should be regarded as of potential archaeological significance.</p> <p>There is at present no information on archaeology in this section of the Action Plan. It is recommended that the archaeological significance of the site is described and that, as for the other sites described above, archaeological requirements are included in the site-specific obligations and that the process of dealing with archaeology through the planning process is described as in paragraph two of these</p>

			comments above.
1449 Gloucestershire County Council	Object	Priority Area 3 - Clarence Street	We are concerned that the use of Clarence Street as a service road for the units with frontages on King's Square (Policy CA20) will at worst impede the continued use of the street as a major public transport terminus and at best undermine the intention to create a positive first impression for those entering the City by public transport from outlying areas.
1449 Gloucestershire County Council	Support	Priority Area 3 - Land Registry Car Park	Whilst supporting the proposal to provide a 2-way bus-only link between Bruton Way/Metz Way and Station Road (Paragraph 8.133 on 'Traffic and Transport' in the Section on Priority Area 2) we would suggest that placing this restriction on the junction with Bruton Way/Metz Way would undermine the convenience and benefits of the possibility of providing a multi-storey car park easily accessible from the ring-road (as identified as a problem to be overcome in paragraph 6.27) which will, "remain a major traffic route" (paragraph 8.114) if traffic accessing the site has to drive around Bruton Way, Station Road (north/south) and Station Road (east west). This would be particularly inappropriate if the new 'Bus Station' were to be located on or adjacent to Station Road (north/south). Our suggestion would be that vehicular access to the multi-storey car park is via Bruton Way/Metz Way with the 2-way bus-only link operating at the junction of the new road and Station Road (east/west).
1449 Gloucestershire County Council	Support	Priority Area 3 - Bus Station	We would support the intention of Strategic Objective 2 'To promote the sustainability of the transport system' at paragraph 6.20 and section 8 to deliver a, "modern new bus station" to improve attractiveness and improve interchange. However the term 'bus station' requires definition. Is this a 'Bus Station' or an 'On-Road Facility'. The Proposals Map, Part 2, identifies the whole of the Bus Station and Market Parade site and Clarence Street as part of the 'Bus Rail Interchange.' Paragraph 8.115 states that, "an alternative location within the area must be found" and Policy CA20 states that re-development of this area will include, "a replacement bus station with capacity for 12 buses". We believe that the bus station must remain 'within' the Inner Ring Road (to the south of Bruton Way) providing preferential access to the City Centre in comparison to car parks and avoiding the need to cross the IRR.
1377 Gloucester Hospitals NHS Foundation Trust	Comment	Policy CA.20 - Kings Square/Bus Station	<p>The Gloucestershire Hospitals NHS Foundation Trust is supportive of the efforts being made by the Council to develop the City and to promote sustainable development. The comments that are put forward in these representations are concerned with safeguarding the efficient functioning of the Gloucestershire Royal Hospital; maintaining accessibility for emergency and other hospital traffic, and ensuring that adequate parking for essential hospital needs is available. The trust would welcome the opportunity for continuing dialogue with the City Council to ensure that these objectives are met in the context of major developments in the surrounding area.</p> <p>The consequences of significant residential development in terms of demands placed on the wider Health Community will largely be felt by the providers of Primary Care. The new Primary Care Trust for Gloucestershire will also need to be kept informed of these proposals, be part of the dialogue with the City and included in assessments for infrastructure provision by developers.</p>

		<p>All proposals for the Railway Corridor, Kings Square _ the Bus Station and the former Kidzone Activity Centre, will affect traffic in the vicinity of the hospital, including access for emergency vehicles. It is vital that all proposals, both singly and cumulatively are carefully assessed to ensure that emergency access to the hospital is not impeded. Some proposed uses will increase traffic levels generally, whilst others (for example the Community Stadium) could concentrate traffic movement into specific times of the day. The operational activities of Gloucestershire Royal Hospital must not be jeopardised by access and traffic congestion. Gloucestershire Royal Hospital provides acute care for the County's population and its role and importance will increase over the coming years.</p> <p>Unimpeded access to the hospital site is required at all times. Emergency vehicle response times are critical. The ability of the patients and visitors to achieve ready access are also of key importance. The suggested possible closure of the level crossing to all vehicles would remove one of the routes to the hospital and should not be undertaken until without full consultation with the Trust and emergency services. Additional traffic light junctions should also be planned with emergency vehicles in mind.</p> <p>Consultation with the Gloucestershire Hospitals NHS Foundation Trust should take place at regular intervals to ensure that both policy and development proposals do not adversely affect the operation of and accessibility to the hospital.</p> <p>The obligation for development at the former Courts and Dunelm buildings and the Bus Station and Market Parade to make financial contributions towards upgrading the existing subway between Great Western Road and George Street is supported.</p> <p>Although the proposals for the redevelopment for the long stay car part at the Railway Station include a requirement for a financial contribution towards the improvement of the underpass, this scheme on rail land could represent the best opportunity to make real progress on securing major improvements to this key pedestrian route and this should be reflected in the scheme requirements.</p> <p>The substantial amount of development at Kings Square and the Bus Station is likely to increase the amount of visitors to the area. Despite this, the Central Area Action Plan does not state that additional car parking will need to be provided and proposes the loss of parking at the long stay car park at the railway station and potentially at the land registry car park. There is a concern that a lack of parking in the area may lead to visitors trying to use the hospital parking spaces. The CAAP needs to ensure that adequate car parking is provided or demand otherwise managed within the Kings Square and Bus Station area. The Trust would welcome involvement in discussions on this aspect of the Central Area proposals to ensure that the efficient functioning of the hospital is not compromised.</p>
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			<p>Paragraph 8.125 which states that it is the aspiration of the Council to remove or redevelop the whole of Bruton Way Multi-storey car park, and if this is not possible then the Council will require the remodelling of the facade. These options seem fundamentally different in terms of the parking provision of the area. The Trust's concerns as outlined above are similarly applicable.</p> <p>There should be an obligation to provide financial contributions to healthcare for any residential development in the Kings Square and Bus Station Area.</p>
<p>1353</p> <p>Morley Fund Management Limited</p>	Object	CA.20 - Kings Square/Bus Station	<p>We object to policy CA.20 as outlined in both the CAAP and SPD Planning Brief for Kings Square and the Bus Station.</p> <p>The policy is too prescriptive and provides an adverse level of detail which will compromise the deliverability of any future redevelopment scheme. We support the principle of this being developed in a comprehensive and inclusive manner to create a vibrant, viable and sustainable mixed-use city centre scheme. However, the level of detail contained within this document is unnecessarily restrictive and could adversely impact upon the financial viability of the redevelopment proposals. There is no clear evidence to justify the development parameters contained in the policy which prejudices the masterplanning process. The policy and the ensuing SPD should be drawn up in association with the key stakeholders and developers to ensure that the potential of the site is not jeopardised from the outset.</p> <p>The Council's aim of making the most efficient use of land (paragraph 3.17) and enhancing the vitality and viability of the city centre is compromised by the level of detail contained within this policy. The opportunities for a comprehensive redevelopment are limited from the outset. The Kings Square and Bus Station redevelopment scheme should be led by good design and sustainable development principles as well as a viable and deliverable mix of uses. These principles should be established through close liaison between the Council, key stakeholders, and developers to ensure that any scheme brought forward fits with market demand and is therefore achievable. The prescriptiveness of this document and policy CA.20 in general may lead to a significant delay in the redevelopment of this priority area.</p> <p>We object to the ' Bus Station and Market Parade' section of this policy for the following reasons:</p> <ul style="list-style-type: none"> - The allocation for major new retail development at this site should not be limited to comparison retail goods only. As part of the redevelopment it may be opportune to include an element of convenience retail floor area. PPS6 states that all new retail floor area including convenience should be located within the city centre. The current wording of the policy would exclude the ability to provide an

		<p>element of convenience floorspace in this area. We seek an amendment to this policy to ensure that, should an element of convenience floorspace be required, it is not excluded as an option within a sustainable mixed-use town centre site from the outset.</p> <p>- Reference to the mix of uses that are deemed appropriate for the scheme should be amended to state the following:</p> <p>'The Bus Station and Market Parade are allocated for major new comparison goods retail development that, where appropriate and as part of a mixed-use scheme, may also include residential, leisure, offices, convenience retail and a replacement bus facility'.</p> <p>The policy should allow for flexibility within the type of uses to be provided as part of the redevelopment scheme to allow for any changes in the market. Whilst we are aware of the requirement for a relocated bus station we object to the wording. The phrase 'replacement bus station' implies a like-for-like replacement, however it may be appropriate to provide a replacement bus facility in a different format linked to the adjacent railway station. Therefore we seek an amendment to the wording to allow for a replacement bus FACILITY.</p> <p>- The 'Indicative Capacity/Floorspace' stated is too prescriptive and does not provide for a degree of flexibility for the uses or floor areas proposed to allow for changing market conditions.</p> <p>- A definition of 'indicative' should be incorporated into the policy to ensure that the uses stated are subject to alteration rather than appearing absolute.</p> <p>- With regard to the floor areas stated within the Indicative Capacity /Floorspace section of the policy, we seek to ensure that the floor areas stated are not established as upper thresholds. The floor areas proposed in any future redevelopment scheme will need to be balanced against retailer requirements, the market and development costs. We also seek clarification on the background research that has been undertaken by the Council from which the Indicative Capacity and Floor Space schedule has been drawn up. The floor areas stated in the policy do not provide any flexibility and therefore could compromise the viability and deliverability of any future development scheme.</p> <p>- The floor area that is finally developed as part of the Kings Square and Bus Station redevelopment scheme should reflect the capacity that is considered appropriate based on an economic assessment of the area.</p> <p>- The 'Site Specific Obligations' for the Bus Station and Market Parade are too prescriptive in nature.</p>
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		<p>They have not been adequately justified and predetermine the precise form and nature of the development. We seek an amendment to the title of this section to 'Site Specific Consideration'.</p> <p>- We seek an amendment to bullet point 1 of the 'Site Specific Obligations'. The wording should be altered to allow for the possible redevelopment and/or reorganisation of the Bruton Way Car Park in its entirety in addition to the remodelling or removal of the facade.</p> <p>We object to the content of the 'Kings Square' section of policy CA.20 on the following grounds:</p> <p>We wish to see the removal of the following sentences within this section; 'Proposals to convert Debenhams into smaller retail units with a cinema above will be supported in principle subject to the provision of a new department store in the new retail scheme on the existing bus station'.</p> <p>The redevelopment of the scheme should be viewed in its entirety and the requirement to 'anchor' certain elements within the scheme in exact locations should not be contained within this policy. The key stakeholders and developers will need to assess the viability and deliverability of all aspects of any future redevelopment scheme. The 'obligation' that this element of the policy places on any future redevelopment scheme(s) may render them undeliverable and could jeopardise the viability of any such project.</p> <p>- We object to the exacting nature of the second paragraph of the King's Square section. We seek the following amendment;</p> <p>'Kings Walk on the south-east side of Kings Square could be redeveloped with retail units provided as part of a mixed-use scheme including residential. Any new buildings should, where possible, be positioned to enhance views along station road to the cathedral. The existing roof top car park could be replaced and the reorganising of servicing arrangements may be necessary as part of the redevelopment scheme'.</p> <p>We object to the detail contained within the 'Land Registry' section of the policy.</p> <p>- We seek an amendment to the policy as stated below:</p> <p>'The Land Registry car park may be needed for multi-storey car parking as part of the comprehensive development of the area. An appropriate alternative mixed-use development as well as car parking may be considered acceptable.</p>
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			<p>- We object to the indicative capacity of 300 parking spaces being stated within the policy. The quantum of car parking required should be based on the overall requirement for replacement and new car parking provision with the King's Square and Bus Station redevelopment and will be dependent upon the final development proposal.</p> <p>We object to the allocation of the former Courts and Dunelm buildings for B1 office development.</p> <p>This precludes any alternative appropriate uses that may be included as part of a comprehensive redevelopment of the area. As this site falls within the designated city centre due consideration should be given to all appropriate alternative uses. To ensure that a viable, comprehensive and deliverable redevelopment scheme is brought forward the exacting nature of the policy should be removed. We seek an amendment to the policy to state the following:</p> <p>'The former Courts and Dunelm buildings could be developed for a wide-range of City Centre uses as part of the comprehensive redevelopment of the area'.</p>
<p>1426</p> <p>City Centre Community Partnership</p>	Comment	Kings Square & Bus Station	<p>- The proposed provision of spaces for 12 buses appears like a downgrade of facilities which is not appealing. Questions have been raised about if the bus station will retain capacity to cater for the numbers using the existing facilities. Mention was made that a possible use of bus "drop off" points at Westgate st. and the Quays but no mention could be found of this.</p> <p>- The provision of dwellings around Kings Square does not appear to be complimentary to the use of the Square for entertainment i.e. noise issues for residents.</p> <p>- Toilet facilities need to be catered for in the area and there was a general feeling that consideration needs to be given to ensuring that these maintain a good appearance.</p> <p>- Possible provision for skateboarders and young children within the area i.e. small skateboarders area where they can do skate whilst maintaining safety clearance from other pedestrians and event can be considered an entertainment factor for visitors to the city.</p>
<p>1444</p> <p>Gloucestershire County Council</p>	Comment	Paragraph 8.115	It should be made clear that the bus station should be located within the Ring Road (Bruton Way).
<p>1484</p> <p>Captain M Glover</p>	Object	CA.20 - Kings Square/Bus Station	<p>The bus station badly needs replacing, but these ideas are unworthy of the site.</p> <p>The idea of linking the railway station is a good one in principal but isn't adequately reflected in the proposals.</p>

			<p>The current long-term station car park needs to be retained to encourage rail travel (central government policy) - assuming that the station itself has got a future.</p> <p>Access to platform 4 requires the installation of a passenger lift.</p> <p>The main thoroughfare of Bruton Way is an obstacle to the construction of an integrated site. An alternative would be to take the road along the route of the old Station Road (demolishing the buildings on the corner of Northgate Street and Bruton Way) and emerging at the Metz Way junction. A new bus station, perhaps using much the same layout as the one at Bath, could then occupy the cleared land, i.e. both railway and bus stations would be side by side with easy access to both.</p> <p>In other words, the proposals for this site are not adventurous enough and will lead to a mish-mash that requires more attention within a few years.</p> <p>More activity is required in Kings Square.</p>
1584 The Occupier	Object	CA20 - King's Square and Bus Station	The obvious outcome is to make a car park out of the bus station and bring the bus station back to the King's Square.
1586 The Occupier	Object	CA20 - King's Square and Bus Station	Support development proposals but more needs to be done to enforce the area in terms of wardens and policemen to avoid problems of skateboarders and people on bicycles etc.
1502 Morley Pooled Pensions Limited	Object	CA.20 - Kings Square/Bus Station	<p>We object to policy CA.20 and paragraphs 8.103 - 8.139 for Kings Square and the Bus Station.</p> <p>Policy CA.20 and the supporting text is too prescriptive and provides an adverse level of detail which will compromise the deliverability of any future redevelopment scheme. We support the principle of this site being development in a comprehensive and inclusive manner to create a vibrant, viable and sustainable mixed-use city centre scheme. However, the level of detail contained within this document is unnecessarily restrictive and could adversely impact upon the financial viability of the redevelopment proposals. There is no clear evidence to justify the development parameters contained in the policy which prejudices the detailed masterplanning process. This policy and the ensuing SPD should be drawn up in association with the key stakeholders and developers to ensure that the potential of the site is not jeopardised from the outset.</p> <p>The Council's aim of making the most efficient use of land (paragraph 3.17) and enhancing the vitality and viability of the city centre is compromised by the level of detail contained in this policy. The</p>

			<p>opportunities for a comprehensive redevelopment are limited from the outset. The redevelopment scheme should be led by good design and sustainable development principles as well as a viable and deliverable mix of uses. These principles should be established through close liaison between the Council, key stakeholders and developers to ensure that any scheme brought forward fits with market demand and is therefore achievable. The prescriptiveness of this document and policy CA.20 in general may lead to a significant delay in the redevelopment of this priority area.</p> <p>We object to the allocation of the 'Former Courts and Dunelm buildings' for B1 office development.</p> <p>This aspect of the policy precludes any alternative appropriate uses that may be included as part of a comprehensive redevelopment of the area. As this site falls within the designated city centre due consideration should be given to all appropriate alternative uses. To ensure that a viable, comprehensive and deliverable redevelopment scheme is brought forward the exacting nature of the policy should be removed. We seek an amendment to the policy to state the following:</p> <p>'The former Courts and Dunelm buildings could be redeveloped for a wide range of city centre uses as part of the comprehensive redevelopment of the area'.</p>
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Policy CA.21 – The Docks (Priority Area 4)

Paragraphs 8.140 – 8.175

0171	Comment	Policy CA.21 - The Docks	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
Bovis Homes Limited			
0941	Object	Policy CA.21 - The Docks	<p>British Waterways is satisfied with proposals for Southgate Moorings.</p>

British Waterways South West			In terms of land at the Dry Docks, British Waterways is proposing to undertake a Masterplanning exercise. A mixed-use development is likely to be proposed and we believe that the indicative should be 100 dwellings and that provision should be made for the possibility of a hotel on this site. British Waterways therefore objects to the current wording of this policy.
0941 British Waterways South West	Comment	Paragraph 8.152	The option of a new bridge across the Docks needs careful consideration. It is likely that this will be the subject of a feasibility study that will address the design of a bridge and address impact of a bridge in relation to navigation.
0941 British Waterways South West	Comment	Paragraph 8.156	It is unclear how a multi-storey car park can 'reflect the style of the warehouses in the Docks'. British Waterways would prefer to see a contemporary design which allows views out towards the Docks, but not necessarily with viewing platforms. Further clarity is needed here as to what is likely to be acceptable.
0941 British Waterways South West	Comment	Paragraph 8.159	British Waterways supports the proposals for a slender landmark building at Llanthony Bridge. It is unclear as to which views of the cathedral need to be safeguarded. Many of the existing views in this area have already been blocked by the new Gloscat development. Further clarity is requested in this section.
0941 British Waterways South West	Comment	Paragraphs 8.166 – 8.168	These paragraphs are unclear. It is suggested that the development will increase traffic in the area, but Severn Road can be reduced in width. Paragraph 8.168 presumably relates to vehicular access to West Quay rather than Severn Road, but this is not clear. The main access point is currently adjacent to Llanthony Bridge. Further clarification is required.
0941 British Waterways South West	Comment	Paragraph 8.175	In view of the fact that the new multi-storey car park at West Quay will be taking the visitor parking from Southgate Moorings, British Waterways considers that a contribution to the cost of a new car park should be provided through a S106 agreement. The Outputs list for the Dry Docks should refer to 100 homes.
0941	Support	Southgate Moorings and	British Waterways welcomes the inclusion of Southgate Moorings and the area around the Dry Docks (West Quay) as key sites for development within the Docks.

British Waterways South West		Dry Docks	
1445 Gloucestershire County Council	Comment	Priority Area 4 - The Docks	This area has archaeological potential but little information is included in the Action Plan concerning the potential nature of the archaeological remains nor the processes for dealing with them. Accordingly, it is recommended that appropriate information is added.
1433 Carol Wheeler	Comment	CA.21 - The Docks	Buildings on Southgate Moorings should not be taller than the Victorian Warehouses or the buildings currently lining the edge of the Dock area/Southgate Street. There should be views through the buildings to the water and boats. Support offices on Southgate Moorings though concern that these might not be filled. Support ground floor commercial premises - a small foodstore e.g. a Tesco Metro would be good. Concerned about pubs and nightclubs as they can be noisy and there are already some pubs within the Docks area. The Dry Dock should remain a working boatyard as a tourist attraction.
1374 Mapeley Estates Limited	Support	Policy CA.21 - The Docks	Mapeley Estates Limited support this policy.

Policy CA.22 – Westgate Island and Quay (Priority Area 5)

Paragraphs 8.176 – 8.208

0171 Bovis Homes Limited	Comment	Policy CA.22 - Westgate Island/Quay	Standard paragraph for policies CA.18 - CA.32. The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.
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			<p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0298 Mr & Mrs D Daw	Object	CA22 - Westgate Island and Quay	<p>Totally opposed to a multi-storey car park on the Quay site as it would be out of proportion and not sympathetic to the river location and to any future housing and certainly not to the Almshouses. It would spoil any ideas to enhance the riverside and would be a blot on the landscape.</p> <p>Support the proposed riverside footpath which will help to enhance the area. A footpath next to a multi-storey car park will only encourage anti-social elements.</p> <p>It would seem sensible to incorporate improvements to the boating lake especially in view of the footpath extension. If developed, the boating lake could be a greater amenity to this large residential area, to Alney Island residents and to new residents at St. Oswald's Park.</p>
0445 Environment Agency	Object	Priority Area 5 - Westgate Island/Quay	<p>This site is located within Flood Zones 2 and 3. Site specific obligations for development should include contributions to flood defences.</p>
0941 British Waterways South West	Support	Policy CA.22 - Westgate Island & Quay	<p>British Waterways welcomes the commitment in this policy to making contributions to a new bridge across the River Severn and a new riverside walkway along Westgate Quay.</p>
0942 English Nature	Support	Policy CA.22 - Westgate Island/Quay	<p>Note that an attempt has been made to ensure that local residents have access to a greenspace under this policy. This suggests the construction of a pedestrian bridge to open spaces at Castlemeads and Alney Island. While English Nature is keen to support the Council in this action, we wish to flag up the importance in creating new greenspaces rather than increasing the pressure on existing greenspaces. As acknowledged in your CAAP and the POS Strategy, Gloucester is currently short of open space and this probably applies to greenspaces as well. The emphasis of the plan should therefore be on the provision of new greenspaces.</p>
1359	Support	CA.22/Priority Area 5 -	<p>We act on behalf of Countrywide Farmers which operates a Countrywide Store at The Quay in Gloucester. This store is a relatively modern development and functions as one in a series of similar</p>

<p>Countrywide Farmers</p>		<p>Westgate Island</p>	<p>outlets within the Countrywide Stores chain.</p> <p>It is noted that the Central Area Action Plan includes proposals for Priority Area 5 - Westgate Island and The Quay which includes our client's store and the following comments are made in response to the Council's proposals.</p> <p>Policy CA22 proposes to allocate Westgate Quay for mixed use development, including residential, B1 uses and limited ancillary commercial development. The nearby Westgate Island site is also promoted for mixed use development of residential, limited comparison goods retailing, leisure and employment uses.</p> <p>Our client is concerned that the expectations for redevelopment at Westgate Quay ignore the fact that there is already on site a significant retail outlet in the form of the Countrywide store. Our client does not question the principle of the potential of a mixed use redevelopment of the Quay area but feels that the lack of recognition that the retail use can and should be replaced is likely to put at risk the Council's policy aspirations for the site. The Countrywide store is a significant investment for our client and this is its core business. The store is popular, commercially successful and serves a local clientele with goods which they cannot easily access elsewhere in the immediate area. It, therefore, represents a local facility of value to the local community.</p> <p>For these reasons, our client objects to the limited range of uses expected within the mixed use redevelopment of Westgate Quay under Policy CA22. On their behalf, we request that the Policy be reworded to include retail alongside the already suggested mix of residential and commercial floorspace.</p> <p>Our client notes the Council's aspirations for the future upgrading of the site and improvements to local infrastructure but does not feel that these would be compromised by a mixed use scheme which reincorporated a Countrywide Store.</p> <p>We would also highlight the fact that, as agricultural based retailing is our client's core business, the release of its store at The Quay would be likely to be a difficult decision if a replacement was not available on site. Thereby, this would be likely to represent a major hurdle to the Council's aspirations for the redevelopment of the land. A more flexible policy which makes reference to also including retail would display greater prospects of success.</p> <p>1.8 Paragraphs 8.197 and 8.198 deal with Traffic and Transport at Westgate Quay. Paragraph 8.197 deals with the matter of vehicular access into the Quay site and advises that the existing access</p>
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			<p>from The Quay could be utilised but that access from Westgate Street will need to be simplified with only one means of access and egress. This proposal does not match that within the Draft Planning Brief for the area (Paragraph 4.17). The Planning Brief does not assume that access from Westgate Street will be simplified but, rather, states that access would be provided from the existing points on Westgate Street and The Quay. Any discrepancies should be clarified but, any suggestions that existing access arrangements will be modified, should not be such as to compromise the ongoing viable operation and presence of the Countrywide store.</p> <p>1.9 The Draft Central Area Action Plan refers to "anticipated time frame/delivery" at Paragraphs 8.206 to 8.208. In this it is explained that Westgate Quay is anticipated to become available within the next two to three years but that this is, of course, subject to the relocation of the existing site occupiers. On behalf of Countrywide Stores it is helpful to note that the City Council proposes to work with the landowners in order to ensure that existing occupiers are able to relocate within the City should any redevelopment of the site be brought forward. Whilst there are, obviously, a range of uses within Westgate Quay who may need relocation, the Countrywide Store may be that which raises the most particular planning policy considerations. It is proposed, therefore, that the Council's parallel planning policies which deal with retail development make specific provision for the re-accommodation of the Countrywide Store by allowing flexibility for it to be re-housed at an appropriate location in the City and without having to satisfy the full PPS6 tests. If the City Council feels that there is such material gain in the Westgate Quay site coming forward for a mixed use redevelopment which does not include a replacement of the Countrywide Store, it would be a natural consequence that some flexibility in its retail policies should be provided in order to facilitate the redevelopment aspirations.</p>
1445 Gloucestershire County Council	Comment	Priority Area 5 - Westgate Island/Quay	This area has archaeological potential but little information is included in the Action Plan concerning the potential nature of the archaeological remains nor the processes for dealing with them. Accordingly, it is recommended that appropriate information is added.
1449 Gloucestershire County Council	Comment	Priority Area 5 - Westgate Carr Park	The retention of, and access arrangements to, Westgate Car Park must be compatible with the highway aspirations, for the Quay in particular.
1449 Gloucestershire County Council	Comment	Priority Area 5 - Gyrotory Road System	It is imperative that a highway scheme is designed and approved by the Highway Authority before any development proposal is approved (Paragraph 8.185).

<p>1459</p> <p>Mr J Donn</p>	<p>Support</p>	<p>CA.22 - Westgate Island and Quay</p>	<p>I am generally in favour of the proposals.</p> <p>When the south-west bypass and the inner ring bridge over the canal have been completed, the Westgate Gyratory system should be replaced with a t-junction at St Oswald's Road.</p> <p>Lower Westgate, adjacent to the Almshouses, should be part pedestrianised, in much the same way as the road outside Shire Hall. The park and ride bus should be re-routed through this area, to stop at the proposed pedestrian bridge over the river to Castlemeads.</p> <p>Castlemeads should have car park, and the whole area should be kept cut, so that the riverside area can be used, as in towns such as Ross-on-Wye and Evesham.</p> <p>Finally, it would seem that the proposed redevelopment will provide a great opportunity to improve the flood defenses of lower Westgate and the whole of the Quay area.</p>
<p>1468</p> <p>G A Jones</p>	<p>Object</p>	<p>CA.22 - Westgate Island and Quay</p>	<p>Object to more shops and offices in this area.</p>
<p>1426</p> <p>City Centre Community Partnership</p>	<p>Comment</p>	<p>Westgate Island and Quay</p>	<ul style="list-style-type: none"> - All in agreement with retention of Westgate House. - Land between Country store and Westgate Garage - Concern over height and visual image of buildings and impact on views. Also concern about loss of convenience store (garage). - General agreement over "downgrading" of road into quay. - The pedestrian bridge over river - residence need to be convinced as to the need for this bridge. - All in agreement to riverside walk (between quay and Westgate bridge). - General agreement to traffic proposals. - Item 4.27 indicates a multi-storey car park off the quay, there was concern over the visual impact of this proposal. - There was an expression of concern over the lack of transport links for elderly from lower Westgate St. to the City centre.
<p>1484</p> <p>Captain M Glover</p>	<p>Object</p>	<p>CA.22 - Westgate Island and Quay</p>	<p>This is a key site which deserves more sensitive attention than the current proposals provide.</p> <ul style="list-style-type: none"> - Some reference to the historic nature of the site should appear, perhaps in the way that has been done with the paving in Westgate Street to which it relates - The almshouses needs to be repaired and given a central focus which acknowledges its status - Consideration should be given to making the site an integral part of the Westgate area i.e. abolishing its island nature

1515 Mr Len Carey	Object	CA22 - Westgate Island and Quay	- A reconsideration of the materials to be used harmonise the quayside and the prison. Support proposed replacement of gyratory system. The extension of the riverside walk with a modern approach to landscaping is also to be welcomed. The proposed mixed-use development on Westgate Quay will need to be sensitive to adjoining areas. Object to provision of multi-storey car parking as this would be contrary to policies designed to discourage use of the private car and promote public transport. A multi-storey car park may also obscure important views e.g. the view of the Cathedral from the west. It may also blight the outlook of properties in the area of lower Westgate.
1525 Mr John Hostler	Object	CA.22 - Westgate Island and Quay	Object to the provision of a multi-storey car park on the site of the Countrywide Stores building. Pedestrian link to the boating lake should be provided.
1543 Mr Phillip Taylor	Comment	CA22 - Westgate Island and Quay	Any redevelopment of the gyratory system will need to consider the access to the Riverside Gym and the pitch and putt area. The pitch and putt area could be included within the redevelopment area to provide better facilities.

Policy CA.23 – Railway Corridor (Priority Area 6)

Paragraphs 8.209 – 8.246

0171 Bovis Homes Limited	Comment	Policy CA.23 - Railway Corridor	Standard paragraph for policies CA.18 - CA.32. The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated. Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing. We would like to withhold further comment on these individual sites.
0772 Network Rail	Comment	The Railway Corridor	The CAAP and the Planning Brief need to have regard to the potential of the existing site to contribute towards these improvements and still remain a viable development opportunity. The creation of a linear park could take up to one hectare off the total 4.3 hectares of the site - thereby limiting its potential and viability for development. A solely residential development would also provide good

			<p>planning outcomes including; better connections to the station and through the site. The linear park specifications set out in the Planning Brief para 4.66 are too specific and restrictive. The broad objectives for pedestrian permeability and access can be achieved in alternative ways. The development of the site should not preclude the provision of an improved bridge connection i.e. by ensuring that land will be available for it, and may even make some contribution towards this based on the likely level of site generated use the connection will attract (the balance of which should be sought from development in the wider area).</p> <p>Changes sought:</p> <p>Delete mixed use development from the list of site-specific obligations in Policy CA23.</p> <p>Delete creation of a linear park with a new/improved bridge connecting to the railway station from the list of planning obligations.</p> <p>Consequential amendments are required to paragraphs 3.43 through to 3.46 of the Planning Brief and to paragraph 4.7 which sets out the broad design principles. While an east-west connection and permeability through the site are desirable, these should be set out in the key design principles only. The contribution of the land and the development of a park, some 30 metres wide and some 300+metres long is unreasonable to apply to this one site, when it is potentially of wider community benefit. The site could support a more modest east-west link, in accordance with design objectives for safety, connection, lighting and access, but the scope of the contribution as stated in the brief is unreasonable.</p>
0772 Network Rail	Object	The Railway Corridor	<p>Detail of objection:</p> <p>This site provides a very good opportunity to redevelop brown field land, and this is in complete accord with PPG (Para6) where the provision of new housing on previously developed land is a priority. It is critical that the Council make the most sustainable and efficient use of space in Gloucester by encouraging intensification and growth in areas near transport links and services. The Council acknowledges that the rates of home ownership in the central area are lower than average, with an increasing need for smaller dwellings . The development of the Great Western site for housing, with a proportion for affordable housing will go partly to addressing this need.</p> <p>The Policy provides for mixed B1 and residential development of the site. The site is acknowledged as being very accessible in the Planning Brief Sustainability appraisal and is, as we have previously submitted, suitable for a range of uses including residential. The indicative capacities for residential are considered too low as PPG3: Housing, paragraph 58, suggests that 30-50 units net per hectare is</p>

		<p>an efficient use of land. We have reservations about the likelihood that 10,000m² of B1 office and/or light industrial is desirable or achievable on this site. We also consider that any change to accommodate more B1 activity on the site would be unreasonable if other proposals in the Corridor do not provide for employment related activities.</p> <p>The site is potentially required to support a range of improvements, including changes and alterations to land in other parts of the Railway Corridor. To do this, it is essential that the site's residential or mixed use potential is maximised.</p> <p>While the Council has had marked success with the redevelopment of the docks and the town centre has its historic heart from which to launch its regeneration, the Railway Corridor has rather less amenity, and arguably, significant constraints within which to achieve regeneration. In this situation, the Council should be ensuring that development options are flexible and the level of contributions are reasonable, to encourage development in this location as opposed to other, more readily available options in the locality.</p> <p>Changes requested:</p> <p>That the Policy be amended as follows:</p> <p>Great Western Road Sidings</p> <p>"Mixed use B1 employment and/or residential development"</p> <p>Delete the indicative capacities of 150 dwellings and 10,000 sq. m B1 office and/or light industrial.</p> <p>Consequential amendments are also required to paragraph 3.21 of the Planning Brief to widen the range of potential site uses.</p> <p>Consequential amendments are also required to paragraph 3.24 of the Planning Brief where it states that if a stadium use came forward on the (Northern) Triangle site, the ratio of employment to housing uses on the Great Western sidings site would need to be reassessed. We consider that irrespective of the fate of the (Northern) Triangle site, residential development is required on the Great Western sidings site, at a minimum at the level indicated in the AAP, and preferably at higher levels to fund the site's remediation and any contributions that will be applied.</p> <p>Consequential amendments are also required to paragraph 3.48 which should be amended to reflect</p>
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<p>0772</p> <p>Network Rail</p>	<p>Object</p>	<p>The Railway Corridor</p>	<p>PPG3: Housing, paragraph 58, with the density set at 30-50 units per hectare.</p> <p>Representation to:</p> <ul style="list-style-type: none"> - Pedestrian footbridge link to Horton sidings - Provision of new access off Metz Way - Upgrading of Blinkhorn's Bridge for pedestrian/cycle and emergency vehicle access <p>The inclusion of the above three improvements as planning obligations is also unreasonable, as the need for each is contingent upon the nature and level of development on the site. Paragraph 3.35 of the Planning Brief justifies the link to the Horton Road sidings on the basis that it is "integral to the success of the stadium". As a stadium use on the site is not (as yet) justified or demonstrated to be feasible, the inclusion of an obligation to provide the Horton Road access to the site is not justified in terms of PPS 12 and the AAP cannot include a requirement for a contribution to be made in terms of Section 106. If the site is redeveloped for any other activity, this link may not be needed as access opportunities exit at Metz Way and via Blinkhorn's Road Bridge.</p> <p>Changes sought:</p> <p>The Policy should be recast to preface these items with the phrase;</p> <p>" In assessing whether contributions will be applied for some or all of the following items, the Council will have regard to the nature and scale of the proposal and whether the access improvements relate to the intended use of the site." - or similar wording</p> <p>Consequential changes are also required to the Planning Brief para 3.47 where it describes the outputs required on the basis that a community stadium will be developed. This paragraph should be changed to reflect differing levels of contributions that may be required for the employment related developments that do not include the stadium but are provided for in the Policy, and for flexibility in the range of objectives linked to the contributions in the Policy CA 23.</p> <p>Consequential changes are required to paragraph 3.30 of the Planning Brief to delete the reference to the potential high speed bus link on the basis that there is no evidence that this is required. The case for any contribution of land towards the bus way is dependant on the degree to which the site will generate a need for such a facility. If the site's use does not warrant such a facility (and it is difficult to anticipate that it would in terms of some of the permitted employment-related activities) then no such contribution should be provided.</p>
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			Consequential amendments are required to paragraph 4.7: Key Design Principles to accommodate a scenario where the nature of the use of the site does not lend itself to providing a landmark building with high quality public realm. If the site is used for B2 and B8 employment uses there is little reason to provide extensive public realm areas as there would be no real need for access in and around the site.
0772 Network Rail	The Railway Corridor	Object	<p>Like the landmark building aspiration, the high speed bus link represents another significant contribution for which, at this stage there is no specific justification. The Local Transport Plan broadly seeks improvements to bus facilities and services but there is nothing in the LTP justifying this link, nor is it funded. To our knowledge no feasibility is available for this link and in the absence of funding or programming, the inclusion of this obligation is unjustified and potentially blights the site's development for any use.</p> <p>The link is mentioned in para 3.33 as an option for providing alternative access for stadium passengers, but if the site were to be developed for example for warehouse use, such a link would not necessarily be related to the site's development and therefore the provision of land for it would be unreasonably applied as an obligation. Given the range of options provided in the existing Policy CA23, the inclusion of this aspiration as a planning obligation is unreasonable. The lack of any specifics about the design (i.e. area and location) of the bus way limits the sites viability for any form of development and is illustrative of the impact that the inclusion of the Community Stadium in the Policy potentially has on the future development of the site for employment-related activities. As the link is unfunded and the stadium is required to rely upon public transport (as little parking would be provided for match-goers) there is no guarantee that the site is suitable, available and accessible in terms of para 2.15 of PPS 12.</p>
0772 Network Rail	The Railway Corridor	Object	It is not usual for the development of a landmark building to be required by obligation; rather, they are generally encouraged through providing a permissive environment in which such a building (or buildings) could be developed. It is unlikely that the B class uses could provide such a building unless the site is developed for office use. A sizeable residential development could also potentially achieve this. A community stadium development could also achieve this objective, but for the foregoing reasons it is considered that the impact of the obligations clauses in the Policy need assessing against the other viable potential site development options. Given the level of contributions required, the funds available for a high quality development will also be restricted for any developer.
0772 Network Rail	The Railway Corridor	Object	The site specific obligations for the Railway Triangle (Northern) site require modification to ensure that they reflect a realistic approach to the site's redevelopment.
0772	The Railway Corridor	Object	The preferred option ignores previous comments made by both Network Rail and by LXB in regard to the suitability of a residential development on the site. (see previous comments attached). As stated

<p>Network Rail</p>		<p>in our previous comments; the size of the site is sufficiently large that a properly considered and master planned approach could provide an attractive residential environment with pedestrian and cycle links via Blinkhorn Bridge to the surrounding residential area to the East and excellent vehicular and public transport links to the railway station, bus station and city centre.</p> <p>The Sustainability Appraisal for Objection Sites gives the reasons for not allocating the (Northern) Triangle site for residential development as "the site's suitability for this is mixed as it is relatively inaccessible by non-car modes and does not relate well to other residential communities" . However, there is no reason why the site's accessibility could not be improved - at a scale which would ensure good connections were provided a level appropriate for residential development. It is disappointing to see that there is no provision for residential development in the Preferred Option when this would also achieve many of the objectives set out in the AAP and Planning Brief. At a minimum we would like to see residential/mixed use development provided for on the site because that is the likely development which might achieve the objectives and therefore the wider regeneration benefits from the site's development. The Sustainability Appraisal (paras 4.99-4.103) does not appear to have considered an option which would provide for mixed residential-employment use (as suggested by the parties with an interest in the site at the Issues and Options stage) and is therefore deficient in this regard.</p> <p>The site has been available for development of solely B class employment-related uses for some time and there has been some difficulty generating interest in this form of development. We would not wish to preclude the development of these types of uses on the site going forward - however, it has been clear that to date there has been little interest in this.</p> <p>Network Rail has several objections about the inclusion of the Community Stadium option in the Policy (and in the commentary of both the AAP and the Planning Brief) for the following reasons:</p> <ol style="list-style-type: none"> 1. There is no documentation available supporting the feasibility of a stadium option on this site, but it is understood that such a study is underway. At this stage the option for a stadium on the site does not meet the tests of suitability, accessibility and availability as set out under paragraph 2.15 of PPS: 12 Local Development Frameworks. This information would be material to any consideration of allocating land not under the control of the Club for such a use and should not be progressed as an option until the feasibility study has been completed, and there is consensus between all the parties to use the site for this purpose. 2. PPS 12 also requires that the Preferred Options stage must present options of "sufficient detail for the type of development document envisaged, to enable meaningful community involvement and the sustainability appraisal". The implications of the community stadium option are not clear for
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		<p>this stage of the AAP and in turn, it is premature to develop a Planning Brief without such a study. PPS 12 requires that the options should be presented clearly - in our view this is not the case as the real implications of the activity, and hence the design parameters for its development, are very broad at this stage.</p> <p>3. The Action Area Plan Policies and the Planning Brief should have been delayed until such a time that a feasibility study on the stadium was completed, as it has a two-fold effect on the future of the Railway Corridor. Firstly it has, to a degree, limited the options available for development on the (Northern) Triangle site with the expectation that it will deliver on the range of objectives set out in CA23. For example, while it might be easier for a stadium to deliver on the prominent or iconic building objective, it is clearly difficult for some of the other Preferred Option B1,B2 and B8 uses (although not impossible) to achieve the same visibility, if for example the site is used for storage uses. This uncertainty also inconsistent with PPS: 12 Local Development Frameworks as there is not one, but two 'preferred options' for the site - one of which currently has no proven feasibility and which potentially has a blight effect on the other.</p> <p>4. Secondly, the options for residential development within the Railway Corridor are affected to some degree by the allocation of the rugby club site for residential allocation. Given the suitability of the site for a stadium use is moot; it is imprudent to include both the housing allocation on the rugby club site and the stadium in the Preferred Option for the ((Northern)) Railway Triangle site. The development of the Action Area Plan and more particularly, the Planning Brief should have been delayed until the outcomes of a feasibility study are known.</p> <p>Network Rail therefore supports and objects to the Preferred Option in Policy CA23 to the extent that it provides for employment relates B1, B2 and B8 uses and for a mix of uses, however it is considered that reference to the community stadium is unreasonable at this time, and that the range of uses should be widened to stimulate regeneration and redevelopment.</p> <p>Changes sought:</p> <p>The Policy should be amended to read:</p> <p>"The Railway Triangle (Northern Side)</p> <p>B1,B2 or B8 employment use or a mix of uses or residential development including mixed uses."</p> <p>Consequential changes are also required to the Planning Brief paragraph 3.19 and 3.20 and para 3.47</p>
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			<p>where the latter describes the outputs required on the basis that a community stadium will be developed. This paragraph should be changed to reflect differing levels of contributions that may be required for developments that do not include the stadium (and which are provided for in the overarching policy) and for flexibility in the range of objectives linked to the contributions in the Policy CA 23.</p> <p>Consequential changes are also required to the Planning Brief, particularly paragraphs 3.31 through to 3.35 on the basis that there is no justification for providing for the stadium at this stage and that the site is not clearly available for that use at this time. Similarly, paragraphs 4.16 and 4.18 should also be deleted.</p>
<p>0772 Network Rail</p>	<p>Paragraph 8.220</p>	<p>Object</p>	<p>The Central Area Action Plan encourages the comprehensive re development of the Railway Corridor, with an emphasis on the Triangle site (north) as having the potential to kick-start the redevelopment process. The availability of the sites within the corridor varies and it is unlikely that they will all be available for redevelopment at the same time. In paragraph 8.220 it appears that the Council's desire to see a comprehensive development is predicated upon Network Rail's rearrangement of its activities in the Corridor. While this is true to some extent it may be possible to rearrange activities to bring some areas forward more quickly than others. For example, the northern part of the railway Triangle site is able to come forward in the near future. There should be provision in the AAP and the Planning Brief for proposals to come forward on the (Northern) Triangle site earlier, in order to achieve early progress towards regeneration of the area.</p> <p>Changes sought:</p> <p>Change paragraph 8.220 AAP to reflect the potential for parts of the corridor to be developed independently of other sites by changing the first sentence to read:</p> <p>"The comprehensive framework for the development of the Railway Corridor will be provided via the Planning Brief. Sites may come forward either jointly or separately and will be assessed in terms of the Planning Brief" - or similar wording.</p>
<p>0772 Network Rail</p>	<p>The Railway Corridor – Community Stadium</p>	<p>Object</p>	<p>The documents identify that the Railway Corridor lands represent a significant brown field redevelopment opportunity. There are several issues relating to the development of brown field sites which are evident in the corridor. These include; site remediation costs (i.e. removing existing structures/lines and site clean-up), access issues, linkages to road/pedestrian networks and services. These site specific constraints need to be addressed in any redevelopment in addition to the standard contributions i.e. affordable housing.</p> <p>Much of Network Rail's concerns about the AAP's Preferred Options and the Planning Brief for the</p>

			<p>Railway Corridor lands relates to the aspiration for the relocation of the Gloucester Rugby Club to the (Northern) Triangle site and the generally high level of contributions for the Corridor that are required to effect access, open space and development improvements to the area.</p> <p>While Network Rail agrees with many of the broad, regeneration objectives for the development of the corridor, there are several aspirations which exceed the capability of the sites to deliver upon. The range of contributions sought has an adverse impact on the likelihood of the development of this area and we have concerns about these documents' impact on the likelihood of viable schemes coming forward for the sites in the Corridor. The policies as proposed, instead of encouraging regeneration and redevelopment, will act to stymie new development occurring in the Railway Corridor.</p> <p>This concern is compounded by the fact that the alternative option for the relocation of the rugby club has appeared to raise aspirations about the scope and nature of the contributions achievable on the site when there is, as yet, no available feasibility study about whether the proposed relocation will be viable, how it will function within the site, and its timing. It is therefore inappropriate to provide for the Community Stadium aspiration until outcome of study is available and there is consensus amongst the affected parties that this is a realistic alternative.</p>
<p>1400 LXB Property Partners</p>	<p>The Railway Corridor</p>	<p>Support</p>	<p>The Central Area Action Plan encourages the comprehensive redevelopment of the Railway Corridor, with the Triangle (north) considered capable and necessary to kick-start the redevelopment of the entire Corridor. Whilst this may be the case, there are also very sound planning grounds in support of the principle of bringing forward this brownfield site in its own right. It does not need to be solely associated with the redevelopment of other land simply because it falls within the same ownership.</p> <p>The AAP also promotes a comprehensive approach in order to facilitate the release of the Great Western Road Sidings. This principle is not challenged but there should be no link which defers the redevelopment of the Triangle (north) until Great Western Road is also ready for development. The Triangle (north) has been available for reuse for some considerable time. Further it is capable of independent redevelopment which would provide both the required access to the Triangle (south) and, potentially, act as a catalyst for the other rail sites.</p> <p>Policy CA23 allocates The Railway Triangle (northern side) for:</p> <p>'B1, B2 or B8 employment uses or an alternative use or mix of uses of greater community benefit including a Community Stadium'.</p> <p>LXB Property Partners is of the informed view that the proposals for employment use or a community stadium are unrealistic and undeliverable due to the challenging viability issues relating to the site. It</p>

			is considered that a residential scheme is a more appropriate and viable use for the site and that this should be recognised in the policy. The reasons for this are set out below.
1400 LXB Property Partners	The Railway Corridor	Comment	<p>In assessing the future policy approach to this piece of land, it is important to consider previous designations relevant to the site. Whilst the review of the Local Plan has now been abandoned, the Second Stage Deposit Local Plan 2002 has been adopted for development control purposes prior to the adoption of the Local Development Framework Documents scheduled for 2007. The Second Stage Deposit Local Plan designates the Triangle as an "Old Employment Site" and identifies it as suitable for B1 and B8 uses. It was not put into the higher status categories of Strategic or Locally Significant Employment Sites.</p> <p>Paragraph 7.22 of the Local Plan states that the designation is long standing and that the site has a poor environment, access and ground conditions which handicap the site's redevelopment. As a consequence the site has failed to attract modern business and remains undeveloped. It is also stated that Council consultants, Chesterton, considered that this situation was likely to continue.</p> <p>Chesterton also advised that modern businesses requires prestigious sites with excellent accessibility and surrounded by successful businesses. In recognition of the limited prospects for employment redevelopment, the Plan noted that "a proposal for an alternative use may therefore be better than these allocations remaining undeveloped."</p> <p>As long ago as 2002 it was considered that an alternative use of the site may be better than this allocation remaining undeveloped. However, in 2006, the site continues to be vacant and underused and also without any development interest for B1 and B8 use as promoted in the Local Plan.</p>
1400 LXB Property Partners	The Railway Corridor	Comment	<p>The site is currently in use by Network Rail as a maintenance depot and lies adjacent to the railway. It is also bordered by Metz Way, an elevated vehicular carriageway serving the City Centre. The main pedestrian and vehicular access to the site used by members of Network Rail's staff is via Blinkhorn's Bridge Road. The site is covered by areas of hardstanding, scrub, buildings which are still in active use and some which are now in a derelict state. The site has a poor appearance and is highly visible from both the railway and carriageways entering the City; portraying a negative image to visitors. The site is underused and in need of remediation. It lies just to the east of the City Centre, close to employment, public transport and is surrounded by an established residential community and associated facilities.</p> <p>Overall, this land represents a characteristic brownfield site, the redevelopment of which is strongly promoted by Central Government. Further, it is an area of land which has been underused for some time.</p>

			<p>The Railway Triangle is a complicated and costly site to bring forward with development. Otherwise, it would have been progressed many years ago. The issues affecting the site's viable redevelopment potential might be summarised as:</p> <ul style="list-style-type: none"> - Site remediation costs - Poor existing access and the need to introduce a new access fro Metz Way - Constraints within the local highway network - No existing services to the site and the extra costs of introducing these across the railway line and/or Metz Way - The need for high quality design at this gateway location - The need for a form of development which will reintegrate the site into the surrounding urban area <p>However, the site also offers opportunities for the reuse of a major, and underused brownfield asset in the City Centre and the achievement of uses capable of contributing to the local area. To achieve this, however, a responsive planning policy context is require in order to facilitate and promote redevelopment. The Area Action Plan is, clearly, a key policy document in this respect.</p>
<p>1400 LXB Property Partners</p>	<p>The Railway Corridor</p>	<p>Comment</p>	<p>In recent years, numerous development options have been explored for the site, including employment, retail and a mix of uses. All have proved unviable, which clearly indicates that the B Class Uses promoted in the policy will prove incapable of implementation and, consequently, in delivering a comprehensive redevelopment of the wider area. This point was recognised in the Second Stage Deposit Local Plan and, more recently, in the Central Area Action Plan Issues and Options document. It is disappointing and inappropriate that the Local Development Framework should continue a policy approach which is already acknowledged to have failed. This approach has no greater chance of success in the future and will only lead to the sterilisation of this brownfield site and, consequently, the wider Rail Corridor. The investigations of LXB make it clear that there is no realistic prospect of the Triangle (north) being brought forward with B Class development in the suggested timescale.</p> <p>Policy CA23 also expresses a requirement for landmark iconic buildings on the Triangle site, which is seen as a key gateway into the City. However, this type of high quality design is most unlikely to be delivered via the B Class Uses likely to be attracted to this site. B2 and B8 buildings will, clearly, be unable to deliver. Whilst B1 uses, in theory, may offer the prospect of landmark architecture, such users are most unlikely to be attracted to the Triangle site. The Area Action Plan recognises that there is a poor office market in Gloucester (paragraph 4.4 bullet point 4) and, what interest there may be, will wish to locate at a better quality office location than could be created at the Triangle (north).</p>

			<p>Characteristically, this type of former rail land might be seen as suited to B2/B8 "sheds" which will not only fail to deliver a high quality of design, but will also be incapable of funding the necessary access from Metz Way which is critical to opening up both the Triangle and the whole of the Rail Corridor.</p> <p>Paragraph 6.8 of the Area Action Plan suggests that the Railway Triangle will be used to house businesses displaced by redevelopment elsewhere in the City Centre. By default these are likely to be 'bad neighbour' and poor quality businesses. It is most unlikely that high quality office uses will be relocated out of the City Centre to this site - they would be encouraged to stay in the City Centre. This approach would, therefore, fail to deliver landmark buildings and would be unable to fund the high costs of redevelopment of the site.</p> <p>It is also the view of LXB that it is an inappropriate policy to use a key, brownfield, gateway site with acknowledged high development costs as a centre for the relocation of non-conforming uses displaced from other sites where more viable redevelopment is being allowed. Such an approach places the Triangle (north) site at a material disadvantage in terms of establishing a viable future redevelopment.</p> <p>If redevelopment per se, the achievement of landmark buildings, the release of the wider Rail Corridor and the provision of a wide range of infrastructure improvements are the Council's aims it is the firm view of LXB that this will only be achievable through redevelopment for residential purposes.</p>
1400 LXB Property Partners	The Railway Corridor	Comment	<p>The Central Area Action Plan Issues and Options document, published in October 2005, continued to highlight the redevelopment potential of the Railway Triangle Site but acknowledged the difficulties in bringing it forward. It noted that, whilst the site had been allocated for employment for some time, there had been no firm interest in taking it forward. It also recognised that, to avoid the site remaining "derelict and unkempt" for a longer time, it may be appropriate for the Council to consider releasing it for other uses.</p> <p>The consultation, therefore, asked for suggestions for its future use. In particular, it acknowledged that;</p> <p>"The promotion of a use that creates a higher development value than employment development would be the key to unlocking the development potential of this site." (para 8.18)</p> <p>Network Rail, as landowner, made representations to this document and I attach a copy at Annex Two.</p>
1400	Community Stadium	Object	<p>Meetings of the Gloucester Heritage URC have discussed the delivery of the community stadium on this site. The URC has recognised that other similar stadium schemes across the UK have only been</p>

<p>LXB Property Partners</p>		<p>possible through large scale public funding, e.g. East Manchester. The URC has also recognised that significantly less public money will be available in Gloucester and that the Council will have to 'self-fund' by recycling existing assets and achieving investment from key participants. The URC proposes that the stadium could also include office uses, student accommodation, hotel and conference facilities.</p> <p>LXB estimates that the costs of building the stadium would be likely to be in the region of £20-25 million, excluding site remediation, servicing and access. LXB also understands that no robust case has been made regarding financial viability or deliverability on this particular site. There are, therefore, a number of significant and fundamental question marks surrounding the realism of the development of a community stadium on the Triangle (north).</p> <p>Accordingly, we are of the view that it is inappropriate and materially premature for the Council to include in a Local Development Document proposals for a community stadium which are unproven and appear likely to be undeliverable. In particular, to apply these proposals without a fallback position should the stadium fail to materialise. This will have the effect of resisting more viable options for the redevelopment of this key brownfield site at a gateway to the City.</p> <p>Key items yet to be considered and proven include the specific access requirements of a stadium. Public transport would need to serve the site and a large amount of car parking would have to be provided. Paragraph 8.230 of the Central Area Action Plan states that significant capacity problems are already experienced on Metz Way and that any proposed access junction layout must not result in an unacceptable increase in delay on Metz Way. The nature of a stadium is such that large numbers of people would be arriving and leaving in relatively short time frames. This may be expected to create unacceptable stress levels on Metz Way; contrary to the requirements of the Area Action Plan.</p> <p>It is also unproven that the site can physically accommodate a 25,000 seat stadium, associated servicing and parking plus the supporting uses required to fund the development. There is no analysis to date that shows that this can be achieved, which strengthens the recommendation on behalf of our client that the community stadium designation be omitted from the policy.</p> <p>Fundamentally, LXB challenges the City Council's decision to include a Community Stadium within proposals for the site and believes that the necessary policy development and analysis processes may not have been fully applied. This may simply be the result of the GHURC Stadium aspirations emerging just before the CAAP consultation but, essentially, this appears to have resulted in the Council putting forward a development option which has not been tested. The GHURC has yet to carry out a feasibility and viability appraisal of the stadium proposal and it is clear, therefore, that this form of</p>
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			<p>Objective 9 of the Plan aims to raise perceptions of City Centre living to encourage an improved evening economy. The confines of this objective are currently limited to the contribution that City Centre residential schemes, i.e. Blackfriars, Greyfriars and Gloucester Quays, will make to this objective. LXB considers that the Railway Triangle is an edge of centre site which is well within cycling and walking distance to the City Centre. The community which LXB aims to create on this site will not only add to the cohesion of surrounding communities adjacent to the site but also contribute to the aspirations for an increase in the attraction of City Centre living. This prominent site offers clear potential to contribute to this aspect of the City Council's strategy and should be taken on board in a revised Policy.</p> <p>In reflection of the above comments, LXB Property Partners proposes that policy CA23 should be a re-phrased as follows:</p> <p>'The City Council's priority is achieving redevelopment of this brownfield gateway site and it will be receptive to any development which is capable of successful accommodation within the locality and will deliver the Central Area Action Plan's objectives. The site could be redeveloped for a range of uses, including residential or employment or other.</p> <p>Should proposals come forward for a Community Stadium, the Council will consider them against the same tests.'</p>
1445	Comment	Priority Area 6 - The Railway Corridor	<p>This area has archaeological potential but little information is included in the Action Plan concerning the potential nature of the archaeological remains nor the processes for dealing with them. Accordingly, it is recommended that appropriate information is added.</p>
1447	Comment	Priority Area 6 - Railway Corridor	<p>There does not appear to be any reference to the WLP allocation in the northern section of the railway triangle, or Allstone Sand, Gravel and Waste Transfer Station to the north of the triangle (off Myers Road and Horton Road), which is covered by Policy 7 of the WLP. Paragraph 8.210 would seem to be the appropriate place for such references. The main points of the comments above (relating to the railway triangle brief) should be outlined under the banner of Priority Area 6.</p> <p>It would seem appropriate to include under the 'Site-Specific Obligations' section under 'The Railway Triangle (Northern side)', a bullet point which recognises the need to accommodate the WLP allocation in this area within the Railway Corridor Area or another area of the City. This would be consistent with the bullet under site specific obligations for the Horton Road Siding and land accessed off Myers Road which refers to the 'relocation of bad neighbour uses.'</p>
1449	Object	Priority Area 6 -	<p>Whilst appreciating that the LDF does not make assumptions about the probability of the GHURC</p>

Gloucestershire County Council		Railway Triangle	delivering a 'Stadium' on this site we are concerned that the potential movement of over 20,000 people within a relatively short-space of time at the beginning and end of matches and events will not be efficiently achieved using only buses. Should the Stadium not be delivered then the alternative B1 use will also require significant investment in non-car modes of access. We do however acknowledge the safeguarding of land for a high speed bus (Policy CA23) link to ITEC - Integrated Transport at Elmbridge Court (including the proposed Gloucestershire Parkway and Park and Ride) but would wish to make it clear that no development should at this stage 'depend' upon the scheme which has not yet received approval. We also recognise that at approximately 1.5km from Clarence Street, good walking and cycling links with the City Centre and existing network will contribute to the solution to this problem, but must point out that this potentially falls short of the access standards applied to new development.
1449 Gloucestershire County Council	Support	Priority Area 6 - Railway Triangle	We welcome the acknowledgement (in paragraph 8.230) that, whilst Metz Way is the only suitable means of access to serve a comprehensive redevelopment of the Railway Triangle (paragraph 8.229), the route already has significant capacity problems (paragraph 8.230) and any access to the site should not exacerbate the situation. However we would stress that the acceptability of any delay caused must be the decision of the Highway Authority.
1477 D J Walsh	Support	CA.23 - Railway Corridor	<p>The area has long been unkempt and embarrassing and a thoughtful restructuring of the space would be a vast improvement to the City. Broadly speaking, housing would not be regarded as a good promotion for this railway environment and employment facilities would certainly generate higher volumes of traffic around the location.</p> <p>Initially my view is that consideration must be given to the primary issue - which is likely to be vehicular access into the triangle, and at which hours of the day. Any agreeable development that constitutes the final decision for this zone ought to produce a minimal amount of traffic in an area which is already at bursting point at both the morning and afternoon 'peak' hours.</p> <p>It would seem that access from Metz Way would probably be most suitable in light of the current elevation, its layout and purpose - although possibly just about workable. There seems little opportunity to create a viable entry from the Horton Road side that also suffers particular congestion problems due to heavy lorries and the railway crossing gates. Similarly, there is no easy route from the Barton side. Plus, there is no obvious entry from the Barnwood/Elmbridge area to the north. Therefore it would seem likely that a new or improved route would have to be generated from the service roads somewhere along the west aspect of Eastern Avenue, thereby increasing the present volume of traffic on Eastern Avenue, notwithstanding the need for additional bridgework.</p> <p>As a result I would think the greater benefit to the community might be something that offers Gloucester citizens entertainment and leisure facilities accessible for light traffic during the day but</p>

<p>1377</p> <p>Gloucester Hospitals NHS Foundation Trust</p>	<p>Comment</p>	<p>Policy CA.23 - Railway Corridor</p>	<p>with perhaps greater attraction during the evenings and weekends.</p> <p>The Gloucestershire Hospitals NHS Foundation Trust is supportive of the efforts being made by the Council to develop the City and to promote sustainable development. The comments that are put forward in these representations are concerned with safeguarding the efficient functioning of the Gloucestershire Royal Hospital; maintaining accessibility for emergency and other hospital traffic, and ensuring that adequate parking for essential hospital needs is available. The trust would welcome the opportunity for continuing dialogue with the City Council to ensure that these objectives are met in the context of major developments in the surrounding area.</p> <p>The consequences of significant residential development in terms of demands placed on the wider Health Community will largely be felt by the providers of Primary Care. The new Primary Care Trust for Gloucestershire will also need to be kept informed of these proposals, be part of the dialogue with the City and included in assessments for infrastructure provision by developers.</p> <p>All proposals for the Railway Corridor, Kings Square _ the Bus Station and the former Kidzone Activity Centre, will affect traffic in the vicinity of the hospital, including access for emergency vehicles. It is vital that all proposals, both singly and cumulatively are carefully assessed to ensure that emergency access to the hospital is not impeded. Some proposed uses will increase traffic levels generally, whilst others (for example the Community Stadium) could concentrate traffic movement into specific times of the day. The operational activities of Gloucestershire Royal Hospital must not be jeopardised by access and traffic congestion. Gloucestershire Royal Hospital provides acute care for the County's population and its role and importance will increase over the coming years.</p> <p>Unimpeded access to the hospital site is required at all times. Emergency vehicle response times are critical. The ability of the patients and visitors to achieve ready access are also of key importance. The suggested possible closure of the level crossing to all vehicles would remove one of the routes to the hospital and should not be undertaken until without full consultation with the Trust and emergency services. Additional traffic light junctions should also be planned with emergency vehicles in mind.</p> <p>Consultation with the Gloucestershire Hospitals NHS Foundation Trust should take place at regular intervals to ensure that both policy and development proposals do not adversely affect the operation of and accessibility to the hospital.</p> <p>Development on the Railway Corridor site will have an adverse impact on the hospital site, in terms of traffic generation and potentially car parking and noise. Some of these points have been covered within the Railway Corridor section but not specifically in terms of the hospital. We suggest that a paragraph is inserted that specifically relates to the impact of the Railway Corridor on the hospital site</p>
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			<p>and that mitigation measures and consultation will be required.</p> <p>The preferred options now includes car parking for the proposed magistrates court at the former Telecom House site, sufficient for staff and visitors, and this should prevent any impact on car parking within the hospital site. There is no mention of car parking for the other development sites on the Railway Corridor however there is still a concern that a lack of parking on the Railway Corridor site will lead to visitors seeking to use the hospital parking spaces, which are already in high demand. We suggest that details and obligations for car parking are included for all development in the Railway Corridor, in addition to the general parking policy at CA.41.</p> <p>Policy CA.23 - The Railway Corridor, includes site specific obligations for each of the sites within the area. It is only the former Telecom House Site that specifically requires sufficient car parking to be provided for visitors and staff. We consider that this should be an obligation for all development in the Railway Corridor. There should also be an obligation to provide financial contributions to health care for any residential development on the Railway Corridor area.</p> <p>The suggestion that a large stadium is located within the Railway Corridor creates a particular concern in terms of the traffic implications. This is referred to in our comments on the relevant Planning Brief.</p>
1426	Comment	Railway Corridor	<p>- There was no objection to the stadium complex in the railway triangle but concern was expressed on the need to keep communication links nearby.</p> <p>- Reference is made to the proposed Parkway station and yet no reference is made to the existing bus / train stations even though the proposed Parkway station is only a proposal at this stage. Strong feelings were expressed over this.</p>
1484	Object	CA.23 - Railway Corridor	<p>These proposals have already been the object of strident opposition in the pages of the Citizen which have either been dismissed or brushed aside by the current Council and commercial interests.</p> <p>Repeated statements from residents have time and again have made the point that a new railway station should and could be built on the triangle. Financial constraints are no valid objection to this, and if the Councillors only had the will and courage to state that nothing but a new station would be acceptable on the site, then they would win the day. But cynicism says they wont.</p> <p>The site is already railway property, and there is ample space to construct a three-sided station with access from Metz Way.</p> <p>Just for once, please listen to what the majority of residents want.</p>
1548	Object	CA23 - Railway Corridor	<p>Current road access in this area is appalling often compromising emergency access to the hospital. The proposals will worsen the situation. Recent housing development on Horton Road has worsened</p>

Mr Nick Oldnall			the situation already. High-density development leads to on-street parking and problems. The proposed stadium within a residential area is not supported. Whilst redevelopment of the site is supported in principle, it is important that a current eyesore is not turned into a new one. Density of development should be reduced.
1702 Mr John Rednar	Comment	CA.23 - Railway Corridor	Should look forward and offer the site for a venue for the 2012 Olympics. Gloucester would be on the Olympic map and problems of fewer trains would automatically diminish.
1528 C Reeves	Object	CA23 - Railway Corridor	Object. Retaining emergency and pedestrian access via Blinkhorn's Bridge Lane will lead to the Armscroft area becoming an overspill car park. More traffic will lead to noise, disturbance and risk of crime. The provision of a 'green link' will cause the same problems. In reality people will try and park as close to the stadium as possible and then walk. This route should be used for emergency vehicular access only with a locked gate to be opened by emergency vehicles only. This would also improve crowd control. Also concerned about the noise and disturbance from the stadium particularly for evening events including concerts. Concerned about the impact of large-scale development on drainage and sewerage. Land north of Horton Road sidings is at a higher level. If the development goes ahead it may cause flooding in the Armscroft area.
1497 Chantal Kawczynski	Object	Concern over use of Blinkhorns Bridge Rd	Concern over use of Blinkhorns Bridge Road by emergency vehicles due to narrow width of road. Object also to pedestrian access as people will park and walk to the stadium using it as a cut through. Also likely to be problems of noise, litter and potential vandalism.
1497 Chantal Kawczynski	Object	Objection to Railway Corridor proposals	Support the concept of a community stadium for Gloucester but do not feel that the triangle site is suitable. It is likely to have negative impacts on the surrounding area in terms of noise, traffic and parking. Particularly concerned about the lack of parking provision and the potential impact on surrounding residential areas. People will not use public transport or walk, they are more likely to park close to the stadium in residential areas and walk.
1569 Maria Apperley	Object	Policy CA23 - Railway Corridor	Concerned about the development of the railway corridor. The status of Horton Road is unsatisfactory with poor road surfacing. There is not enough space for parked cars, school traffic and the allocation is likely to increase congestion. Lorries that use Myers Road drive fast with little consideration. The addition of construction traffic will make things worse. A community stadium will also add traffic to

			roads that are not well suited. Late night events may cause amenity problems for surrounding residential areas.
1583 Barton and Tredworth Community Group	Comment	CA23 - The Railway Corridor	Should focus on improvement to existing station. Support for principle of community stadium. Good access of Metz Way. Need for rail and bus links and on-site parking. Should incorporate pedestrian/cycle link to the local area. Concern about overspill parking from stadium. Resident permit parking schemes not favoured. If stadium goes ahead, should be planning for major events. Link to Hartbury College for equestrian events. If no stadium, then light industry, rail freight. Any new uses should provide jobs for the local community. Some support for large-scale retail units.
1537 G T and S J Johnson	Object	CA.23 - Railway Corridor	This site should be used for a new railway station for Gloucester.
<u>The Canal Corridor (Priority Area 7)</u>			
0941 British Waterways South West	Comment	Paragraph 8.249	British Waterways welcomes the inclusion of a canal corridor as a priority area and particularly the inclusion of Monk Meadow Trading Estate and land between Bristol Road and the Canal.
0941 British Waterways South West	Comment	8.282	Although Bristol Road mainly has an employment focus, there is an opportunity to consider mixed-use development at the southern end of the Canal Corridor as well as the northern end.
0941 British	Support	8.291 - 8.294	British Waterways supports the four principles set out in these sections as they will encourage high quality development that positively addresses the canal corridor.

Waterways South West			
1445 Gloucestershire County Council	Comment	The Canal Corridor	There are some areas of archaeological potential within the canal corridor. It is recommended that these are evaluated at the planning application stage, rather than leaving the archaeology to be dealt with at the post-determination stage through a watching brief (cf paragraph 8.113). Watching briefs can be an ineffective means of dealing with archaeology of unknown potential if no evaluation has first taken place.
1447 Gloucestershire County Council	Object	The Canal Corridor	There does not appear to be any reference to the WLP allocation adjacent to the Gas Works on Bristol Road, or the Reclaimed Canal Land at Netheridge. There should be.
1449 Gloucestershire County Council	Support	Bristol Road	We support the identification of the Bristol Road as a 'Key Public Transport Route' in the section on Priority Area 7 'Canal Corridor' and agree with the assessment in paragraph 8.295 on 'Traffic and Transport' that it represents a significant barrier to movement and that the opening of the south-west bypass will present an opportunity for it to become a 'high quality public transport corridor'. In support of this, work is now underway at the County Council to complete a strategy for providing the best possible system of bus priority along the length of the Bristol Road from Southgate Street to the Cole Avenue junction that is practically possible and both publicly and politically acceptable. We welcome the 'Obligations' to provide contributions to remove the old railway bridge on the Bristol Road, between Hempsted Bridge to the south and the Tuffley Avenue junction to the north, and various bus priority measures along the length of the Bristol Road which will provide funding for this strategy.
Policy CA.24 – Land Between Bristol Road and the Canal			
<u>Paragraphs 8.257 – 8.264</u>			
0171 Bovis Homes Limited	Comment	Policy CA.24 - Bristol Road/Canal	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in</p>

			<p>particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0445 Environment Agency	Comment	Policy CA.24 - Canal/Bristol Road	Site specific obligations for this site should include a flood risk assessment and ground remediation as appropriate. Site obligations in respect of contaminated soil or groundwater should have regard to long-term monitoring (e.g. monitored natural attenuation) to ensure the wider environment is unaffected and that remedial objectives will be achieved. Whilst this may be achievable though planning conditions, time scales may require a legal agreement.
0629 Robert Hitchins Limited	Object	CA24 - Land Btwn Bristol Rd and Canal	Support the identification of this area for mixed-use development. Further guidance should be given however regarding the timing of the preparation of a planning brief for the area. The document should include a plan showing clearly which area this policy applies to.
1442 Cavanna Homes (South West Limited)	Object	CA24 - Land btwn Bristol Rd and Canal	Support the retention of this site as a commercial area. It is important that this area continues to be supported by local services and employment.
1461 Windowmaker	Comment	CA.24 - Land bet Bristol Road/Canal	<p>Madleaze Industrial Estate being an Industrial Zone, necessarily generates a level of activity which could be deemed incompatible with the suggested residential occupation of the land under discussion.</p> <p>This includes night operations, intermittent noise generated by truck arrivals, loading and unloading, fork truck movements with their associated safety warnings, background process noise from ventilation units and so on. Whilst these meet the environmental requirements for an industrial zone they could be at odds for individual opinions from a typical residential development.</p> <p>Additionally, access is an important factors for regular deliveries etc, and the likely increase in vehicular activity including off-road parking, could exacerbate an already demanding situation.</p> <p>The units in the estate represent key employment opportunities for the immediate residents and any restrictions imposed by such a development could limit the future employment in this area.</p> <p>We would wish for very careful consideration to be given to these matters as the proposals are developed and would ask to be kept informed.</p>
1458	Comment	CA.24 - Land	We are writing as the owner/occupier of 117 Bristol Road and 130 Bristol Road to comment on the

Warners		Between Bristol Rd/Canal	<p>future of this area.</p> <p>The roadside of Bristol Road is an important commercial area and care should be taken not to stop through-traffic on this section of road. If the road were no longer a through-route it would have a serious effect on the businesses that are situated in this area.</p>
1488 Mr John Nash	Object	CA24 - Bristol Road and Corridor	Concern about potential interference with existing light industrial area which is running smoothly. The Council should focus on redevelopment of other sites including Blackfriars, the Railway Triangle and 111 Southgate Street.
1590 Peel Developments UK Limited	Object	CA.24 - Bristol Road/Canal	Peel Developments would welcome discussions with the Council in the context of the Council's proposal for a new local centre in the Madleaze Road/Bristol Road area and the Council's proposals for the area immediately to the south (in the Canal Corridor) where post-2013 mixed-use development is referred to.
1541 Prima Dental Group	Support	CA.24 - Bristol Road and Canal	<p>Strongly support the overall vision of the plan.</p> <p>Concerned about the relocation options that may be forced on the company - as an employer of 120 people.</p> <p>Trust that the local employment and environmental issues in this context will be fully considered and suitable help for local employers in our position will be considered.</p>
<u>Policy CA.25 – Industrial Sites, Bristol Road</u>			
<u>Paragraphs 8.265 – 8.266</u>			
0171 Bovis Homes Limited	Comment	Policy CA.25 - Ind. Sites, Bristol Road	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p>

			We would like to withhold further comment on these individual sites.
0445 Environment Agency	Comment	CA.25 - Industrial Sites Bristol Road	See comments to Policy CA.24.
1470 Wil El Mil Engineering Limited	Object	CA.25 - Industrial Sites, Bristol Road	<p>We would like to express our serious concerns regarding the planned redevelopment of the sites formally St Gobain Abrasives and the chemical factory.</p> <p>We own an engineering business adjacent to these sites and are concerned that the land which was previously for industrial use will be given over to residential use. The implication of this for our business would be serious and potentially fatal.</p> <p>Security and vandalism has been a longstanding problem, which is likely to increase if an open area or nature reserve is provided along the boundary.</p> <p>Heavy lorries deliver to our site several times daily from 7am onwards. This will cause disturbance to any residential properties within site or earshot of our premises.</p> <p>We have large doors in our workshops close to the boundary, which are regularly open for materials movements in the winter and are permanently open for ventilation during the summer. Our factory operates from 7am until 6pm Monday to Friday and Saturday mornings. As our workload continues to increase this will extend to a nightshift. Again the general workshop noise generated is likely to cause disturbance to any residents nearby.</p> <p>Our yard is floodlit and the light generated could result in complaints from neighbouring residential properties.</p> <p>From experience elsewhere it would not be long before complaints from new residents against long established businesses nearby lead to restrictions that would make us question our future activities.</p>
1422 Mr Gareth Hughes	Comment	Policy CA.25 - Ind. Sites Bristol Road	<p>There appears to be little or no details on this application. How many houses? Where are the access roads? Who, what, where, when why and how?</p> <p>Access roads are a main concern, as traffic calming is present in Tuffley Crescent, and Traffic in the Bristol Road is hectic. I expected to see much more detail, but most text boxes are empty?</p>

1703 Aurora Property Company Limited	Comment	CA.25 - Industrial Sites, Bristol Road	The policy refers to 'ground remediation as appropriate'. From the investigations that have already been undertaken by my clients, there will be significant costs incurred in remediation and this level of cost must be reflected in the levels of future development of the whole site.
1703 Aurora Property Company Limited	Object	CA.25 - Industrial Sites, Bristol Road	It is my clients' firm opinion supported by the national housebuilder that this site is capable of a higher density to provide more than 250 dwellings, in line with PPS3 - Housing. In addition, there should also be a widening of the uses for this site to include leisure uses.
1703 Aurora Property Company Limited	Comment	Paragraph 8.266	Please incorporate a statement that my clients, in conjunction with a major national housebuilder, have prepared a masterplan and development brief for the whole site, incorporating all three ownerships. It is intended to submit this document to the Council for discussion in the very near future.
1557 Mr A H Simpson	Comment	CA25 - Industrial Sites Bristol Road	No objection to the development of these three sites for residential and employment use. Concern expressed over potential loss of established trees and impact on wildlife. The trees should be subject to a protection order.
1513 Nick & Cheryl Spencer	Object	CA.25 - Industrial Sites Bristol Road	<p>The existing waterway which runs through this site should be opened up again as a natural feature. The existing green area should be preserved as a nature reserve. Concerned about the potentially large increase in traffic. Tuffley Crescent is used as a cut through from Podsmead Road to avoid traffic lights at the junction with Tuffley Avenue. Tuffley Crescent should therefore become a no through road with a barrier at Podsmead Road end. Any access road from Tuffley Crescent must be sited well away from existing houses.</p> <p>It is hoped that lorries and light vehicles will only have access to this site from Bristol Road.</p> <p>Consideration should be given to the inclusion of shops, schools, restaurants, doctors etc. within the development.</p> <p>If development is not likely for some time, the existing buildings should be demolished in the short-term to avoid problems of vandalism and arson.</p>

			Any new residential development should not overlook existing residential properties.
<u>Policy CA.26 – Monk Meadow Trading Estate</u>			
<u>Paragraphs 8.267 – 8.268</u>			
0171 Bovis Homes Limited	Comment	Policy CA.26 - Monk Meadow Trading Est.	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0445 Environment Agency	Comment	Policy CA.26 - Monk Meadow T/E	See comments to policy CA.24.
0941 British Waterways South West	Support	Paragraphs 8.267 - 8.268	British Waterways welcomes the allocation of this land for residential development. Initial assessments of the site have indicated that it would be suitable for 150 dwellings. British Waterways therefore objects to a limit of 125 dwellings being set for this site in Policy CA.26. If this figure is amended British Waterways will be fully supportive of this policy.
<u>Policy CA.27 – British Gas Site</u>			
<u>Paragraphs 8.269 – 8.271</u>			
0171 Bovis Homes	Comment	Policy CA.27 - British Gas Site	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning</p>

Limited			<p>constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0445 Environment Agency	Comment	Policy CA.27 - Transco Site Bristol Road	See comments to policy CA.24.
1362 National Grid Property Holdings	Object	CA.27 - British Gas/Transco Site	<p>National Grid Property Holdings Limited ('National Grid') previously commended on this site at the issues and options consultation stage and argued against the proposed retention of the longstanding employment allocation for the very fundamental reason that this would not secure the viable regeneration of the site. In this respect, reference was made to the viability report prepared for an on behalf of National Grid and issued to the Council at the time showing the employment uses proposed through this allocation to be unviable by a very considerable and substantial margin.</p> <p>The Council has always appreciated and understood the importance of returning this site into a viable use and this is why it acknowledged the possibility of some residential development coming forward on the site in its issues and options consultation paper. National Grid is therefore surprised and disappointed to see this reference now deleted in the preferred options consultation paper. The reasons given for this is that neither the location nor context (in terms of surrounding uses) of the site lends itself to residential use. Furthermore, a doubt is expressed at the ability of the site to connect with the existing residential area to the east.</p> <p>In this respect, National Grid has already demonstrated to the Council how a residential use could be accommodated on the site in amenity terms and the ability to integrate such a development with the surrounding area.</p> <p>However, the Council is continuing to overlook the important viability conclusions that have been drawn. Indeed, the Council needs to be aware that the viability report originally issued to the Council actually under-estimates the true extent of the employment unviability because no account was made in the viability assessment of the demolition and remediation costs associated with the existing gas</p>

		<p>holder, nor indeed, the holding costs of the operations needing to be retained on site (which include the existing National Grid offices).</p> <p>In this respect, National Grid notes that the boundary of the site has been incorrectly drawn insofar as it excludes the gasholder on the Bristol Road frontage. This should also form part of the overall redevelopment site.</p> <p>The Council has identified the need for gap funding to assist its continued employment ambitions on what is acknowledged to be a 'heavily contaminated site'. However, the Council should be in little doubt as to the amount of gap funding needed to try and deliver its preferred employment use on this site. It represents a considerable and substantial sum of money and with the GHURC having already indicated to representatives of National Grid that its Business Plan for the next three years is unlikely to make any capital allowance for this site, its employment deliverability can and must be questioned.</p> <p>Furthermore, in discussion with the GHURC, National Grid was told the site is needed to accommodate the business interests being displaced by other regeneration commitments elsewhere in Gloucester over the next 12 - 18 months. However, in its most recent meeting with GHURC, National Grid was advised that this is no longer the case (with other sites seemingly available to meet those relocation needs. With the now apparent uncertainty over the ability of the GHURC to secure a gap funding commitment for this site only, at least in the next three years, its business relocation purpose should also be questioned.</p> <p>Notwithstanding the above, the Council has at least recognised that an alternative use to employment may be needed to finally deliver the long overdue regeneration of this site. To this end, National Grid notes (at paragraph 8.271) the references to a retail warehouse club and possible demand from the operator Costco for this site.</p> <p>However, the Council does not explain whether it believes this to be a viable use for the site, or whether this would be equally reliant on gap funding. As such, until National Grid carries out its own assessment in this regard, a judgement will need to be reserved as to whether this use could assist in securing the viable regeneration of the site.</p> <p>That said, viability is so fundamentally important to the successful regeneration of this site that the Council really must consider formulating a more permissive policy allowing other uses such as residential to be considered on their respective individual merits. Otherwise, the currently proposed policy context runs the very real risk of sterilizing this land for the lifetime of the Local Development Framework at least. This cannot be in the best and proper planning interests of the area, particularly</p>
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			<p>as the Council's preferred employment use has so far failed to emerge in the lifetime of the current Local Plan.</p> <p>National Grid also notes the policy reference to a financial contribution being sought towards the removal of the railway bridge and the provision of bus priority on Bristol Road. This is the first such reference made in the very extensive discussions held with the Council over the last four years and leaving aside the very obvious implications this would have on the ability to deliver a viable regeneration scheme, National Grid must also question whether this is actually necessary and/or reasonable.</p> <p>Finally, the reference to 'Transco' in the site description should be removed, as the Council should be aware that its operations on this site have now been transferred to 'Wales and West Utilities'.</p>
<p>1389</p> <p>European Metal Recycling Limited</p>	Support	<p>Policy CA.27 - British Gas/Transco Site</p>	<p>We would most strongly support the proposed use of the site for employment as suggested in the consultation document .</p> <p>We are aware of many sites where Transco have been able to finance the costs of any remediation from such a use and we see no requirement for them to achieve the higher value residential use to finance such remediation here.</p> <p>We would also certainly be willing to buy some of this land and believe there is a ready market for Employment uses in this location.</p> <p>Any residential development immediately behind our site can only prejudice our and other businesses on the estate.</p>
<p>1405</p> <p>Foreign Autoparts Limited</p>	Comment	<p>Policy CA.27 - British Gas (Transco)</p>	<p>We are Foreign Autoparts Ltd and occupy Unit 8 Capitol Park, Pearce Way, Gloucester and have done since the estate was first opened some 16 or 17 years ago. Ever since we moved in we understood that at some time in the future the land of the old gas works would be redeveloped and more industrial units would be built. We didn't think so much time would pass before it happened.</p> <p>The main suggestion we would make is that a traffic light controlled junction onto the Bristol Road will be required. Trying to leave our existing estate onto the Bristol Road can sometimes take several minutes and next years opening of the long overdue bypass probably won't make a lot of difference. In fact it may make the situation worse. Sometimes the only way you can exit Pearce Way is because the traffic has backed up from the Cole Avenue lights. If the amount of traffic travelling out of Gloucester along the Bristol Road especially around 5-30pm is reduced then so will the chances of exiting Pearce Way.</p>

			The only other suggestion would be to have a variety of different sized units on the development, from quite small starter units for modest rents which will assist small businesses going up to much bigger units probably some for lease and some for sale.
1550 Ermin Plant	Support	CA27 - Transco Site	Fully support the improvement of this site for commercial use. Ideal location for employment particularly as the new Hempsted Link Road will improve traffic flow and access. Would be interested in taking new premises on this site if it became available.
1553 Interlink Express Parcels Limited	Comment	CA27 - Transco Site	Would not like to see traffic along Pearce Way increased as a result of development. Industrial use is the best use for the Transco site as we start at 5:30 and have no wish to disturb adjoining residents. The site is however subject to problems of drainage and contamination.
1554 Pirtek (Gloucester)	Support	CA27 - Transco Site	Support the proposed employment redevelopment of this site. A range of sizes of employment units should be provided. There is a shortage of smaller units of 1500-2000 sq ft particularly for sale. Hopefully this development will be sooner rather than later.
<u>Policy CA.28 – BT Depot</u>			
<u>Paragraphs 8.272 – 8.275</u>			
0236 Mr M Aplin	Object	Policy CA.28 - BT Depot	<p>This is contrary to national policy, and the justification is unacceptable. It is has not been allocated with reference to the sequential approach to town centre uses (para. 2.39 of PPS6). This is not the only site but it is time this was enforced and offices were directed to the town centre in order to drive the regeneration of the City Centre. There is ample B1 provision on the periphery of the City. The pattern is already unsustainable (for example lack of choice of means of transport) and has a high opportunity cost in terms of getting workers, expenditure and vibrancy in the city centre.</p> <p>I note it was not consulted on at Issues and Options stage. I understand why the council is resisting a major housing allocation but it would be suited to other non-intensive employment uses. Does the LDF make sufficient B8 provision? This site is appropriate for industry and especially distribution given the South West Bypass and its wider location.</p>
0171 Bovis Homes Limited	Comment	Policy CA.28 - BT Depot	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the</p>

			<p>delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0184 Hempsted Residents' Association	Object	CA28 - BT Depot	The association would prefer to see no development on this site. This would accord with the document comment at paragraph 3.171 that the canal corridor is an important arrival point for people coming into the City and also assist in providing a link between the canal and river for wildlife.
0445 Environment Agency	Comment	Policy CA.28 - BT Depot	See comments to policy CA.24.
0202 MWA Planning and Development Consultancy	Object	CA28 - BT Depot	The site is suitable for either wholly residential development or a mix of employment and residential uses. The policy as drafted recognises that the site is suitable for continued employment use and an element of housing fronting the canal and in close proximity to the bypass and Bristol Road would secure significant townscape and sustainability benefits. Would also reduce the need for further greenfield development.
1442 Cavanna Homes (South West) Limited	Support	CA28 - BT Depot	Support the allocation of this site for employment use. The site could also be used for mixed-use development. The Gloucester SW bypass which is currently under construction will greatly increase the accessibility of this site and is scheduled to be complete by April 2007. The new bypass will provide a strategic link from the M5 and Primary Route Network south of Gloucester to the A417 west of Westgate Bridge.

Policy CA.29 – Land at Netheridge

Paragraphs 8.276 – 8.279

0171 Bovis Homes Limited	Comment	Policy CA.29 - Netheridge	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0445 Environment Agency	Comment	Policy CA.29 - Land at Netheridge	Development of the rowing club and any structures within the identified site will require the submission of an acceptable FRA.
0202 MWA Planning and Development Consultancy	Support	CA29 - Land at Netheridge	Support the principles set out in the policy given that the site is well contained by the bypass and existing development. The use of the canal to transport visitors/workers into the City Centre is also supported.
0529 Councillor Gordon Heath	Object	CA.29 - Land at Netheridge	<p>I refer to the report for the last full Council on 27th July 2006. Planning Policy Sub Committee recommendations, CAAP, page 55 paragraph (n) said;</p> <p>'Referring to policy CA.28 - Land at Netheridge. Members pointed out that it was the only greenfield site within the GHURC area and that great care must be taken to keep it green with high quality landscaping. The Policy, Design and Conservation officer agreed to add this as a site-specific obligation'.</p> <p>My query is that it has not found its way into the policy and it still stands as before.</p> <p>Please amend accordingly.</p>
1450 Gloucestershire	Support	CA.29 - Land at Netheridge	The proposed mixed allocation is supported.

County Council			
<u>Policy CA.30 – Bristol Road Local Centre</u>			
<u>Paragraphs 8.280 – 8.281</u>			
0236 Mr M Aplin	Support	Policy CA.30 - Bristol Road LC	Support
0171 Bovis Homes Limited	Comment	Policy CA.30 - Bristol Road LC	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
1590 Peel Developments UK Limited	Comment	CA.30 - Bristol Road Local Centre	Peel Developments would welcome discussions with the Council in the context of the Council's proposal for a new local centre in the Madleaze Road/Bristol Road area and the Council's proposals for the area immediately to the south (in the Canal Corridor) where post-2013 mixed-use development is referred to.
<u>Policy CA.31 – Kidzone Activity Centre</u>			
<u>Paragraphs 8.315 – 8.327</u>			
0171 Bovis Homes	Comment	Policy CA.31 - Kidzone Activity Centre	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning</p>

Limited			<p>constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
1364 Satnam Properties Limited	Object	CA31 - Land at Kidzone	Support the objectives and vision for regeneration set out in the Central Area Action Plan. Support allocation of land at Great Western Road for redevelopment. Object to deletion of part of site from draft allocation. Reducing the size of the allocation due to the unavailability of part of the site is against national policy which seeks to encourage the re-use of brownfield land. It is also contrary to objectives set out elsewhere in the document which urge landowners to avoid land ownership problems. Concern expressed that the City Council has decided to remove half of this site from the proposed allocation. The whole site should be reallocated.
1450 Gloucestershire County Council	Comment	8.318	<p>Suggest typographic error in last sentence.</p> <p>Amend: "This is set out in draft Policy CA31 below."</p>
1508 JJ's Jungle Limited	Comment	CA.31 - Kidzone	<p>The company has recently signed a 10 year lease with Satnam Industries Ltd for the property formerly known as Kidzone, thus the site is no longer vacant as stated in paras 8.315 and 8.316 of the document.</p> <p>Under the terms of the lease the property is not subject to a development break clause until the third anniversary of the lease.</p>
<u>Policy CA.32 – Cedar House</u>			
<u>Paragraphs 8.328 – 8.337</u>			
0266 Mr Michael Reynolds	Support	CA.32 - Cedar House	Do not believe that new office development would better reflect and enhance the character of this conservation area. Today this site is used as offices, and overall I would suggest they have a detrimental impact on the area. In particular this is signalled by inconsiderate often illegal parking by users of the facilities and the amount of traffic they produce in which is primarily a residential area. This is exacerbated by users of the Registry Office opposite, especially those attending marriage

			<p>ceremony's.</p> <p>Secondly, I would like to challenge the suggestion that new office development would necessarily increase employment opportunities for those living in this locality. Sadly, many would not have the necessary skills to satisfy criteria for such employment.</p> <p>Lastly, but not least, there is little provision of good family housing in this area.</p> <p>Suggest for the area is a mix of family housing and small workshops.</p> <p>I assume that the present Cedar House, in my opinion a building without any merit , would be demolished and replaced by something more sympathetic?</p>
0171 Bovis Homes Limited	Comment	Policy CA.32 - Cedar House	<p>Standard paragraph for policies CA.18 - CA.32.</p> <p>The overall approach is supported however many of the sites identified have building or planning constraints that make their delivery within the plan period questionable. It is also inevitable that the delivery of these sites will fall beyond the anticipated timeframes. We request that these timeframes are regularly reviewed and updated.</p> <p>Failure to deliver these sites could lead to a shortfall in housing and employment land in the short-term future. This could further exacerbate problems with shortage of employment land and housing in particular affordable housing.</p> <p>We would like to withhold further comment on these individual sites.</p>
0276 FOSCA	Object	Policy CA.32 - Cedar House	<p>The Friends of Spa Conservation Area are not in favour of office development on the Cedar House land, which has become the preferred options for this site.</p> <p>We maintain that this land should be used to provide family housing.</p> <p>View remains the same as those submitted to the issues and options consultation.</p>
0284 Land Securities Trillium Limited	Object	CA.32 - Cedar House	<p>Land Securities Trillium (LST) are close to completing a lease renewal until 31st March 2018 for the premises on Spa Road known as Cedat House on behalf of the DWP. The property will also be refurbished extensively to provide the Jobcentre Plus vision which will improve and expand the range of valuable services on offer to members of the public in Gloucester and will result in a large number of staff relocating to this premises.</p> <p>I note in the Local Development Framework Central Area Action Plan Preferred Options Consultation</p>

			<p>Paper that policy CA.32 relates to Cedar House. Cedar House provides approximately 3,482 sq m of usable space to DWP.</p> <p>Under paragraph 8.329 the paper states that 'relocation of the Department for Work and Pensions would provide the opportunity to redevelop the site'. Given that the DWP intend to occupy the building up until and possibly beyond lease expiry it seems strange that the Planning Authority want to relocate a business user from this area merely in an attempt to modernise the appearance of the building it occupies.</p> <p>LST and DWP are investing a large amount of money in the refurbishment and modernisation of the buildings interior in order to deliver the Jobcentre Plus vision. If redevelopment options for this building are pursued and agreed, our client may need to relocate its business to another centre which could result in Gloucester losing a major occupier should there be no other suitable alternative accommodation.</p> <p>Both DWP and LST believe that Cedar House meets the requirements of the Jobcentre function and we therefore feel there is no reason to earmark this building for redevelopment within the LDF and risk losing the range of valuable services the DWP provide from Cedar House.</p>
00346 Wilks Head Eve	Object	CA32 - Cedar House	<p>The allocation of Cedar House is unnecessary. The site is currently in B1 office use and is therefore safeguarded under other policies. In proposing the allocation, the Council has not undertaken a review of existing and potential employment land. There is no evidence to suggest the allocation is needed. The allocation will not necessarily lead to improvements in the character of the Conservation Area. The plan needs to be flexible and recognise and allow for circumstances when a B1 office development may not be appropriate. A B1 office allocation is too inflexible, restrictive and unnecessary. Delete allocation.</p>
1383 Dr & Mrs C P Cutts	Object	Policy CA.32 - Cedar House	<p>We feel very strongly that the Cedar House site, if redeveloped, should be prioritised as the ideal area to create family housing to balance the overdevelopment of high-density housing. This type of development would further enhance the Conservation Area. It would also, with small gardens, courtyards, and tree planting, continue the open space of the park and bowling green almost to the Docks.</p> <p>We appreciate the loss of employment sites in the City and feel that this may be a unique opportunity to mix residential family housing and specialist family provision within the City Centre. Small business units would sit well in a sit such as this and would help the creation of a balanced residential and business mix that has been shown to be successful in driving up the quality of an urban region.</p>
1478	Object	CA.32 - Land at Cedar House	<p>Do not think that Cedar House should be allocated for more office space. The steady increase in office accommodation in this conservation area has done nothing for the overall preservation of this</p>

Mr L A Branchett			<p>historic area. Rather it has distracted from it by the eradication of many open aspects of Spa Road.</p> <p>In view of the fact that the development plan highlights the absence of family accommodation and the preponderance of flat/maisonette type residences, it would be far more in line with your established research if the site were allocated for prestigious Regency style family housing, built in a bio-diverse landscaped setting.</p> <p>In view of the shortage of car parking facilities in this, as well as other areas, I would also suggest a system of residents parking only be introduced.</p>
1526 Geraldine Gregory Davis	Object	CA32 - Cedar House	Current balance of uses in the area needs to be maintained. Businesses moving into the area have caused problems and the balance is now in their favour. Opportunity should be taken to provide family housing on this site to redress the imbalance. The provision of high class family homes on the site would both preserve and enhance the area. When considering any development of the site, the concept of biomass heating should be explored.
1527 Janet Illingworth-Cooper	Object	CA32 - Cedar House	Object to allocation of site for employment use. The site should be redeveloped for quality family housing which would truly enhance the area. No evaluation of the availability of housing land has been taken at the local level. The Council should also have more regard to the amount of office development already in progress or on the drawing board.
<u>Existing Commitments</u>			
<u>Paragraphs 8.338 – 8.339</u>			
1590 Peel Developments UK Limited	Support	Existing Commitments	Peel Developments welcome the recognition of Gloucester Quays as being 'fundamental to the regeneration of the Central Area' at paragraph 3.11 of the CAAP and the acknowledgement that, as Central Area mixed-use commitment MC.3, it 'will have a large influence on the City and will help to attract further investment and regeneration of the Central Area' as set out in paragraph 8.339. The Council will be pleased to note that Peel Developments, and its development partner, British Waterways, are now working in earnest to deliver Gloucester Quays at the earliest opportunity together with Gloucester City Council and the other stakeholders involved.

Policy CA.33 – Use of Upper Floors for Residential

Paragraph 9.3

0941 British Waterways South West	Support	Policy CA.33 - Upper Floors Residential	British Waterways supports this policy.
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Policy CA.36 – Housing Mix

Paragraphs 9.7 – 9.9

0171 Bovis Homes Limited	Object	Policy CA.36 - Housing Mix	<p>This is a very restrictive policy. The Council should not have the ability to determine the mix of housing on new development sites. This approach is not supported in national or regional planning policy. The mix of housing on new development sites should be market led in which housebuilders have an excellent understanding of the requirements.</p> <p>This policy also seems to be contrary to national and regional planning policy, in particular the requirement to make the most efficient use of land.</p> <p>We fail to see how the proposed policy relates to the overarching aims of national and regional policy and request that it is deleted.</p>
1353 Morley Fund Management Limited	Object	CA.36 - Housing Mix	<p>We object to the wording of Policy CA.36 and the requirement for the provision of family housing in residential development schemes within the Central Area.</p> <p>The policy as it stands does not define the phrase 'family housing' and therefore no indication is given by the document of the type of housing that Council wish to see provided in the Central Area.</p> <p>Whilst a redevelopment scheme could provide a mix of dwellings in terms of size and tenures, it is not realistic for policy CA.36 to assert the requirement that family housing is provided in all Central Area locations.</p> <p>It is not possible to provide houses within large scale, mixed-use, retail led, town centre</p>

			<p>redevelopment projects that include an element of residential use. We therefore object in principle to this policy and would wish to see the inclusion of a definition of 'family housing' as an amendment to the current first paragraph of the policy along the lines of:</p> <p>'Residential development schemes within the Central Area where deemed appropriate in terms of location and the development proposed, be required to provide an element of family housing as part of an overall mix of residential units'.</p>
<p>1441</p> <p>Duddington House Properties</p>	Object	CA.36 - Housing Mix	<p>We note that the policy has a target of 15 units or more for affordable housing provision. This threshold of 15 units for affordable housing is based on Core Policy 5 of the draft Core Strategy, which is currently in draft form and is not timetabled for adoption until March 2008.</p> <p>Additionally, whilst we recognise that an indicative target of 15 units or more is given in draft PPS3 'Housing' we would like to point out that this has document is still in draft form and does not represent adopted government policy.</p> <p>Current national guidance in relation to affordable housing is set out within Circular 6/98 which gives a target of housing developments of 25 or more dwellings or residential sites of 1 hectare or more, irrespective of the number of dwellings. The Circular indicates that if a Council wish to adopt a lower threshold then the lower threshold must be justified through the local plan process.</p>
<p><u>Policy CA.37 – Learning, Skills and Employment Initiative</u></p> <p><u>Paragraphs 9.10 – 9.16</u></p>			
<p>1353</p> <p>Morley Fund Management Limited</p>	Object	CA.37 - Learning/Skills Initiative	<p>We object to to this policy on the basis that it over-emphasises the requirement for major new development in the Central Area to contribute to the Learning, Skills and Employment Initiative. We consider that any financial contributions should be established through negotiations between the developer and the Council on the basis of site constraints, adverse costs, and other contributions to the local area to be made by the scheme. We therefore seek that Policy CA.37 is amended to read:</p> <p>'Financial contributions may be sought from major new development in the Central Area towards an employment brokerage service to be established through the Learning, Skills and Employment Initiative. Contributions will be made on the basis of negotiations between developers and the Council'.</p>
1395	Support	Paragraph 9.16	Sainsbury's Supermarkets, whilst supporting the general aims of policy CA.37 - Learning Skills and

Sainbury's Supermarkets Limited			<p>Employment Initiative, consider that the policy should be reworded, to better reflect Government guidance as set out in circular 05/2005.</p> <p>The policy should be reworded to state:</p> <p>Financial contributions will be sought from major new development in the central area towards an employment brokerage service to be established through the Learning, Skills and Employment Initiative.</p> <p>Such contributions shall be related to the proposed development and be reasonable in all respects as required by Government Guidance, as set out in Circular 05/2005.</p>
1397 South West of England Regional development Agency	Support	CA37 Learning and Skills Initiative	<p>The agency welcomes this policy. 'Spatial Implications - Place Matters' highlights the need to improve the skills base (basic and professional) and help the existing workforce to re-train in order to help attract businesses and increase wages in the City. This should include making best use of Gloucester's higher and further education facilities.</p>
<u>Policy CA.39 – Education and Training</u>			
<u>Paragraphs 9.20 – 9.22</u>			
1450 Gloucestershire County Council	Comment	CA.39 - Education and Training	<p>The County Council as Local Education Authority has responsibilities for the provision of education from 0-18 years. It is not clear whether this section and policy refers to training for those of post-statutory school age or all education facilities. No reference is made to the requirement for financial contributions towards education facilities being sought from all relevant and appropriate developments although this is referred to in on p120, para 10.10.</p> <p>Add (new) 9.23: "Contributions may be required towards education facilities including children's centres, primary school and secondary school levels from all relevant development proposals within the Central Area. The County Council's Business Management Directorate can provide further guidance and information." Add new paragraph to Policy CA39: "Contributions towards education facilities from 0-18 year olds may be required from all relevant development proposals within the Central Area."</p>
1353	Object	CA.39 -	We consider that policy CA.39 should place more emphasis on the requirement that education and

Morley Fund Management Limited		Education and Training	training facilities are only located in appropriate locations within the Central Area. As such, we recommend that the justification states that education and training facilities should only be sought provided they do not conflict with other policies in the LDF or proposals in the surrounding area.
1397 South West of England Regional Development Agency	Support	CA39 - Education and Training	The agency welcomes this policy. 'Spatial Implications - Place Matters' highlights the need to improve the skills base (basic and professional) and help the existing workforce to re-train in order to help attract businesses and increase wages in the City. This should include making best use of Gloucester's higher and further education facilities.
Policy CA.41 – Central Area Parking			
<u>Paragraphs 9.24 – 9.34</u>			
0200 The Theatres Trust	Comment	CA.41 - Parking	With regard to theatres in general, the economics of theatre are reliant on audiences being able to get to the venue by public transport and by car, being able to park their cars and bikes, and being able to get home safely after a show. Controlled Parking Zones around theatres that extend to 11pm at night have serious implications for their economic viability. We would strongly urge any planning policies concerned with parking provision (Policy CA41) to consider the presence of theatres in the locality. Theatres are unlike other forms of the night time economy - they attract families, young people, disabled patrons, and older people who can be discouraged to attend theatres if the costs of travelling and parking at the theatre make the price tag of the evening out too high. Where restrictive regimes do occur we would urge the planning authority to allow for special conditions that can provide free parking to theatre patrons.
1449 Gloucestershire County Council	Object	CA.41 - Central Area Parking	<ul style="list-style-type: none"> - We would wish to see 'at current levels' added to bullet point 1 to emphasise the need to maintain and not 'increase' the level of public car parking available. - We would wish to see bullet point 5 refer to 'replacement' car parking rather than 'new'. - We would recommend the addition of a sixth bullet point to this policy that deals with the issue of 'long-stay car parking' and incorporates the policy of providing new and replacement long-stay parking as Park and Ride rather than within the centre or edge of centre. - We would recommend the addition of a seventh bullet point to this policy that refers to and extends the Development Control Policies (Preferred Options Consultation Paper) at Appendix 2 on Private Residential and Non-Residential Parking Standards by highlighting the need to significantly constrain

			on-site parking if it can be provided without compromising road safety, traffic management or amenity.
1377 Gloucester Hospitals NHS Foundation Trust	Support	Policy CA.41 - Central Area Parking	The general thrust of this policy is supported. It is important that the points made in this policy are reflected in the site specific policy in the site allocations and commitments section, particularly point 4 of CA.41 which requires sites for new short stay car parks to be identified as part of major mixed-use development proposals.
<u>Policy CA.43 – Enhancing the Bus and Rail Interchange</u>			
<u>Paragraphs 9.37 – 9.38</u>			
1353 Morley Fund Management Limited	Object	CA.43 - Enhancing Bus/Rail Interchange	<p>We object that policy CA.43 considers the bus and rail interchange in isolation to the wider developments proposed for the Kings Square area. The redevelopment of the bus and rail interchange should form part of a comprehensive redevelopment package to ensure that the redevelopment of Kings Square and the Bus Station is viewed in a holistic manner rather than as separate developments.</p> <p>We therefore recommend that the first paragraph within policy CA.43 is amended to read:</p> <p>'The City Council will seek the enhancement of the bus and rail interchange in conjunction with the redevelopment of the existing bus station and King's Square'.</p>
<u>Policy CA.44 – Pedestrian and Cycle Linkages</u>			
<u>Paragraphs 9.39 – 9.41</u>			
0941 British Waterways South West	Support	Policy CA.44 - Pedestrian/Cycle Links	British Waterways supports policy CA.44 in relation to the provision of new cycle access to the River Severn and the Gloucester Sharpness Canal.
1353	Object	CA.44 - Pedestrian and	We object to policy CA.44 as we feel that further clarification should be provided in relation to the requirement in the current second paragraph that where appropriate, new development will be

Morley Fund Management Limited		Cycle Linkages	<p>required to provide or contribute towards the provision of, amongst other things, new bridges.</p> <p>We feel that this paragraph should omit 'new bridges' and instead require that new development provides or contributes towards the provision of new and/or enhanced pedestrian and cycle infrastructure works. This would provide the Council with a negotiating tool to secure such infrastructure works such as new bridges, however, does not deter new development proposals from coming forward by requiring that they fund the cost of new bridges without allowing for negotiations.</p> <p>We therefore recommend that the second paragraph is reworded to read along the lines of:</p> <p>'Where appropriate, new development will be required to provide or contribute towards the provision of new and/or enhanced pedestrian and cycle infrastructure works. This could include pedestrian and cycle linkages and/or new bridges, and will be subject to negotiations between the developer and the Council'.</p>
1502 Morley Pooled Pensions Limited	Object	CA.44 - Pedestrian and Cycle Linkages	<p>We object to policy CA.44 as we feel that further clarification should be provided in relation to the requirement in the current second paragraph that where appropriate, new development will be required to provide or contribute towards the provision of, amongst other things, new bridges.</p> <p>We feel that this paragraph should omit 'mew bridges' and instead should require that new development provides or contributes towards the provision of new and/or enhanced pedestrian and cycle infrastructure works. This would provide the Council with a negotiating tool to secure such infrastructure works as new bridges, however, does not deter new development proposals from coming forward by requiring that they fund the cost of new bridges without allowing for negotiations.</p> <p>We therefore recommend that the second paragraph is reworded to read along the lines of:</p> <p>'Where appropriate, new development will be required to provide or contribute towards the provision of new, and/or enhanced pedestrian and cycle infrastructure works. This could include pedestrian and cycle linkages and/or new bridges, however this will be subject to negotiations between the developer and the Council'.</p>
<p><u>Policy CA.45 – Downgrading the Quay</u></p> <p><u>Paragraphs 9.42 – 9.43</u></p>			
0941	Support	Policy CA.45 - Downgrading	Under Policy CA.45, British Waterways supports the proposal to seek financial contributions towards the improvement of the riverside walkway.

British Waterways South West		the Quay	
1359 Countrywide Farmers	Object	Policy CA.45 - Downgrading the Quay	Policy CA.45 deals with the proposal for "downgrading The Quay." It is explained that the City Council supports the downgrading of The Quay to allow for additional pedestrian movement and the comprehensive redevelopment of the Quayside area. The Countrywide Store takes access from The Quay and this vehicular route forms its main profile to existing and potential customers. The unit is at a prominent location on the road system and is easily accessed. For these reasons, our client opposes any wholesale proposal to downgrade. The Quay such that its access and profile would be compromised. Our client does not challenge the City Council's aspirations to improve pedestrian movement but this can be delivered without also putting at risk our client's business and making it more difficult for its customers to access the store.
1444 Gloucestershire County Council	Comment	CA.45 - Downgrading the Quay	It should be made clear that the potential downgrading of The Quay will be dependant upon approval from the County Council as Highway Authority. Any such proposal will need to be analysed and modeled before County Council support is given.
1449 Gloucestershire County Council	Comment	CA.45 - Downgrading the Quay	We would recommend that this policy makes it clear that the potential for downgrading the Quay will be investigated with the Highway Authority utilising their modelling software to predict the impact of such a reduction of traffic capacity on the network.
1467 Mr Paul Pibworth	Comment	The Quay	The riverside should be developed into attractive feature as has been achieved in other towns and cities.

Policy CA.46 – Improving Health of Residents in the Central Area

Paragraphs 9.45 – 9.46

0041 West Gloucestershire Primary Care	Comment	Paragraph 9.44	What measure of health od being used_ Is it self reported illness_ Life expectancy at birth_ It is not stated what 'average' is referred to - is it national, county_
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Trust			
0041 West Gloucestershire Primary Care Trust	Comment	Paragraph 9.45	The statement here refers mainly to physical activity and healthcare however what about creating supportive environments, in particular Smoke Free Gloucestershire?
1377 Gloucester Hospitals NHS Foundation Trust	Object	Policy CA.46 - Improving Health of Res	This policy states that the Gloscat Media site will be subject to a financial contribution to a medical centre on site. All large housing developments will have a significant impact on healthcare provision in the area and therefore the policy should contain a more general statement that, where appropriate, new residential development should make financial contributions towards healthcare provision.
<u>Policy CA.48 – Reuse of Historic Buildings including Buildings at Risk</u>			
<u>Paragraphs 9.59 – 9.60</u>			
1353 Morley Fund Management Limited	Object	CA.48 - Reuse of Historic Buildings	<p>We object to policy CA.48 as we feel that it over-emphasises the need to re-use historic buildings including buildings at risk without paying regard to the appropriateness of the this reuse. We also request that to avoid ambiguity the policy clarifies what the Council considers to be a historic building.</p> <p>We consider that this policy should include the caveat 'where appropriate' or 'where suitable' as there may be buildings that are wholly unsuitable and/or inappropriate for re-use within the Central Area and in attempting to save them could inhibit the regeneration of certain areas of the Central Area. We recommend that the policy is amended to read along the lines of:</p> <p>'The City Council will positively support the re-use of historic buildings in the Central Area that are deemed appropriate and suitable for appropriate new uses including their use as a focal point within new development proposals.</p> <p>The City Council will also encourage, where appropriate, the repair and maintenance of listed buildings and scheduled ancient monuments in poor and very bad condition within the Central Area (known as Buildings at Risk)...</p>

<p>1502</p> <p>Morley Pooled Pensions Limited</p>	<p>Object</p>	<p>CA.48 - Reuse of Historic Buildings</p>	<p>We object to Policy CA.48 as we feel that it emphasises the need to re-use historic buildings including buildings and risk with paying regard to the appropriateness of this re-use. We also request that to avoid ambiguity the policy clarifies what the Council considers to be a historic building.</p> <p>We consider that this policy should include the caveat 'where appropriate' or 'where suitable' as there may be buildings that are wholly unsuitable and/or inappropriate for re-use within the Central Area and in attempting to save them could inhibit the regeneration of certain areas of the Central Area. We recommend that the policy is amended to read along the lines of:</p> <p>'The City Council will positively support the re-use of historic buildings in the Central Area that are deemed appropriate and suitable for appropriate new uses including their use as a focal point within new development proposals.</p> <p>The City Council will also encourage, where appropriate, the repair and maintenance of listed buildings and scheduled ancient monuments in poor and very bad condition within the Central Area (known as Buildings at Risk)...</p>
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Policy CA.49 – Late Night Uses Inside the Central Area

Paragraphs 9.61 – 9.65

<p>0200</p> <p>The Theatres Trust</p>	<p>Comment</p>	<p>CA.49 - Late Night Uses</p>	<p>On the subject of funding, it is important that the need for developer contributions for cultural facilities is identified and although planning obligations contributions are mentioned at Policy CA 49 we feel further explanation is required, and you may want to develop this in the form of a supplementary planning document. The document should develop detailed policies setting out what achievements are expected from section 106 deals. Investing time and resources in such a document will set down clearly what is required of the developer and other funding partners. We recommend Securing Community Benefits through the Planning Process available at PlanningResource.co.uk.</p>
<p>1353</p> <p>Morley Fund Management Limited</p>	<p>Object</p>	<p>CA.49 - Late Night Uses - Central Area</p>	<p>We understand that late night uses should be controlled within the Central Area, however, we feel that Policy CA.49 is overly restrictive about the types of uses that should be located within the Central Area. We wish to see policy CA.49 amended to enable the Council to consider the appropriateness of late night uses in relation to other development proposals and uses within the wider locality and therefore suggest that the current first paragraph is reworded to read along the lines of:</p> <p>'Planning permission will be granted for late night uses in appropriate locations in the Central Area that support the Evening Economy Strategy. Proposals will be assessed according to uses within the wider locality and the uses contained within other emerging development proposals'.</p>

Policy CA.50 – New Hotel Development in the Central Area

Paragraphs 9.66 – 9.68

0941 British Waterways South West	Support	Policy CA.50 - Hotel Development	British Waterways supports this policy as it believes that there is a major opportunity for hotel development adjacent to the Docks or Canal.
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Policy CA.52 – Cultural Facilities

Paragraphs 9.73 – 9.74

0200 The Theatres Trust	Support	CA.52 - Multi-Purpose Venue	We support Policy CA19 and Policy CA52 which support new theatre venues, however, we would remind you that theatres are very complex buildings technically and do need to be very carefully planned both inside and out. We would therefore strongly recommend that an objective opinion should be sought from a Theatre Consultant and that this is integrated within the policy text.
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Policy CA.53 – Community Provision

Paragraphs 9.75 – 9.79

1450 Gloucestershire County Council	Support	CA.53 - Community Provision	<p>Community provision includes functions for which the County Council is responsible including Youth, Care and Nursing Homes for the elderly, facilities for the Disabled, Libraries and Fire & Rescue. Appropriate contributions will be required from all relevant development towards these facilities to ensure that suitable infrastructure is available to meet the new community needs.</p> <p>Add new 9.80: "Community facilities for which the County Council is responsible include Youth, Elderly, Disabled, Libraries and Fire & Rescue. Appropriate contributions may be required towards these facilities from all relevant development proposals within the Central Area where justified and necessary. The County Council's Business Management Directorate can provide further information and advice. "Amend 3rd para, Policy CA53: "Appropriate contributions may be required towards all community facilities from relevant development proposals within the Central Area."</p>
1353	Object	CA.53 -	We feel that this policy is overly prescriptive and does not provide for negotiations between the

Morley Fund Management Limited		Community Provision	<p>developer and the Council in relation to financial contributions to be made by major development proposals for new community projects. To provide a greater flexibility and to allow for negotiations between developers and the Council in relation to community provision we seek that the current third paragraph is amended to read along the lines of:</p> <p>'Where appropriate, financial contributions towards new community facilities will be sought from major development proposals within the Central Area'</p>
<u>Policy CA.55 – Improving the Quality of the Public Realm</u>			
<u>Paragraphs 9.83 – 9.85</u>			
1397 South West of England Regional Development Agency	Support	CA55 - Improving the Public Realm	The AAP's commitment to improving the quality of the area's public realm is supported as this will help to enhance the image of Gloucester particularly through its strengths regarding the heritage environment as advocated in 'Place Matters'.
<u>Implementation</u>			
<u>Paragraphs 10.1 – 10.17</u>			
1450 Gloucestershire County Council	Support	Paragraph 10.10	<p>Support the inclusion of the County Council as a provider of infrastructure. However further clarification should be provided to ensure that all prospective developers and landowners are aware of the spread of responsibility of the County Council.</p> <p>Amend 10.10: "We will also work with the County Council and Help Providers to ensure that all appropriate infrastructure requirements of new development for education (at children's centre, primary and secondary levels), Community Services (including youth, facilities for the Elderly, Disabled, Libraries and Fire and Rescue) and healthcare are recorded and taken into account in the development process, including supporting these bodies in securing relevant contributions towards this infrastructure."</p>

Proposals Map / Illustrative Material

<p>0445</p> <p>Environment Agency</p>	<p>Object</p>	<p>Illustrative Material</p>	<p>In accordance with Regulation 26, at the preferred options stage LPA's should prepare maps to help identify various sites and areas relating to the policies. We do not consider this has been adequately achieved.</p> <p>For example, with regard to Priority Area 7 (The Canal Corridor), the area has been split into six policies - however the appendix only includes a map of the whole canal corridor area. It would be useful for the map to be split into the sub areas for site identification.</p> <p>Policy CA.30 refers to 'as shown on the proposals map'. With no 'proposals map', a site location plan should be included to ensure those consulted know exactly where the designation is.</p>
<p>1449</p> <p>Gloucestershire County Council</p>	<p>Object</p>	<p>Proposals Map</p>	<p>Policy CA.17 'Bus Priority Routes' are not identified on the Proposals Maps, or included in the legend(s).</p> <p>Policy CA.1 'City Centre Boundary' boundaries, of the City Centre in particular, are difficult to distinguish.</p>

Objections Sites

<p>1701</p> <p>Cooperative Group Property Division</p>	<p>Comment</p>	<p>Objection Site – 253 – 257 Bristol Road</p>	<p>Cooperative Group Property Division own land at 253 - 257 Bristol Road (as shown on the attached plan). The site is located on the frontage of Bristol Road at a place where the Area Action Plan envisages significant changes.</p> <p>The Adjacent sites are identified for redevelopment in the short and longer term. Removal of the road bridge and improvements to the pedestrian and cycle access into the city are proposed which would make the site even more prominent.</p> <p>Although it is not essential to include the site within the comprehensive proposals for either CA.24 or CA25 the site could be redeveloped for alternative non-employment uses and act as part of the regeneration of the area in conjunction with these two proposals.</p> <p>Redevelopment of the site with a high quality development would comply with policy CA.40 and potentially benefit the environmental qualities of this gateway site.</p>
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			We therefore request that the Area Action Plan is amended to include reference to the potential redevelopment of this site for either employment, commercial, or mixed-use including residential in accordance with policy CA.40.
<u>Sustainability Appraisal</u>			
0494 Government Office for the South West	Object	Sustainability Appraisal	Whilst we do not comment in detail on the Sustainability Appraisal we are unclear as to whether any of the alternative options arising from the Issues and Options document were considered as part of the Sustainability Appraisal process, for example developing Blackfriars as the main focus for new retail development. Without knowing how alternative policies/site proposals compared with the Council's preferred option it is difficult to assess the appropriateness of your conclusions.
<u>Tests of Soundness</u>			
0494 Government Office for the South West	Object	TOS - Test 1	<p>Your draft LDS states that this AAP will 'identify the distribution of land uses within the area covered by the GHURC and their inter-relationships including specific site allocations, however this is not achieved by the document itself and could therefore be at risk of being found unsound in this respect.</p> <p>The 'Context' section of the AAP refers to the URC and identifies a number of specific targets and outputs for the area (Para 2.12) which the document seeks to deliver. However, a large proportion of these targets will be delivered by schemes that are not referred to in the document - for example, Bakers Quay. Whilst we appreciate that you may consider it inappropriate to have a specific site allocation policy relating to these sites (because planning consent has already been granted), the AAP should still explain the delivery mechanisms for ensuring for ensuring that these planning permissions are delivered. It should set out key obstacles for delivery and options for how these may be overcome, partnership arrangements and lead roles, timescales for various elements of the permissions, any phasing arrangements necessary - for example details of when S106 will be required to deliver key infrastructure, when and by whom infrastructure will be delivered, if there are any contingencies/risk management if the proposed schemes don't come forward (with links to the AMR and housing trajectory) and what the impacts of the planning consents are on other policies and proposals within the DPD and wider City area.</p>
0494 Government Office for the South West	Comment	TOS - Test III	Please refer to comments made to the Sustainability Appraisal.

<p>0494</p> <p>Government Office for the South West</p>	<p>Object</p>	<p>TOS - Test IV</p>	<p>PPS 12 sets out the elements of provision that spatial plans should include and we consider that your plan may be at risk of being found unsound unless further work is carried out before progressing to the next stage.</p> <p>For example, PPS 12 refers to implementation, monitoring and phasing provision - the strategic objectives for this DPD include a section on 'how' but this does not give details as to who will lead on these, how they will be monitored and what the key milestones are, or by when the objectives will be met. Many of the site specific policies also lack this information and read more like Local Plan policies than the delivery of agreed targets.</p> <p>The plan should also make clearer how the plan has taken account of other service provider requirements e.g. agencies providing services in the area including their future plans. What for example are the likely requirements within the plan period for religious, health, and educational facilities? Based on the additional 3,000 homes being proposed in the area, what sites have been considered to meet their needs? Are there any hospital/school closures or expansions planned?</p> <p>It should also show how it relates to other strategies in more detail. For example, what does the LTP say about Park and Float facilities, how will they be funded, and when are they required to deliver LTP targets_</p> <p>Area Action Plans for large urban extensions or areas of significant change, such as those being proposed for Gloucester's regeneration could offer a good opportunity to integrate renewable energy and waste management facilities which should be explored as part of this document preparation.</p> <p>In line with PPS6 (paragraphs 2.5, 2.6 and 2.16) did you consider including Bakers Quay and Blackfriars Quay within the Primary Shopping Area or City Centre Boundary?</p>
<p>0494</p> <p>Government Office for the South West</p>	<p>Object</p>	<p>TOS - Test VI</p>	<p>There appears to have been a 'swapping' of policies from the SAD Issues and Options into this AAP. For example, Policy CA.14 - Landscape Conservation Areas was originally in the former plan and yet at preferred options stage appears in the AAP with no justification or explanation for doing so. It also states in paragraph 7.85 that views were invited on this policy at issues and options - but it clearly wasn't as part of this document.</p> <p>There are many policies which appear in this AAP that replicate policy provision elsewhere in the LDF or appear inappropriate within the context of this document - for example policies CA.7 - CA.14.</p> <p>Policy CA.49 appears contrary to the DC policy on night uses which doesn't refer to the issue of</p>

			unacceptable concentration of uses - is there a clear justification for this. If so, this should be made explicit.
0494 Government Office for the South West	Comment	TOS - Test VII	There appears to be a lack of clear justification for the options chosen, particularly given that many of the policies contained in the DPD are not covered by the options summary contained in the Appendix to the document. Some of the consultation responses to the issues and options stage appear to have selected preferred options without adequate justification for example the Blackfriars option. Without this information it is difficult to assess how conclusions have been reached.
0494 Government Office for the South West	Comment	TOS - Test VIII	As stated under test IV, the document should refer much more to implementation, monitoring and phasing - including key milestones. This information should be provided on key sites that contribute to the targets identified in the document. It should make clear who is intending to implement each policy (including evidence of commitment from relevant organisations) and how key objectives will be achieved.
<u>Public Exhibition Comments</u>			
1660 Public Exhibition Comments	Various	Various	<p>With all of the new development going on we must ensure they all cycleways are of high quality, dedicated and well laid out.</p> <p>Support a new theatre and hotel in the City Centre.</p> <p>Support anything that gives people something to do in the City Centre.</p> <p>Support all allocations for new retail.</p> <p>The indoor market should not be demolished. Keep it where it is.</p> <p>Support the idea of creating a large area of open space around the Greyfriars monument.</p> <p>Need to balance the provision of new flats and employment with sufficient attractions and things to do.</p> <p>Car Park on Kings House is never used - possibility of linking it to the bus station development_</p> <p>Need improved signage between attractions and to emphasise the heritage more fully.</p> <p>Support the new stadium on the railway triangle - more parking will be needed however.</p>

			<p>Cost of public transport prohibitive.</p> <p>Spa lights - no crossing facilities.</p> <p>High kerbs across from Courts.</p> <p>Strongly support the community stadium on the railway triangle.</p> <p>Toilets are closed at the bus station - public conveniences need sorting.</p> <p>Object to the Gloucestershire Parkway Railway Station proposal.</p> <p>Concern regarding the loss of car parking at Hampden Way.</p>
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