

Planning application 21/01323/FUL representation

Received: 20/02/22 and 24/02/22

Comment:

I'd like to make the following comments with regards to the University of Gloucestershire's application for the proposed city campus at the former Debenhams building - ref 21/01323/FUL

I welcome the Universities proposals and consider it to have the potential to be one of the most positive developments to take place in the city for many years.

As far as the physical proposals for the building are concerned:

I'd like to see more of an active frontage to King's Square and feel that the simplest and most practical method of achieving this would be the installation bi-folding doors opening up from the cafe to the square and an abundance of outdoor tables for the use of customers of the cafe. I notice that outdoor tables are displayed in the latest video clip, but there appears to be no mention within the planning application.

I recall that the views from the former cafe on the top floor overlooking the square and well-beyond were particularly impressive but it appears that they will be largely wasted.

Couldn't more be made of these views, perhaps by locating staff working or breakout space there to improve the working environment of employees or locate larger class rooms there?

I seem to remember reading a suggestion from the conservation officer suggesting that the existing windows overlooking the Oxbode should be retained and secondary double glazing installed.

I view that this would not only be impractical and undesirable it would be a retrograde step. Surely replacing the windows with new/current spec double glazed windows which would appear identical (from the outside) would be a far more desirable outcome?

Other points:

I understand that Graduation ceremonies for Oxtalls students have been switched to Cheltenham Racecourse in recent years; this is to the detriment of city centre traders.

Would it be possible (and desirable) to apply a planning condition that all such future ceremonies for students studying at the new city campus take place at Gloucester Cathedral or another location within the city?

During the consultation process for the expansion of the Oxtalls campus (the new business school),

we were given the impression that the city's economy would benefit considerably from the greater number of students (a figure of 2000 was often quoted) based in the city.

However, I understand that the majority of students currently studying at Oxtalls now live in Cheltenham.

While I understand that UOG cannot instruct students where to live, could a condition not be put in that UOG make all reasonable efforts to encourage (and where practical assist) students to reside within the city- preferably in the central area within walking distance of the new campus?

This would also add to the environmental credentials of the development, minimising the carbon footprint and helping sustainability.

Could an appropriate condition not be based on these grounds - especially when taking into account that UOG state that "sustainability as a key enabler to the vision"?

The annual Freshers Fayre takes place at Park Campus Cheltenham.

Once the new city campus is fully open (i.e. after completion of phase 2), could UOG alternate the venue of the event on an alternative basis between Park Campus and the City campus, including King's Square and the Oxbode?

The majority of student union events are currently based in Cheltenham.

Could UOG, the Student Union, the City Council/Visit Gloucester and Gloucester Bid etc. work together to promote an increased number of events in the City with the specific aim of evening up (or levelling up) the number of events up between the city and Cheltenham?

As UOG are set to benefit from a substantial amount of "levelling up funding" from central Government, would it not be appropriate for planning conditions to be applied for the above points?

If it's not too late I'd just like to make some brief additions to my previous comments:

It could perhaps be argued that the most effective test of the new City Campus economic impact on the city's economy (and hence degree of levelling up) would be the number/percentage of the students that live in the city during their time at the University.

The Universities own economic impact statement (Biggar Economics, June 2021) contains an estimate that when the new City Campus is fully operational 43% of the Universities 14,565 students will live in Gloucester.

To facilitate this, could an action plan be put in place, a target set for the number of the students housed within the city boundaries and measured and reported on annual basis? (and included in an appropriate planning condition)

The Universities Estates Strategy document (2017 to 2022) stated that approx. 1000sqm of office space is leased at Delta Place, Cheltenham to accommodate Professional Department staff, with the lease expected to be extended to 2023.

It then states that "Work is now required to establish a longer term strategy to replace Delta House beyond this timeframe".

The planning application indicates that approx. 1500sqm of floorspace of the former Debenhams building is effectively not included in the campus plans.

Could the staff be accommodated in this space? This could potentially save UOG money by avoiding leasing space from third parties and also contribute towards the levelling up effect.

Could the Tourist Information Centre be located in the building, either within the University or Public Library, perhaps with students helping to staff it?

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Received: 03/02/22

Comment:

I wanted to express my full support to the application to convert the former Debenhams store into a city centre university location. I firmly believe Gloucester needs to reinvent the city centre and give people a reason to visit. I also believe there is a need to offer opportunity and knowledge equally to all and having the facility in the centre makes it accessible to everyone and is likely to drive new interest in skills development which will impact our future prospects as a centre for innovation. I can imagine a series of events in the centre either offered by the University or scheduled by third parties who utilize spaces to make our city an attractive events venue and place to visit. We still don't have a decent central events facility in Gloucester and it is exciting that this venue will be able to offer spaces for exhibitions and conferences, especially during summer months.

Locating the public library and health clinic facilities will drive people into the city and generate revenue and sustainability for small businesses who are being starved of income because of the rise in internet shopping. The synergy between the re-purposing of this big old building and the new developments by Kings Square are significant and exciting for everyone who lives in Gloucester and I for one am glad the building is not going to become flats or vacant shopping units. We should be thankful to the University for investing into our City and should be falling over ourselves to offer full support.

I do accept there will need to be an adequate travel plan to avoid congestion in the centre, but I believe the government's target for more green travel are essential from an environment sustainability perspective and I would be keen to see more cycle routes and green travel options into the city - the growth in use of these (fueled by University staff and students) will enable the services to become increasingly viable and could contribute to wider plans to promote the city as a green and sustainable exemplar.

Planning application 21/01323/FUL representation

Received: 05/02/22

Comment:

I have lived in Gloucester since 1997 and worked in the arts in Cheltenham and elsewhere, since 1986. Please consider the lack of a decent art gallery and performing art space in our great city. Somewhere the size of Gloucester, with its lively and engaged, multi-cultural community deserves better arts provision. Please consider part of this vast building for flexible use for the visual and the performing arts.

Planning application 21/01323/FUL representation

Received: 03/02/22

Comment:

We are writing to formally record the support of Stagecoach West for the repurposing of the former Debenhams department store by the University of Gloucestershire to accommodate multiple-functions, including teaching, research and library space, with additional ancillary and facilities including several that will ultimately directly serve the wider community and public.

The building clearly occupies a strategic position in the town centre and relates directly to wider regeneration at its northern end, which is now well underway. The complementarity of the proposals with the City's redevelopment at "The Forum" (formerly Kings Quarter) which seeks to provide flexible space to support knowledge based businesses and a hotel among other things, is especially strong.

We do not underestimate the value of the University's presence, as a key foundation stone of the County's economy and social development. The University has a strong track record of growth, and it clearly wishes this to continue in support of the immediate and longer term needs of society and the economy both locally and beyond.

In terms of planning policy, the University proposals represents in effect a *sui generis* use, that is closest to a combination of "public assembly" and education. Many of the activities proposed for the site such as libraries, represent public or semi-public facilities. Thus, although not falling neatly within the new "E" use class that has been established by the Government in large measure to assist the expeditious evolution and transition of town centres to accommodate a wider range of activities, and in particular to help address the current over-supply of retail floorspace through appropriate re-purposing, we agree wholeheartedly with the reasoning expressed by the applicant in the Planning Statement.

At the point that the Joint Core Strategy was adopted, nearly 5 years ago, it was already accepted that policy related to town centres needed to be urgently re-addressed. Even so, the accelerated changes that have occurred over the last three years, which COVID has wrought, could never have been anticipated by policy. However there is little doubt that the nature, size and format of the Debenhams building, which so strongly reflects a bygone era meant that it would have continued to struggle to maintain relevance as a retailing asset, with little commercial basis on which to justify and support the kinds of heavy investment needed to address these issues.

However, the sudden loss of the store, while disconcerting, has, it appears, serendipitously created an outstanding opportunity for the City and one that we are concerned is capitalised upon without delay.

At the most fundamental level, it is entirely right that the University should seek to occupy a city centre location to meet its growth needs. This establishes it at the centre of the community, in a way that makes the institution and its activities much more visible and accessible to all. The nature and site of the building lends itself perfectly to this. As the relative importance of retail to town centre functions as central places, to continues to reduce, a knowledge based economy continues to demand community and collaboration, if anything more so. The city centre is a natural focus for the development of the University's activities, as a place where it continues to be easiest for all Gloucester's citizens to converge, whatever their role and interest in the University.

The building will no doubt facilitate much more effective outreach and access to parts of the community that generally have lower levels of participation in higher education. Given the demographic profile of the City, this is a particularly important benefit of the proposals.

By its nature, and scale of operations, the University is one of the largest generators of personal trips within the City and wider Joint Core Strategy area, including at peak times. It is vital that as many trips as possible are picked up by competitive and relevant sustainable travel opportunities. This includes associated trips directly related to courses and initial professional training, and further professional development. Importantly, it is understood that a significant amount of the teaching activity

on the proposed site will relate to health and social care, requiring placements in settings across the community. A site that allows a huge number of such settings to be directly and conveniently reached by walking cycling and public transport, is evidently hugely advantageous.

Gloucester City Centre is, obviously, by far the most accessible place in the County by all forms of sustainable mobility, looking across a wide range of geographical scales. The northern end of the centre is directly adjacent to the rail station and bus hub, both of which are within about 400m of the site. The Clarence Street terminal used by most city bus routes is even closer. The Transport Assessment makes evident the breadth and depth of timetable coverage of the network, which does not come close to being matched anywhere else in the County, including anywhere in Cheltenham.

The TA does not go this far, but comparison between Gloucester and Cheltenham in terms of the number of settlements served by direct bus routes, journey times, and service frequencies would highlight the outstanding benefits of a Gloucester City Centre location, over any other site option. Not only that, but access to Gloucester from the most peripheral and deprived parts of the County is especially good. This includes most of the Forest of Dean, and parts of Stroud.

Nor does the TA highlight that Gloucester station is available at close quarters. This contrasts strongly with Cheltenham town centre, the station is out-of-town and greatly off-set from the focus of bus operations. The Gloucester City Centre campus thus uniquely benefits not only from an exceptionally high level of bus and coach accessibility, but a full range of rail connections in four directions: towards Birmingham, Bristol, Cardiff and Swindon (and thereafter London). The site will allow the very ready ability of the academic community to convene and disperse, whether for larger-scale conferences or much smaller and less formal symposia and meetings, without the need for the car. In fact, the Campus will be among one of the most easily accessed by rail of any in the UK.

There may be some concerns that the capacity of the facility will stretch the capacity of public transport services, especially at the start of the teaching day when the largest numbers of students can be expected to converge on the Campus.

We are happy to assure all stakeholders, including the applicant, that we do not see this being a problem, for the following reasons:

- There is a large increase in student accommodation planned in Gloucester City Centre, with Blackfriars Phase 2 currently under construction adding 194 student bed spaces to the 295 provided in phase 1: nearly 500 in total.
- Other existing student accommodation, such as 200 spaces at Oxstalls is well within cycling and even walking distance.
- Over the period that ensues following consent, to the completion of the final phase, the evolution of the University is likely to lead to further investment in purpose-built student accommodation in and close to the City Centre
- Stagecoach operates very frequent double deck services between Gloucester and most of the University's other facilities including at Oxstalls and in Cheltenham. Services 94/94X are anticipated to be restored to run every 15 minutes each, and service 10 every 10 minutes. Even prior to COVID these services, accommodating up to 72 passengers seated per bus, were running far from completely full.
- The start of the teaching day at 0915 means the peak is largely offset from the main office, school and college flows in the network.
- There seems little doubt that to the extent that peaks with office related travel overlap, there will be a significant and permanent reduction of demand from this source.

We would also stress that the rolling timetable of starts and finishes of teaching sessions in particular that is highlighted in the TA, means that demands on all forms of transport network will to a considerable extent be spread over the day. From our perspective this is ideal and very welcome, as the development is likely to provide some meaningful new off-peak demands, especially in the late morning, which we are well capable of accommodating.

Stagecoach has collaborated closely with the University of Gloucestershire for many years to ensure the needs for the student community in particular are well catered-for. The nature of our arrangements has evolved, in step with the University, as the disposition of teaching and accommodation facilities has changed, and the institution has grown. We have already shifted the emphasis of our strategy away from a "University network" standing alongside the wider service offer, to an enhancement of a wider variety of services to meet the needs of the institution, as the need for regular inter-Campus travel has reduced. The current proposals represent a major step forward in both consolidating University activity while expanding the scale of the

institution. We will continue to collaborate closely with the University to ensure that service optimally meet travel needs and that pricing is very attractive.

The increased relevance of the bus offer for University staff will be a particular area of future focus, given the sheer range of bus routes feeding the site, and the lack of dedicated parking provision, which we agree that with the exception of disabled provision would be unnecessary and inappropriate. In line with the approach we have taken with the largest employers, we anticipate redoubling our focus on marketing and distributing competitively priced travel passes to staff, as well as to students. We are confident that the mode shares anticipated for staff bus travel are well achievable and in practice could be exceeded.

From the foregoing, it will be seen that there are a real number of exceptional and positive transport considerations directly material to the planning balance that arise from the University of Gloucestershire proposals for the former Debenhams store. Direct and explicit Local Plan policy precisely supporting the site's regeneration in this manner could not reasonably be anticipated, but it is evident that the proposals align very well with the policies in the National Planning Policy Framework, read as a whole, as well as with the broad thrust of adopted local policy. As a site to accommodate existing and future University activities, it is almost inconceivable that a more appropriate one could be found, certainly having regard to the opportunities for sustainable modes that this building offers.

Furthermore, we do not see any material harms arising that would justify this proposal being resisted by the Council.

We are therefore pleased to lend our wholehearted support to the proposals.