



# Gloucester City Council

## Planning Policy Sub Committee

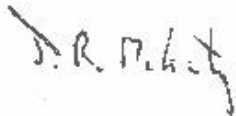
**Meeting: Monday, 4th September 2017 at 6.00 pm in The Civic Suite,  
North Warehouse, The Docks, Gloucester, GL1 2EP**

<b>Membership:</b>	Cllrs. Taylor (Chair), Lewis (Vice-Chair), Lugg, D. Brown and Dee
<b>Contact:</b>	Tony Wisdom Democratic Services Officer 01452 396158 anthony.wisdom@gloucester.gov.uk

### AGENDA

<b>1.</b>	<b>APOLOGIES</b>  To receive any apologies for absence.
<b>2.</b>	<b>DECLARATIONS OF INTEREST</b>  To receive from Members, declarations of the existence of any disclosable pecuniary, or non-pecuniary, interests and the nature of those interests in relation to any agenda item. Please see Agenda Notes.
<b>3.</b>	<b>PUBLIC QUESTION TIME</b>  To receive any questions from members of the public provided that a question does not relate to: <ul style="list-style-type: none"><li>• Matters which are the subject of current or pending legal proceedings, or</li><li>• Matters relating to employees or former employees of the Council or comments in respect of individual Council Officers</li></ul>
<b>4.</b>	<b>PETITIONS AND DEPUTATIONS</b>  To receive any petitions and deputations provided that no petition or deputation is in relation to: <ul style="list-style-type: none"><li>• Matters relating to individual Council Officers, or</li><li>• Matters relating to current or pending legal proceedings</li></ul>
<b>5.</b>	<b>CITY PLAN CONSULTATION RESPONSE REPORT (Pages 5 - 74)</b>  To consider the report of the Head of Planning which provides Members with a summary of comments received from the Draft City Plan consultation and the responses made to those comments.
<b>6.</b>	<b>SHOP FRONTS, SHUTTERS AND SIGNAGE - DESIGN GUIDELINES FOR GLOUCESTER (Pages 75 - 120)</b>

	To consider the report of the Head of Planning which informs Members on the outcome of the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester consultation undertaken for a 6 week period from the 21st November 2016 to 16th January 2017.
7.	<b>GLOUCESTER PUBLIC REALM STRATEGY</b> (Pages 121 - 190)  To consider the report of the Head of Planning which invites the Sub-Committee to recommend to Council that the Strategy be adopted as a Supplementary Planning Document.
8.	<b>DATE OF NEXT MEETING</b>  Thursday, 16 <sup>th</sup> November 2017 at 6.00pm (to be confirmed).



**Jon McGinty**  
Managing Director

**Date of Publication: Thursday 24<sup>th</sup> August 2017**

## NOTES

### Disclosable Pecuniary Interests

The duties to register, disclose and not to participate in respect of any matter in which a member has a Disclosable Pecuniary Interest are set out in Chapter 7 of the Localism Act 2011.

Disclosable pecuniary interests are defined in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 as follows –

<u>Interest</u>	<u>Prescribed description</u>
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the Council) made or provided within the previous 12 months (up to and including the date of notification of the interest) in respect of any expenses incurred by you carrying out duties as a member, or towards your election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between you, your spouse or civil partner or person with whom you are living as a spouse or civil partner (or a body in which you or they have a beneficial interest) and the Council (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged
Land	Any beneficial interest in land which is within the Council's area.  For this purpose "land" includes an easement, servitude, interest or right in or over land which does not carry with it a right for you, your spouse, civil partner or person with whom you are living as a spouse or civil partner (alone or jointly with another) to occupy the land or to receive income.
Licences	Any licence (alone or jointly with others) to occupy land in the Council's area for a month or longer.
Corporate tenancies	Any tenancy where (to your knowledge) – (a) the landlord is the Council; and (b) the tenant is a body in which you, your spouse or civil partner or a person you are living with as a spouse or civil partner has a beneficial interest
Securities	Any beneficial interest in securities of a body where – (a) that body (to your knowledge) has a place of business or land in the Council's area and (b) either – i. The total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or ii. If the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, your spouse or civil partner or person with

whom you are living as a spouse or civil partner has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

For this purpose, “securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

NOTE: the requirements in respect of the registration and disclosure of Disclosable Pecuniary Interests and withdrawing from participating in respect of any matter where you have a Disclosable Pecuniary Interest apply to your interests and those of your spouse or civil partner or person with whom you are living as a spouse or civil partner where you are aware of their interest.

### **Access to Information**

Agendas and reports can be viewed on the Gloucester City Council website: [www.gloucester.gov.uk](http://www.gloucester.gov.uk) and are available to view five working days prior to the meeting date.

For further details and enquiries about this meeting please contact Tony Wisdom, 01452 396158, [anthony.wisdom@gloucester.gov.uk](mailto:anthony.wisdom@gloucester.gov.uk).

For general enquiries about Gloucester City Council’s meetings please contact Democratic Services, 01452 396126, [democratic.services@gloucester.gov.uk](mailto:democratic.services@gloucester.gov.uk).

If you, or someone you know cannot understand English and need help with this information, or if you would like a large print, Braille, or audio version of this information please call 01452 396396.

### **Recording of meetings**

Please be aware that meetings may be recorded. There is no requirement for those wishing to record proceedings to notify the Council in advance; however, as a courtesy, anyone wishing to do so is advised to make the Chair aware before the meeting starts.

Any recording must take place in such a way as to ensure that the view of Councillors, Officers, the Public and Press is not obstructed. The use of flash photography and/or additional lighting will not be allowed unless this has been discussed and agreed in advance of the meeting.

### **FIRE / EMERGENCY EVACUATION PROCEDURE**

If the fire alarm sounds continuously, or if you are instructed to do so, you must leave the building by the nearest available exit. You will be directed to the nearest exit by council staff. It is vital that you follow their instructions:

- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building; gather at the assembly point in the car park and await further instructions;
- Do not re-enter the building until told by a member of staff or the fire brigade that it is safe to do so.



<b>Meeting:</b>	<b>Planning Policy Sub-Committee</b>	<b>Date:</b>	<b>4 September 2017</b>	
<b>Subject:</b>	<b>City Plan Consultation Response Report</b>			
<b>Report Of:</b>	<b>Anthony Wilson, Head of Planning</b>			
<b>Wards Affected:</b>	<b>All</b>			
<b>Key Decision:</b>	<b>No</b>	<b>Budget/Policy Framework:</b>	<b>No</b>	
<b>Contact Officer:</b>	<b>Claire Haslam (Planning Officer)</b>			
	<b>Email:</b>	<b>Claire.haslam@gloucester.gov.uk</b>	<b>Tel:</b>	<b>396825</b>
<b>Appendices:</b>	<b>1. Response Report</b>			

**FOR GENERAL RELEASE**

**1.0 Purpose of Report**

1.1 To provide Members with a summary of comments received to the Draft City Plan consultation and the responses made to those comments.

**2.1 Recommendations**

2.1 Planning Policy Sub-Committee is asked to **SUPPORT** and **ENDORSE** the Response Report.

**3.0 Background and Key Issues**

3.1 Planning officers are in the process of preparing a new local development plan for Gloucester. A local development plan is a requirement of Planning and Compulsory Purchase Act 2004. Councils are duty bound to produce and keep under review the local development plan documents.

3.2 In Gloucester, the local development plan documents will consist of the Joint Core Strategy, The City Plan, and various Supplementary Planning Documents. The City Plan will provide the development framework to guide the planning and regeneration of Gloucester up to 2031.

3.2 The Town and Country Planning (Local Planning) (England) Regulations (2012) part 6 regulation 18, requires the local planning authority to notify specific bodies or persons of the preparation of the local plan and invite each of them to make representations. The local planning authority must then take into account any representations made to them. The attached Response Report serves as evidence of this process.

3.3 Eventually the Response Report will be submitted along with the Local Plan to the Secretary of State for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004.

- 3.4 The Council have previously consulted on the City Plan Scope (2011), Part 1 Context and Key Development Principles (2012), Part 2 – Places Sites, City Centre Consultation (2013).
- 3.5 The Draft City Plan builds on these documents and sets out:
- A draft vision and key principles for development in Gloucester;
  - Draft planning policies that reflect and address the local issues and opportunities in the City that, once 'adopted' by the Council, will be used to inform planning proposals and assess planning applications; and
  - Proposed site allocations for different types of development.
- 3.5 The consultation for the Draft City Plan took place between 16 January and 27 February 2017 and in accordance with the Council's 'Statement of Community Involvement' adopted in 2015.
- 3.6 Prior to the consultation two events were held specifically for Members along with various workshops and meetings with the officers. The public consultation itself consisted of:
1. Publication to the Council website
  2. Email/hard copy letters to all members of the community, organisation and stakeholders on the planning consultation database.
  3. Press advert
  4. Press release
  5. City Life Magazine article
  6. Social media notifications
  7. Hard copies of all consultation documents, supporting information and response forms made available at all 'deposit locations' – the City Council offices (including a permanent exhibition), all local libraries, the Guildhall and Tourist Information Centre.
  8. Five public consultation events held at various locations across the city.
- 3.7 A total of 267 written comments were received and all comments have been summarised in the Response Report. Full versions of all comments are available to view on the Council's website [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan)

#### **4.0 Asset Based Community Development (ABCD) Considerations**

- 4.1 The Draft City Plan consultation was wide reaching and open to participation from all members of the community.
- 4.2 The City Plan provides a future framework for the planning of sustainable communities. The policies contained within the City Plan will enable the protection of community facilities, the development of affordable homes, jobs, and the provision of accessible, safe and well designed buildings, streets and spaces.
- 4.3 All of the comments made by members of the community have been fully considered and where appropriate will be used to shape the next version of the City Plan.

## **5.0 Alternative Options Considered**

- 5.1 The consultation of development plan documents and the consideration of the responses received is a statutory responsibility for the local planning authority. As such there are no suitable alternative options.

## **6.0 Reasons for Recommendations**

- 6.1 To inform Members of the conclusions of the Draft City Plan consultation and officer's responses to the comments received. To endorse these comments enabling officer's to amend the Draft City Plan accordingly and continue working towards the next stage of the plan making process.

## **7.0 Future Work and Conclusions**

- 7.1 Once endorsed the responses will be actioned resulting in amendments to the Draft City Plan. Project planning and timetabling of the next phase of the City Plan is underway and will be presented to Members through an amended Local Development Scheme in due course.

## **8.0 Financial Implications**

- 8.1 None arising from this report.

(Financial Services have been consulted in the preparation this report.)

## **9.0 Legal Implications**

- 9.1 Publication and endorsement of the Response Report enables the council to comply with The Town and Country Planning (Local Planning) (England) Regulations (2012). Failure to comply with the regulations may jeopardise the soundness of the Local Plan and the likelihood of its adoption.

(One Legal have been consulted in the preparation this report.)

## **10.0 Risk & Opportunity Management Implications**

- 10.1 There are no known risks associated with the publication and endorsement of the Response Report.
- 10.2 Endorsing the Response Report provides an opportunity to take on board relevant comments made by residents and key stakeholders. This will enable officers to progress the Draft City Plan towards the next stage of the plan making process which will be Pre-Submission.

## **11.0 People Impact Assessment (PIA):**

- 11.1 The consultation was open to all members of the community and interested parties. Documents were available digitally, and in hardcopy. Large scale print outs of key information were also taken to all of the public events. All requests for assistance in

understanding the information were immediately dealt with to meet the individual's needs. Events were organised in key locations in order to reach as many people as possible. This included events at supermarkets, in the City Centre and at the Extra Care Village. Events were held on both weekdays and weekends and at varying times throughout the day.

- 11.2 A Health Impact Assessment and Equalities Impact Assessment formed part of the Sustainability Appraisal which accompanied the City Plan. These screening assessments found that the City Plan is unlikely to have any negative effects on protected characteristics or persons identified under the Equality Act 2010.
- 11.2 The PIA Screening Stage was completed and did not identify any potential or actual negative impact, therefore a full PIA was not required.

## **12.0 Other Corporate Implications**

### Community Safety

- 12.1 The Police Architectural Liaison Officer was consulted and provided a number of comments that will be incorporated where appropriate. The draft City Plan also contains a policy specifically relating to Community Safety.

### Sustainability

- 12.2 The aim of the planning process is to create sustainable developments. This is therefore a strong focus of the City Plan. A Sustainability Appraisal was produced and submitted for consultation alongside the Draft City Plan consultation. A number of comments were received on the matters of climate change, the natural environment and the Sustainability Appraisal. Appropriate amendments to the Draft City Plan will be made.

### Staffing & Trade Union

- 12.3 None

### Press Release drafted/approved

- 12.4 Not applicable

**Background Documents:** None



## Appendix 1 Response Report

This response report is prepared in accordance with Town and Country Planning (Local Plan) (England) Regulations 2012 Part 6, section 18. This table provides a summary of all of the responses received and an indication of how these comments will be taken forward into the next iteration of the emerging City Plan Pre-Submission Draft. The full versions of the comments are available to view at any time at [www.gloucester.gov.uk/cityplan](http://www.gloucester.gov.uk/cityplan).

### Abbreviations:

AA - Appropriate Assessment

AQMA – Air Quality Management Area

CP - City Plan

CPO – Compulsory Purchase Order

DTC – Duty to Cooperate

HMO – House in Multiple Occupation

HRA – Habitats Regulations Assessment

JCS – Joint Core Strategy

LPA – Local Planning Authority

NPPF – National Planning Policy Framework

SA – Sustainability Appraisal

SHMA – Strategic Housing Market

SPD – Supplementary Planning Document

THI – Townscape Heritage Initiative

WFD - Water Framework Directive

1.0 Introduction and overview – Comments received	Officer Response
Make more of the docks, canal and river by talking about the important role they play in the city. Recommend reference to the policy advice “Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System” published by the TCPA and Canal and River Trust.	CP will refer to the policy note suggested and will further incorporate the importance of waterways in the next draft of the plan.
Unsure about the inclusion of a Key Diagram and question what it adds to the document.	A key diagram is a requirement of the planning regulations and paragraph 157 of the NPPF.
Include cycle paths on the policy map.	Noted. Consideration to be given to this point. The map should reflect the policies of the CP.

2.0 Planning positively for the future of Gloucester – Comments received	Officer Response
The plan seeks to create a Gloucester in which I would be happy to live.	Noted.
Carry out early ecological investigations regarding the nature conservation value of brownfield sites.	Phase 1 Habitat Surveys will be undertaken across all proposed allocations at the appropriate time of year for surveying.
Support Key Principle 9 but want it to refer to connecting green assets to improve green infrastructure.	Noted. Change to be incorporated where appropriate.
Principle 12 should include reference to the provision of multi-functional green infrastructure.	Noted. Change to be incorporated where appropriate.
Generally support the Key Vision and Key Principles they dovetail comfortably with the JCS and will help to deliver the wider social, economic and environmental aims of the National Planning Policy Framework.	Noted.
Concerned that the Vision is a list of assumptions and not connected to the overarching vision chosen by residents.	Noted. The CP vision includes the wording of the vision chosen by our residents through the ‘City Vision’ process to create a ‘flourishing, modern and ambitious City.’
Support the vision especially the reference to ensuring health and wellbeing is a key consideration in all planning decisions.	Noted.
Suggested rewording of vision to include reference to green infrastructure. "New development will be built to the highest possible standard of design and multi-functional green infrastructure provision and will be focussed on protecting the quality and local distinctiveness of the City"	Noted. Change to be incorporated where appropriate.
Suggest include ‘woods and trees’, rather than just trees, in the CP vision and in Key Principle 9 and 14.	Noted. Change to be incorporated and widened to include woods, orchards and hedgerows where appropriate.
Welcome the recognition of the role of the city’s past in the economic well-being of its future.	Noted.
Key Principle 11 should be the highest priority for the City (tackling poverty and deprivation).	Noted.

3.0 Development management policies – Summary of Comments		Response
Page 11	General comments There are general concerns over the large number of policies and that some of the policies unnecessarily repeat content of the JCS.	Noted. It is not the intention of the CP to duplicate the policies included in the JCS. Further editing will be undertaken to ensure that CP is as concise as possible whilst remaining effective in providing for the City's local needs through sustainable development.
	More explanation of the relationship between the JCS policies and the CP policies and the order in which they should be applied needed.	Noted. We will look again at how we have described the relationship between the JCS and City Plan and make improvements where necessary.
	There is concern that the policies vary considerably both in the level of detail, and in their articulation; too many platitudes and vague statements. Policies should provide the framework against which developments are assessed. They need to be helpful, give clear guidance or specify requirements so that everyone using them is clear about how they should be applied. They do not provide land owners, developer or communities with a clear indication of what will or will not be permitted as required by NPPF para 154. It was also suggested that all of the policies should be checked and worded to be positive "yes unless" rather than "thou shall not" type policies and articulated more consistently.	Noted. We will look again at the structure of the policies and amend where appropriate to provide consistency and meet the requirements of NPPF paragraph 154.
	Suggested that if the policies have been deliberately written as they have it might be more helpful to categorise them as for information (you may like to know ...), guidance (it would be good if you did ...) or mandatory requirements (you must do this ...)	Noted. We will look again at the structure of the policies and amend where appropriate.
	Clear and consistent application and definitions of terms such as major development, large scale residential schemes, large scale developments, major applications, and new major development schemes required.	Noted. Further work will be undertaken to provide clear and consistent definitions throughout the CP.
	Amend the title "Key City Plan principles met" to read "Key City Plan principles addressed" as the principles will not be met until the end of the plan period.	Noted. Change to be incorporated.
A: Housing	It has been suggested that there needs to be a positive policy with regard to the site allocations, supply, deliver and trajectory to provide certainty for the allocations.	Noted. Further consideration to be given to anchoring the site allocations into an actionable policy.
	More information requested on how the residual housing requirement from the JCS will be planned for and distributed through the allocations.	Noted. More information will be provided.
	The anticipated windfall allowance is too high and that we should allocate more sites rather than relying on windfalls.	Noted. The anticipated windfall allowance is in line with the agreed JCS methodology. The LPA are doing all it can do identify and allocate as many suitable, available and achievable sites as it can to meet the housing need.

**3.0 Development management policies – Summary of Comments**

**Response**

	<p>The draft plan identifies approx. 1000 dwelling shortage of the minimum target expressed in the JCS. You would like further clarification as to why Gloucester is not providing for the minimum 14,359 as you believe this shortfall makes the plan unsound.</p>	<p>The shortage is identified in the JCS Housing Implementation Strategy (HIS). The latest version with appendices and associated documents is available via the link below.  <a href="http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx">http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx</a></p> <p>Through the JCS Examination Hearing Sessions on the responses to the Proposed Modifications (which commenced on 11<sup>th</sup> July) the Inspector will come to a view as to the acceptability of Gloucester’s shortage and the actions (over the full plan period) to meet the targets set on the basis of need.</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 12</p>	<p>The CP identifies some 23 site allocations at this stage, which it reports cumulatively will contribute to a total of 1,937 dwellings (Table 1). The site allocations set out in Table 2 of the Draft City Plan identifies only 1,010 dwellings. This is a significant shortfall upon that declared in Table 1. It is noted that Table 2 identifies site SA16 would deliver in the order of 50 dwellings. This would appear to be an error and should have referred to 400 dwellings. Assuming the figure of 400 dwellings for SA16 is correct then this results in current site allocations rising to 1,360.</p>	<p>There is a typographical error in Table 2 (City Plan Pages 81 &amp; 82) as the respondent has correctly pointed out. SA16 Greater Blackfriars should be 400 dwellings. This brings the total in this table to 1,360. The 1,937 figure in Table 1 ( City Plan Page 79) has an asterisk against it and a full explanation is given as to the reduction from 1,937 to 1,360; the main reason being that a number of large sites that were potential allocations recently got planning permission and so are now recorded as commitments in the trajectory. This process and all the figures are fully explained on pages 13 to 16 of the City Plan Topic Paper 3: Development Needs &amp; Site Allocations.</p>
	<p>The supporting refers to a number of ‘allocations’ which currently contribute to the total of 1,937 dwellings, but that are likely in the near future to be ‘reclassified’ as commitments due to planning permissions being granted.</p>	<p>Any potential allocations that are granted planning permission before the pre-submission draft of the CP will be amended to ‘allocations’. Regardless of the sites official status it will still be counted as providing towards need and supply.</p>
	<p>As the council can not demonstrate a Sedgefield 5 year Housing Land Supply on adoption of the new local plan then the policies of the JCS and the CP would be considered out of date as per para 49 of the NPPF which undermines positive and effective plan making.</p>	<p>The City Plan will not proceed to adoption until the adoption of the JCS. Strategic allocations / urban extensions in the JCS in Tewkesbury Borough, but providing for Gloucester’s need will ensure that the Council will be able to demonstrate a 5 Year Housing</p>

### 3.0 Development management policies – Summary of Comments

### Response

Page 13		Land Supply.
	<p>You feel that the City Plan should supply more sites and more flexibility in order to meet the delivery test of the emerging Housing White Paper.</p>	<p>Noted. The CP is providing as many sites as possible. All suitable, available and achievable sites have been included.</p> <p>A ‘call for sites’ was held as part of the latest round of public consultation. Sites that have been submitted will be test through the SALA process and incorporated where appropriate. We invite land owners to submit sites to the CP process at any time.</p> <p>Given the physical constraints to the city’s boundary Gloucester has a fairly limited number of sites available. The council continues to work collaboratively with its neighbours to ensure Gloucester’s housing need can be achieved in surrounding areas.</p>
	<p>Policies A4 and A5 follow different approaches to policy writing and should be made consistent.</p>	<p>Noted. Change to be incorporated.</p>
	<p>The relevant National Planning Policy Framework paragraphs should also include: Paragraphs 38 and 39, Chapter 6: Delivering a wide choice of high quality homes, and Chapter 7: Requiring good design.</p>	<p>Noted. Change to be incorporated.</p>
	<p>The Council should clearly set out the approach to affordable housing in the next version of the Draft Plan, which should be consistent with the significant evidence base and the approach taken in the JCS which specifies a requirement for 20% affordable housing in Gloucester.</p>	<p>Noted. The approach to affordable housing will be consistent with the JCS and SHMA and will reflect locally evidenced need.</p>
	<p>Given that the Council’s policies towards the delivery of affordable housing will be established in the emerging JCS, it is inappropriate for this to be repeated in the CP.</p>	<p>Noted. The CP housing policies will not repeat those stated in the JCS but rather demonstrate how the JCS policies will be applied locally.</p>
	<p>Consider policy for houses in multiple occupation – it needs properly managing.</p>	<p>Noted. HMOs are licenced by the Council. More information can be found at <a href="http://www.gloucester.gov.uk/resident/housing/housing-standards-and-conditions/Pages/Multiple-Occupancy-Homes.aspx">http://www.gloucester.gov.uk/resident/housing/housing-standards-and-conditions/Pages/Multiple-Occupancy-Homes.aspx</a> HMOs are difficult to manage in planning terms as it is possible under Permitted Development to create a HMO for up to 6 residents without the requiring the benefit of housing.</p>

3.0 Development management policies – Summary of Comments		Response
	Concern regarding the need to address affordable housing needs – everyone should be able to have a decent home that they can afford to live in.	Noted.
A1: Use of upper floors for residential	This policy uses the phrase “Critical Mass” this term has a specific meaning. It seems to only appear once in the whole document so it is assumed to be out of context.	Noted. Edit required.
A2: Regeneration of neighbourhoods	It was stated that neighbourhood regeneration may involve the development of greenfield sites but the policy is worded to suggest only brownfield redevelopment will be accepted. You would like us to further promote the use of the Active Design principles in this policy. The text under Policy A2 contains the following “Therefore it is important that the positive aspects of past housing developments are not lost and that any regeneration initiatives genuinely enhance the neighbourhoods involved” However this ‘important’ point is does not appear to form part of the policy points 1 - 7. We assume this policy only applies to Gloucester City Homes Estates and this needs to be clarified. Paragraph 4 is unclear with no explanation of how any schemes would ‘improve’ existing housing.	All comments are noted. More consideration will be given to the aims and deliverability of this policy. Whilst the council wishes to support the redevelopment of sub standard housing and increase housing supply, consideration also needs to be given to the loss of greenfield and open spaces and the wider implications of this policy. Piecemeal infilling is not considered a suitable alternative to a comprehensive masterplanned approach.
A5: Housing mix	Consideration needs to be given to the criteria of the NPPG in considering the optional standard for accessible and adaptable homes. The Council are required to provide a local assessment which justifies the inclusion of higher optional accessible/adaptable home standard, and confirm the relevant viability tests have been undertaken. You noted that the policy does not make any reference to viability as required by paragraph 173 of the NPPF.	Noted. Further evidence base will be collated as per the NPPF to justify the inclusion of any policy requiring a locally specific standard.
	You were concerned that the policy is ambiguous as it does not set out the level of affordable housing provision or preferred housing mix the Council would like to see come forward on sites.	Noted. Further work is being undertaken to assess the best way to implement the JCS policy while addressing specific housing needs in individual areas of the city.
	The justification for the policy indicates a recommended tenure split for affordable housing should be 75% in favour of rented accommodation around 25% in favour of intermediate. However, this is based on outdated evidence. A more realistic and reasonable approach would be 50:50 between rented and intermediate. The policy should also clarify that ‘affordable rented’ tenure is appropriate as set out in the NPPF.	Noted. The policy explanation does explain that this was the findings of the 2010 SHMA. Obviously the latest SHMA will be used in the next iteration of the policy.
	This policy should be amended following further work being undertaken by the Council in order to confirm what level of affordable homes can viably be delivered within the district and also the most appropriate mix of homes to be provided. Our client’s view is that 10% affordable housing is deliverable on sites within the City. Any amended policy should, however, ensure that these requirements are subject to site viability in order that it can be considered to be in accordance with the NPPF.	A robust evidence base has been prepared for JCS which indicates a minimum 20% affordable housing provision for Gloucester city is possible with the potential for more depending upon individual site viability.
	This policy should be deleted. It only repeats provision already contained in JCS Policy SD12, which is	Noted. Whilst we will look at the redrafting of this

3.0 Development management policies – Summary of Comments		Response
	in any event more detailed	policy, it is felt that there will be some requirement for a policy on this matter in order to demonstrate how policy SD12 will be applied locally.
	Ensure that the policies and definitions of affordable housing and products reflect the recent Government’s White Paper: Fixing our Broken Housing Market (Feb 2017).	Noted. Full consideration of the White Paper will be given in the next iteration of the plan. This will include mention of affordable housing products such as Starter Homes, and Rent to Buy.
	4,406 social rented homes were sold in the 2015/16 financial year and a projected nearly 250,000 social rented homes will be lost between 2012 and 2020. This is due to a combination of factors which directly correlate to the Government’s recent measures making the disposal of social housing easier. Of these social rented homes lost... 28% of such homes will be lost via the preserved and voluntary Right to Buy schemes.	Noted. The LPA recognises the national challenges however the LPA must act in accordance with the national agenda on these matters set out by central government.
A5: Housing mix  Page 15	The Council should recognise the ever-increasing need for true affordable housing to meet the needs of the many, by taking a flexible approach to encouraging delivery of all tenures so that Housing Association Registered Providers can deliver even more housing of an affordable tenure. A fundamental requirement of the NPPF is the responsibility placed upon Local Planning Authorities to “boost significantly” the supply of market and affordable housing.	Noted. The council recognises the challenges facing Registered Providers surrounding the delivery of truly affordable housing.  The NPPF places a responsibility on LPAs to boost the supply of affordable housing yet also requires LPAs to ensure that sites are viable and provide a “competitive returns to a willing landowner and willing developer” paragraph 173. This is a national policy issue.  The LPA will continue to do all that it can through plan making and application processing to negotiate and secure as much affordable housing as possible to meet the needs of the city.
	Ambitiously plan to meet affordable housing need across both the City and the JCS area. Failure to do so will inevitably cause further deterioration in the delivery of affordable housing, placing many more families on ever-increasing housing waiting lists.	Further work will need to be undertaken to explore the affordable housing issues facing the City and the impacts this may have on housing waiting lists. The CP will need to provide a policy solution to any identified impacts on need that emerge from this work.
	There are many reasons why the delivery of affordable housing is likely to be affected due to continued changes to national housing policy, which include: Welfare Reforms, Rent Reductions, Right to Buy: As part of the Housing and Planning Act 2016, Planning Policy: As a result of the May 2016 Court of Appeal decision, the changes to the Planning Practice Guidance mean that affordable	The Local Planning Authority will continue to do all that it can to secure affordable homes that reflect the evidenced need of the area. However the LPA must act in accordance with the national housing

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	housing contributions on smaller sites are no longer required.	policies set out by central government.
	With regard to viability, many key regeneration sites in the City have extenuating site constraints, for instance flood remediation, archaeology, or contamination, and a site may not be viable or economically attractive for a developer to take forward to delivery if affordable housing is always required as part of the tenure mix of a scheme.	Noted. Viability will be considered in accordance with the NPPF and the guidance provided in the NPPG.
	Attention is drawn to the fact that the White Paper also urges Local authorities to deliver new homes by establishing local housing companies or entering into joint venture models that yield housing for sale or private rent as well as affordable housing.	Noted. Comment to be passed on to the Senior Management Team.
	Attention is drawn to the White Paper immediate requirement for local planning authorities to seek to ensure that a minimum of 10% of all homes on sites of 10 units or more (or 0.5ha) are affordable home ownership products.	Noted.
	Concern that the CP would be unsound if it took forward a policy that required the delivery of affordable housing 'in all new housing development' without being subject to viability considerations.	Noted. Wording to be amended to clarify viability will of course be considered on a site by site basis.
A7: Housing choices for older people and supported and special needs housing	The NPPG states that "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling" (ID 56-009-20150327).	Noted. Further evidence base to be produced on this matter.
	The Council's evidence should not be a generic commentary about an ageing population it should be specific to Gloucester city and fully evidenced.	Noted. Further evidence on the housing needs of older persons is being produced and will form part of the next iteration of the CP.
	The Council needs to confirm that any requirement for accessible and adaptable homes has been subject to appropriate viability testing.	Noted. Further evidence base will be collated as per the NPPF to justify the inclusion of any policy requiring a locally specific standard. This includes appropriate viability testing.
A8: Self build	To be comprehensive, the policy should also refer to custom build houses. We recognise Government Policy is to assess the need for self and custom build houses through an area based register, but we consider that registers need to be more than a simple list of names. They should: <ul style="list-style-type: none"> <li>- Differentiate between self build and custom build;</li> <li>- Avoid people being able to register for more than one area which inflates demand;</li> <li>- Those on the register should be required to demonstrate they are genuinely able to progress and have the expertise to build a dwelling and/or to manage a build project and/or if a custom build scheme have a builder lined up and in addition have the necessary finance in place to proceed. All of this needs to be set out in the justification to the policy to ensure that any policy for self and custom build is implementable.</li> </ul>	Noted. Policy will be amended to include 'custom build'. The Council is maintaining a self build register inline with current government policy. There is no intention or resource to go beyond these requirements and maintain a register in the manner suggested.
B: Economic Development	Recognise that waterways can provide a catalyst for urban renaissance, regeneration and diversification. Suggested that policy should introduce enough flexibility to allow the development and improvement of waterway infrastructure to support of small and medium-sized enterprises and jobs in the craft manufacturing and service sectors and recognise that the canal is a non-footloose	Noted – Further work is being undertaken on the Economic Strategy.



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Page 17	asset which limits locational choice of related business.	
	Highlighted the contribution sport makes to the economy with a total direct economic value of £40.4m to the city with employment of 1,054 people. Plan should acknowledge D2 uses on a par with B class uses as employment - highlighting that there is usually more employment generated by a D2 use than a B8 use. You promote the use of employment sites for indoor sport.	Noted – Further work is being undertaken on the Economic Strategy.
	Exam 183 the JCS Employment Land Statement of Common Ground Summary (February 2016) provides details of those sites agreed to provide employment land supply at that point in time across the JCS area as agreed between the JCS Council's and the development industry. This document identified 13.43ha of land available at Kingsway Framework 5 for employment purposes, however no commentary is made in the document of the commercial attractiveness of the sites to the market and therefore no assessment is made of their deliverability for employment purposes within the JCS plan period.	Kingsway Framework 5 has extant planning permission for employment uses and thus there is a reasonable prospect of sites in this framework being used for that purpose.
	Opportunity requested to comment on the emerging employment evidence base when it is published.	Noted. Further employment evidence base will be made available as part of future consultations.
	The CP should also provide the opportunity for the review of historic employment commitments to ascertain their current suitability for employment development, especially in areas where new employment development would abut an existing or new residential development.	Noted. A review of historic employment commitments will be undertaken as part of the emerging evidence base through the employment monitoring.
	Relevant National Planning Policy Framework paragraphs should also include: Chapter 1, 2, 4, and 5.	Noted. Change to be incorporated.
	Relevant policies from the JCS should also include: SP1, SP2, SD3, SD4 and SD5.	Noted. Change to be incorporated.
B1: Employment and Skills Plan	The requirement for an Employment and Skills Plan for developments of more than 20 dwellings is considered to be excessive and unnecessary. Development of under 100 units are likely to have a relatively limited impact on local employment and skills and is unlikely to add anything to the process. There is also no explanation as to what such a document should include. Clearer guidance should be provided on the requirements for planning applications.	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	It is considered unreasonable that schemes of 20 or more dwellings should have to submit an Employment and Skills Plan as this places an undue burden and cost on potential small and medium sized builders as well as regional and national housebuilders who maybe seeking to deliver smaller sites.	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	While the tenor of the policy is welcome as it will improve skills and training it is considered that there is insufficient evidence published as part of the public consultation exercise to demonstrate that sites of 20 or more dwellings should have to provide an ESP	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	Rather than require yet another report we consider this requirement to be capable of being cooperated in to a Construction Employment Management Plan as an environmental benefit in reducing the need to travel. Also the justification for the policy needs to provide clear evidence for the definition of major development, which we note is different here compared to Policy F1 (20 or more units here, compared with more than 10 dwellings in Policy F1). It is unreasonable to require the	Noted – Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.

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	employment and skills plan to include targets when the policy only specifies the need to identify ‘opportunities’ for local employment and it is not clear what action will be taken to implement the targets.	
B2: Existing key employment sites	The City has not published sufficient evidence with this consultation to demonstrate that the whole of Kingsway Framework 5 should be safeguarded for B Class employment purposes as required by this policy. The site has been marketed for a substantial period of time but there has been little market interest in delivering new B Class development at this site.	Noted. Further evidence will be provided as the evidence base and employment monitoring is complete. The CP will deliver the identified quantum of employment land as set out in the JCS in the most suitable, available and achievable locations.
	The final sentence of Policy B2 is also covered by Policy B4: Existing Employment Space – it is submitted therefore that the final sentence of the policy is not required as Policy B2 is titled ‘Existing key employment sites’ and not all employment sites in the City will be ‘Key’.	Noted. Further work is being undertaken on the Economic Strategy. Consideration to be given to this point.
	The extent of Kingsway Framework 5 is not included on the Proposals Map.	Noted. The extent of the Framework 5 boundary will be included on the next iteration of the Proposals Map.
	The policy requires the addition of an exception which is included within NPPF paragraph 22 ‘where there is no reasonable prospect of a site being used for that purpose.’	Noted. Exception to be added in accordance with paragraph 22 of the NPPF.
B3: Existing employment space	This policy needs to better reflect paragraph 22 of the NPPF which states that; ‘Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.’ The retention of land for employment purposes needs to be held in balance with the fact that the City cannot meet its housing need requirements over the plan period.	Noted. Exception to be added in accordance with paragraph 22 of the NPPF.  The CP will reflect the need of both housing and employment provision. Whilst we accept the need to increase housing supply, there is an identified employment need to provide for in order to create sustainable communities. Providing homes without providing for sufficient employment opportunities is not considered a sustainable solution. It is a balance made through an assessment of the appropriate evidence base.
	In order for the City to continue to regenerate and encourage inward investment it will be necessary for sites that once provided traditional manufacturing employment in the City, especially in relation to its role as an inland port, will need to be redeveloped to provide the employment accommodation that newly emerging sectors locating to or emerging within the City.	Noted. Comprehensive work has been undertaken as part of the JCS to assess and identify the changing employment sectors. This work forms part of the CP evidence base. Employment sites will be protected where they contribute to meeting the employment need.
	This policy should also acknowledge that in order to redevelop traditional old employment sites to provide new smaller scale units or alternative employment accommodation to meet current demand	Noted.

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	that mixed use development may be required in order to ensure that redevelopment and regeneration is viable	
	The policy contains a negative obligation 'will not normally be permitted'. It should be redrafted to provide a positive obligation	Noted. Policy style to be amended.
	Some policies contain terminology that would benefit from clearer definition. For example, Policy B4 on existing employment space refers to clear evidence that the site is no longer viable and suitable for B class use.	Noted. Clarity to be provided.
C: Retail and City/Town Centres	Provide flexibility for new chandleries and marinas to support the canal function to be able to be located outside of the city centre.	Noted.
	Invest in the indoor market and other markets. The majority of residents in the City rely on markets not multinationals.	Noted. The Council is committed to retaining an indoor market within the city. Markets are important part of the vitality and viability of the city centre.
	Need for more better quality retailers and restaurants in the City Centre proper (not Gloucester Quays).	Noted. Regeneration of the city centre is a priority for the Council. The policy in the CP reflect this aim.
Page 19	More tree planting in city centre	Noted. Trees play an important role not only for green infrastructure and biodiversity, but also to health and wellbeing. Tree policies are dealt with in the Natural Environment section on the CP.
C1: Maintaining the vitality and viability of City, District and Local Centres	The JCS Inspector agreed that retail frontages and city centre boundaries, strategic retail allocations and Gloucester's comparison goods market share, are all a matter for immediate review in the JCS and should not form part of the CP. The site allocations containing retail are over inflated and that the overall approach fundamentally fails to accord with the requirements of Paragraphs 23 and 156 of the NPPF.	Noted. The JCS Main Modifications set out what the immediate retail review is likely to cover. The floorspace figures identified at part of site allocations in the regeneration are indicative and will be considered further through the immediate review.
	Strongly agree with and share the concerns raised over the increasing competition facing the city centre from out-of-centre shopping and the poor linkages between some parts of the city centre. Several expressions of concern regarding the amount of development taking place at Gloucester Quays and the Peel Centre and the impact this is having on the City Centre. Strong view that the focus now needs to shift to the City Centre proper.	Noted. The regeneration of the city centre is a Key Principle of the CP. This includes improving key linkages and protecting the centre from inappropriate out-of-centre and out-of-town development.
	There is a need for a locally defined threshold for impact assessments.	Noted.
	Concerns was raised over the time it may take to complete the immediate review as part of the JCS process, and therefore the pressing need to ensure that any interim policies set at the district level are sufficiently robust to defend against harmful, speculative out of centre development which purports to be addressing the needs of the City ahead of JCS Policy SD3 being revisited.	Noted.
	Most of the issue listed are not presented as issues, see Economic Development key issues list on	Noted. The issues list will be edited where

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	page 28 which reads as proper issues list should.	appropriate and be consistent throughout the CP.
	The CP refers to the emerging Public Realm Strategy as a key relevant strategy. However it isn't clear from this section the role it will play in ensuring an attractive, vital and vibrant town centre characterised by its rich and delightful heritage cityscape.	Noted. Further information to be added to the CP on the Public Realm Strategy where appropriate.
	What role can the historic environment play in increasing the vitality and attractiveness of the city and town centres?	Noted. The historic environment has an important and significant role to play. Further work will be undertaken to ensure this role is reflected in the text for this chapter.
	Relevant National Planning Policy Framework paragraphs should also include: Chapters 1, 2, 5, 7, 8	Noted. Change to be incorporated.
	Relevant policies from the JCS should also include: SP1, SD2, SD4, SD5, INF1 and INF2	Noted. Change to be incorporated.
	The criteria for locally set thresholds for impact assessments need to accord with the test set out in paragraph 26 of the NPPF. 200sq.m is particularly low and the evidence to which the threshold is based is out of date. New evidence should be presented given the figure is significantly lower than the 2,500 sq.m set out in the NPPF.	Local impact thresholds are to be considered as part of the JCS immediate retail review.
C1: Maintaining the vitality and viability of City, District and Local Centres	The low threshold of 200 sq.m may cause financial burden for small stores making them unviable contrary to paragraph 173 of the NPPF. Further evidence is required to justify this level.	Local impact thresholds are to be considered as part of the JCS immediate retail review.
	It was raised that there is no justification for the proposed threshold for requiring retail impact which is currently set at 2,500 sqm where proposals affect the City Centre. The NPPF threshold of 2,500 sqm is too high, particularly where city centres such as Gloucester are vulnerable and even a small out of centre scheme could have a disproportionate effect on vitality and viability of the centre. You would like us to assess where the current balance of unit sizes lies in each of the defined centres. A suitable threshold or thresholds can then be set which supports the spatial strategy for the Plan.	Local impact thresholds are to be considered as part of the JCS immediate retail review.
	Policy to also clarify that retail impact assessments will be applicable to change of use, Section 73 applications and variations to s106 agreements which may seek amendments to existing permissions which necessarily restrict the level and type of goods that can be sold.	Noted. This to be considered the JCS immediate retail review.
	You feel that the policy fails to reflect the key criteria within the NPPF for assessing proposals for main town centre uses in edge and out of centre locations. Specifically paragraphs 24 – 27.	Noted. The requirements of the NPPF will be addressed through a combination of the JCS immediate retail review and the Gloucester City Plan.
	No guidance is given as to what this impact assessment should address and indeed what the implications will be should an Applicant fail to demonstrate that there will be no impact on the relevant centre. There is also currently no requirement for Applicants to undertake a sequential assessment for main town centre uses as per the guidance set out at Para 24 of the NPPF (this only appears to apply to visitor attractions as part of Draft Policy C2).	This policy provision is set out through the Joint Core Strategy and will be considered further through the JCS immediate retail review.
	The policies in the plan do not match the policies drafted in the background topic paper.	Noted. The background topic paper was produced in advance of the draft CP and has evolved since the time the paper was written; therefore the policies

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Page 22		do not match. Further changes are expected as further evidence base is produced.
	We recommend this additional clause to promote culture and the use of vacant spaces. The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise key centre locations and the public realm.	Noted. The idea to use buildings in a temporary manner is generally supported. However this would not warrant a policy as in many cases a temporary use may not require planning permission. During the next edit we will look at how we can bring culture into the supporting text in a relevant way.
	Gloucester BID task groups alongside Gloucestershire County Council are presently running a feasibility study on improvements to lower Eastgate Street, similar to those at Kimbrose Triangle. This should be reflected in City Plan.	Noted. Any evidence generated or advancements made by the BID task group will be included where appropriate.
	There should be an ambition for the redevelopment/improvement of the Eastgate Centre within the plan lifetime. Whilst this may not be deliverable I think the council should be encouraging appropriate changes. In particular there should be schemes to improve the facades on Eastgate Street and Southgate Street - perhaps with a modern re-interpretation of the former Bell Hotel facade.	Noted. Unless the development of a site is deliverable it can not be included in the CP. Appropriate redevelopment which improves facades whilst positively responding to the local context will generally be supported by other policies.
	You feel that the policy appears to have been positively prepared and seeks to encourage new tourist related development in the city centre.	Noted.
C2: Visitor attractions	You wish to see tourists attractions clustered or co-located with existing facilities such as Gloucester Quays to capitalise on existing attractions and businesses.	Noted. Many of the city's tourist attractions are based on historic elements that would not be practical or desirable to relocate. Clustering attractions at the Quays would only profit businesses at the Quays and would not help in the overall aim of the CP to strengthen and regenerate the City Centre.
	Promote tourism by having a permanent sculpture trail around the city centre (the scrumpties were a huge success). Make the sculptures about famous Gloucester connections – Harry Potter, Beatrice Potter, Dick Whittington, Daleks etc. It will really help draw people around and tourists will want to photograph them all.	Noted. Idea passed to relevant Member, Tourist Information Centre and Culture Board.
C3: Overnight accommodation	The adopted City Council Strategy “Growing Gloucester’s Visitor Economy” updated the Hotels study done by the JCS and identified that there is a pressing need to build extra Hotels in the city centre Gloucester – especially in the full service sector. This has now been included in JCS reference documents. <a href="http://www.gloucester.gov.uk/council/Documents/Strategies,Plans%20and%20Policies/Growing_Gloucesters_Visitor_Economy.pdf">http://www.gloucester.gov.uk/council/Documents/Strategies,Plans%20and%20Policies/Growing_Gloucesters_Visitor_Economy.pdf</a>  Recommend – include reference to this strategy in City Plan and explicitly focus on opportunities to	Noted. The CP will be amended to reference this document. Specific allocation of hotel sites is considered restrictive to the market and may sterilise sites while hotels develop on other sites.

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	make land available CITY CENTRE for hotels to locate. Without development their will be barriers to growth in the visitor economy.	
	More 4 star hotels needed.	Noted.
C4: Major cultural venue	The Theatres Trust supports this policy. Culture and the creative industries play a key role in developing vibrant city centres, which are the economic and social heart of sustainable communities. Culture and cultural activity helps develop a sense of place and is what makes a centre unique and special. We support cultural led development and encourage Council to use this as a catalyst for wider regeneration. Cultural venues are important by supporting the local and visitor economy and by attracting people to these centres where other businesses then benefit from the flow on effects. We believe local plans should therefore support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities.	Noted.
Page 22	The Guildhall is a major cultural venue.	Noted. The Guildhall is an extremely important part of the cultural offer of the city. The CP is seeking to support a proposal for a much larger venue.
	The plan doesn't mention Blackfriars which is also a cultural venue for the city.	Noted. Amend CP to include reference to Blackfriars.
	The plan doesn't mention GL1 which holds most of the large scale cultural events for the city yet isn't funded properly to be able to do these events justice.	Noted. Amend CP to include reference to the programme of events held at GL1.
	The council says it wants another venue but it can't properly fund or look after the 2 other theatres in the city.	The Picturedome is privately owned and is not the responsibility of the council. The council own the freehold to Kingsbarton Theatre and are responsible for the fabric of the building. The theatre itself is run by a charity.
	The city really needs a flexible space for participatory arts, dance, theatre, music. No other local city has anything like this. A place to learn to perform and be a large space for viewing performances like dance, gymnastics and circus plus orchestral. With the flexibility to put on small music and theatre shows. Local producers like Checkers gym should be consulted, as well as dance schools, music and performance schools.	Noted. Comments will be passed onto the Cultural Board.
	But not another large venue for music as the city couldn't afford the upkeep of facility or technology that a building that size would need for the amount of use it would have.	Noted. Comment will be passed onto the Cultural Board.
	Development of a venue/arena/exhibition centre/ banqueting space needed.	Noted. Comment will be passed onto the Cultural Board.
	D: Health and Wellbeing	You fully support policies to improve health and wellbeing and you encourage the use of waterways and towing paths for leisure, recreation and sporting activities as part of the 'natural health service', acting as 'blue gyms' and supporting physical and healthy outdoor activity;
	You would like to see more commitment to the protection and provision of woods and trees in the health and wellbeing section given that they make a valuable contribution to social inclusion, health,	Noted. More emphasis around this point to be included in this chapter.

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	and the environment.	
	You welcome the bringing together of these policies under the Health and Wellbeing heading. However, you feel that by separating out green infrastructure features (Policy D2: Outdoor Space; Policy D4: Allotments; Policy D5: Open Space), and conversely to include a discrete green infrastructure section F: Natural Environment (F5: Green infrastructure), represents a missed opportunity to emphasise the role green infrastructure can play as a strategic framework for recognising and promoting the multi-functionality of each of these features and how they link together as a network.	Noted. Consideration will be given to the structure of these policies and perhaps the merging of the two chapters.
	You welcome that pollution and contamination are included within this section of the Plan. However you consider the wording of policy D12 pollution could be improved to incorporate more of an enhancement stance, rather than being just about prevention. Furthermore it should state that development proposals should be accompanied by appropriate reports (i.e. assessments of potentially polluting aspects).	Noted. These reports are required as part of the validation checklist for planning applications. However reference to them could be made.
	You welcome that policy D13 contamination includes protection of groundwater as well as human health.	Noted.
	Please note that the Health & Wellbeing Strategy referred to in paragraph 1.7 is owned by the Gloucestershire Health & Wellbeing Board – made up of a range of health, social care and other partners – not the County Council.	Noted. Amendment required.
	It may be helpful to include a definition of health inequalities in the Glossary to assist readers' understanding of this term. NICE defines this as: "Health inequalities are differences between people or groups due to social, geographical, biological or other factors. These differences have a huge impact, because they result in people who are worst off experiencing poorer health and shorter lives." ( <a href="https://www.nice.org.uk/advice/lgb4/chapter/introduction">https://www.nice.org.uk/advice/lgb4/chapter/introduction</a> )	Notes. Amendment required.
	The County Council's Public Health team welcomes the strong focus on the health and wellbeing of Gloucester residents in the City Plan Vision and throughout draft City Plan and the identification of the role that planning can play in improving health and wellbeing and tackling health inequalities through development management policies.	Noted.
	The focus on the key issues for Gloucester, including obesity, diabetes, suicide and substance misuse, is particularly welcomed. Paragraph 2.23 refers to the specific health and wellbeing issues for Gloucester City and the latest Public Health England health profile (2016) suggests the draft City Plan has identified issues which are supported by evidence - <a href="http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000081.pdf">http://fingertipsreports.phe.org.uk/health-profiles/2016/e07000081.pdf</a> .	Noted.
	References to both physical and mental health and wellbeing throughout the draft City Plan are also welcomed as they help to underpin the principle of parity of esteem, enshrined in law by the Health & Social Care Act 2012 ( <a href="https://www.centreformentalhealth.org.uk/parity-of-esteem">https://www.centreformentalhealth.org.uk/parity-of-esteem</a> ).	Noted. Reference to Health and Social Care Act to be referenced where appropriate.
	The Public Health team welcomes the requirement for major applications to be supported by a health impact assessment (p42). However, it would be helpful to understand how the quality of these	Noted. Further work with our partners will be undertaken to establish a best practice methodology

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Page 24	assessments will be assured.	for the production and assessment of Health Impact Assessments.
	The role of the City Plan in tackling health inequalities could possibly be strengthened by identifying common areas, e.g. of lack of access to sport facilities and play areas (referenced in Paragraphs 2.25 and 2.27) and higher deprivation.	Noted. Further consideration to this point required.
	As well as the strong focus on specific health and wellbeing development management policies, the draft City Plan makes helpful connections to wider determinants of health in other policy sections, such as housing. For example, Policy A7 (Housing choice for older people and supported and special needs housing) should support independence for older people and those with additional needs, helping to improve quality of life and wellbeing and reduce pressure on statutory health and social care services. Policy H1 (Sustainable transport) presents opportunities to improve health and wellbeing through active modes of transport, as well as reducing congestion and improve the environment. However, the connections with health improvement could possibly be strengthened in other policy areas, such as F. Natural Environment (specifically F5. Green Infrastructure).	Noted. Further consideration will be given to the bringing together the various threads of health and wellbeing and presenting them in the clearest way possible.
	Healthcare facilities are essential infrastructure . When planning for new settlements, the Council should ensure that they work with NHS commissioners (Gloucestershire CCG & NHS England) and providers to ensure that adequate healthcare infrastructure is provided to support new residential development and to mitigate the impact of population growth on existing infrastructure.	Noted. The LPA have consulted with the GCCG and NHS at every stage of the plan making process and will continue to do so.
	Where new, improved, or extended health facilities are required to mitigate the impact of new development, health commissioners would require Section 106 / CIL funding towards the capital cost of delivering this infrastructure. An assessment of the appropriate mechanisms for delivering the required funding will need to be undertaken at an early stage in collaboration with the Council.	Noted. The LPA have met with representatives of the GCCG in order to establish the need for health facilities given the quantum of proposed development. The GCCG have not been able to supply the LPA with an evidence requirement or inform us of sites they require to be protected for future health care facilities.
	Relevant National Planning Policy Framework paragraphs should also include: Chapter 4: Promoting sustainable transport, Chapter 7: Requiring good design, Chapter 8: Promoting healthy communities, Chapter 9: Protecting Green Belt land, Chapter 11: Conserving and enhancing the natural environment.	Noted. Change to be included.
	The relevant policies from the JCS should also include: Policy SD4: Sustainable Design and Construction, Policy SD5: Design Requirements, Policy SD6: Green Belt, Policy SD7: Landscape, Policy INF5: Social and Community Infrastructure.	Noted. Change to be included.
D1: Active design	We would like to see reference in this policy to the role greening route for active travel can play in delivering multiple benefits, for example active lifestyles in green areas can multiply the benefits for mental wellbeing.	Noted. Change to be included.
	I think providing safe bike lanes to schools, preferably separated from road, should be looked at. We should be aiming to reduce car use in Gloucester to reduce congestion and pollution, improve the	Noted. This issue will be looked at under the context of Sustainable Transport. Cycle lanes are the



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	<p>health of the inhabitants and make the streets and Gloucester more pleasant. It would make sense to me to take the most of the budget needed to improve cycle paths could be taken off the road budget as the less traffic using the roads the less maintenance they need. I think subsidies should be given</p> <p>It needs to be stressed that to "encourage walking to local amenities and services", streets and paths/pavements should be maintained in good order, and be safe and free from puddles and dirt/litter. The city plan ought to be more assertive about improving public walking routes, particularly those that lead into the city centre (e.g. Kingsholm Road and Worcester Street).</p>	<p>responsibility of the County Council and the CP will continue to encourage and support the inclusion of them in new development.</p> <p>Noted. Public footpaths are maintained by County Council Highways. Any issues with the safety or quality of footpaths should be reported to Highways by telephoning 08000 514 514</p>
D2: Outdoor space	We would like to see reference in this policy to the important played by long term management and maintenance of outdoor amenity space and garden space to more effectively ensure its function/s and benefit/s over time.	Noted. Change to be considered.
D3: Accessibility	<p>You would like us to further develop the changing places policy and include it within infrastructure. You would like us to expand the Changing Places toilet statement to a policy: Any sports and play areas should be accessible for disabled children and young people and include play equipment suitable for disabled children and include a Changing Places toilet and changing space in sport/ leisure development (see below). Thousands of people with profound and multiple learning disabilities, as well other disabilities that severely limit mobility, cannot use standard accessible toilets. People may be limited in their own mobility so need equipment to help them or may need support from one or two carers to either get on the toilet or to have their continence pad changed. Standard accessible toilets (or "disabled toilets") do not provide changing benches or hoists and most are too small to accommodate more than one person. Without Changing Places toilets, the person with disabilities is put at risk, and families are forced to risk their own health and safety by changing their loved one on a toilet floor. This is dangerous, unhygienic and undignified. It is now accepted and expected that everyone has a right to live in the community, to move around within it and access all its facilities. Government policy promotes the idea of "community participation" and "active citizenship," but for some people with disabilities the lack of a fully accessible toilet is denying them this right. Although the numbers are increasing, there are still not enough Changing Places toilets across the country, and Gloucestershire has very few at all. Providing these toilets in public places would make a dramatic difference to the lives of thousands of people who desperately need these facilities. Information on Changing Places can be found here: <a href="http://changing-places.org/">http://changing-places.org/</a></p> <p>The policy is very vague and imprecise. In particular what does 'taking account of what different people say they want so people can use them in different ways' mean and how can it be assessed and implemented in policy terms? Also phrases like 'use with dignity' and 'convenient and welcoming' in clauses 1 and 2 are equally vague, and offering more than one solution it is imprecise. Whilst having sympathy for the good intentions of this policy it does not work as a formal Local Plan policy.</p> <p>We would like to see a reference in this policy to the role community engagement can play in delivering accessible and inclusive design. Development proposals that effectively engage all members of society, and consider how to integrate the needs of all user groups into a design, are</p>	<p>Noted. Consideration will be given to the creation of a Changing Places policy and to the expansion of the accessibility policy to cover public buildings, open spaces and sports facilities.</p> <p>Noted. "Use with dignity" is an obvious right for all. Consideration will be given to tightening the policy wording.</p> <p>Noted. Comments to be included where appropriate in the next iteration of the plan.</p>

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	more likely to deliver development schemes which can be enjoyed by all community members into the long term. The work published by the Barnwood Trust on sustainable communities and inclusive design, in particular ‘Welcome to The Future’ (2016) is particularly useful in this regard. They recommend methodologies for encouraging developers to consider the accessibility and inclusivity of developments at each stage; and suggest ways to move beyond compliance by encouraging development proposals to create communities where everyone can flourish, enjoy healthy and active lifestyles and actively contribute to their community.	
D4: Allotments	It was noted that the need for this level of allotment provision is not evidenced by the policy and it is considered likely that this would result in excess provision. Additionally, this policy does not take any account of the areas of the city which may have adequate provision. This could lead to an oversupply in certain areas of the city resulting in allotments being unused or users having to travel in order to reach their allotment which would not represent a sustainable form of development.	Noted. Further evidence will be undertaken to assess need and spread of provision.
Page 26	It was also noted that the policy does not make any reference to viability considerations as required by paragraph 173 of the NPPF and therefore, should the Council be able to present evidence which supports the continued inclusion of this policy within the Plan, wording should be added to make clear that this requirement is subject to viability.	Noted. Viability testing will be added to the policy.
	You suggested that the policy should be reworded as: “In housing developments of 30 or more dwellings, the Council will require the provision of a fully serviced allotment site to a standard of 0.2 hectares (1/2 acre) per 1,000 population where it can be demonstrated that such provision is necessary. Off-site financial contribution will be acceptable where on-site provision is not feasible. This requirement is subject to viability...”	Noted. Policy to be amended.
D5: Open space	We would like to see reference in this policy to the important played by long term management and maintenance of Open space to more effectively ensure its function/s and benefit/s over time.  Policy D5 – needs an ‘or’ to allow off site when not appropriate on site.	Noted. The council has no authority to manage or maintain private spaces but will continue to encourage developers to consider the long term management and maintenance of their land. Public open spaces owned or adopted by the council will continue to be maintained and managed by the council.  Noted.
D7: Protection of open space and playing fields	Part 5 does not work because it is not always necessary to provide a greater quantity, if the replacement is through 3G or 4G pitches which will require less area in quantity terms but would considerably increase capacity	Noted. The adopted Playing Pitch Strategy shows that for most grass sports, the City has a shortage of pitches now and in the future. It is important therefore to ensure that new developers make adequate provision for the needs arising the new communities that will live in their developments.

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	The policy is contrary to national policy because it includes a presumption against. This should be redrafted to provide a positive obligation because Paragraphs 14 and 15 of the NPPF require plans to reflect the presumption in favour of sustainable development. Negative policies reinforce the reactive development control mind-set rather than the positive development management approach suitable for a genuinely plan-led planning system.	Noted. There is a presumption against the loss of playing fields where there is evidence to justify this position. This is NPPF compliant.
D8: Community facilities	You feel that the overarching objective of the policy reads as a guide to facilitate the redevelopment or change of use of community facilities.	Noted. The policy is structured to allow the disposal of community facilities that are genuinely surplus to requirements and unsuitable, whilst protecting against the unnecessary loss of viable community facilities. It is of no value to a sustainable community to have abandoned building sitting unutilised due to overly restrictive policy making that does not allow for their reuse.
	Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.	Noted. The policy is structured to allow the disposal of community facilities that are genuinely surplus to requirements and unsuitable, whilst protecting against the unnecessary loss of viable community facilities.
	Restrictive policies that prevent the loss or change of use of 'community facilities' and include healthcare facilities within this definition can prevent or delay required investment in alternative facilities and work against the Council's aim of providing essential services for the community. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.	Noted. This information collated by the NHS could be submitted as evidence to satisfy the policy as part of the planning application process.
	Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).	Noted. Properties that can demonstrate that they are surplus and meet the tests of the policy can be redeveloped for other uses. However, it would be presumptuous to assume that housing is appropriate on all sites that are currently utilised for healthcare. Each site would need to be considered on a site by site basis.
	Many community facilities are run by community volunteers, charities, etc and are therefore not considered 'viable' in a developer sense. Given these facilities are essential to support local communities, we would encourage council to put a greater emphasis on community need (or demonstrate a lack of need) rather than financial viability.	Noted. It would be deemed unreasonable of the council to force a building owner to continue running a building at a personal loss regardless of whether or not there is a community need for the facilitate. However the caveats of the policy have

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		<p>been designed to ensure that any lost facility is replaced to accommodate the evidenced community need, and that the claims made by the owner are robustly tested through the implementation of the policy.</p>
<p>D10: Air quality</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 28</p>	<p>It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted.</p>	<p>Noted. Further consideration will be given to the air quality evidence base and the wording of the policy.</p>
	<p>We would expect to see a cross-reference here to Policy F5: Green infrastructure, to recognise the role green infrastructure can play in mitigating the worst effects of air pollution in urban environments, for example planting street trees alongside highways.</p>	<p>Noted. Change to be included.</p>
	<p>I notice that Barton Street and Painswick Road are both areas where the Air Quality is unacceptably low. As I use these routes regularly I wondered what measures were actually being taken to improve this situation. In general the main source of air pollution seems to be from cars and buses. Are active steps being taken to encourage electric cars and buses?</p>	<p>Noted. There are currently two charging points in the city for electric cars. Funding is available from central government to install charging points, both for local authorities, residents, businesses and charities. Further information about this and the council’s advice for reducing air pollution can be found at <a href="http://www.gloucester.gov.uk/resident/pests-pollution-and-food-hygiene/pollution/Pages/Air-Quality-in-Gloucester.aspx">http://www.gloucester.gov.uk/resident/pests-pollution-and-food-hygiene/pollution/Pages/Air-Quality-in-Gloucester.aspx</a></p> <p>Further information will be added to the supporting text to sign post developers to this funding.</p> <p>The council reports annual on its progress towards delivering the government’s air quality objectives. The air quality work links with the Local Strategic Transport Project which is key to reducing car usage and promoting sustainable transport. The council has also been working with bus operators to upgrade existing bus fleet to Euro-4 compliant vehicles that are less polluting. More details of this and other work that the council are doing can be found in the annual report.</p> <p>The next version of the CP will be looking at intensifying tree planting in the city through the identification of areas to be woodlands and orchards.</p>
	<p>We would like to see a reference here to the important role that tree planting and retention can play</p>	<p>Noted. Text to be expanded to incorporate the role</p>

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	in improving air quality in Gloucester. Trees further improve air quality through the adsorption of particulates from vehicle emissions and other sources – such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University). The Woodland Trust has published a report entitled Urban Air Quality which explains how trees can specifically help improve air quality.	of tree planting. Further work to be undertaken to look at tree planting patterns and the Air Quality Management Areas.
D12: Pollution	There was support for this policy as it was felt that it will help to protect the waterways from pollution.	Noted.
Page 29	You suggested the following wording: Development that may be liable to cause pollution of water, air or soil, or pollution through noise, dust, vibration, light, heat or radiation will only be permitted if appropriate and sufficient mitigation is included in the development proposal to evidence that the quality and enjoyment of the environment would not be unduly damaged or put at risk in the short, medium or long term.	Noted. Change to be incorporated.
	We welcome that pollution and contamination are included within this section of the Plan. We consider the wording of policy D12 pollution could be improved to incorporate more of an enhancement stance, rather than being just about prevention. Furthermore it should state that development proposals should be accompanied by appropriate reports (i.e. assessments of potentially polluting aspects).	Noted. Consideration will be given to the suggestion of enhancement but we must ensure that all policies are reasonable. The appropriate documents are required through the planning application validation process. Where appropriate these could be referred in the supporting text.
D13: Contamination	There was support for this policy as it was felt that it will help to protect the waterways, groundwater and human health from pollution and contamination.	Noted.
D14: Cordon sanitaire	You would like to see the evidence that the cordon sanitaire boundary is evidenced and up to date. You consider the policy unsound without this. It was also suggested that the second paragraph explaining the ‘blight’ of the designation should be removed if it is not scientifically proven and justified.	Noted. We have requested this information from Severn Trent. At the time of writing we are still awaiting a response. When a response is received this information will be fed into the next version of the CP.
	The onus is on the developer to prove (via odour surveys etc) that any new development will not be adversely affected by the proximity of our works and / or that they will fund appropriate Odour mitigation works to address any odour issues.	Noted. However the CP has a responsibility to deliver sustainable and healthy communities. It is unacceptable to the would be exceptionally bad planning to allow development in an area
D15: Suicide prevention	It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted.	Noted. Further guidance will be produced either through the CP or an accompanying guidance note.
	You welcome our recognition that spatial planning can play a role in helping to prevent deaths by	Noted. Local examples can help inform the evidence

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Page 30	suicide through its policies and the inclusion of a suicide prevention policy (Policy D15) in the draft City Plan. In particular, the wording of the policy to include all buildings with four storeys or more is based on evidence of where the policy can have greatest impact – for example, we know from local evidence from the Police that the inclusion of barriers on the Gloucester Royal Hospital car park has prevented deaths – and avoids differences in interpretation about what constitutes public access to a building. Since around 2009, the rate of deaths by suicide in Gloucestershire has been higher than the England rate.	base.
	You would welcome us expanding the policy to other forms of development where there may be a risk of suicide attempts, e.g. waterside development, where there is sufficient evidence that it may have an impact on preventing deaths.	Noted.
	You recommend the document “Preventing suicides in public places – A practice resource” published by Public Health England, and acknowledge that responsibility for suicide prevention lies with local authorities.	Noted. Reference to the document to be included in the CP or supporting background evidence base.
	Gloucestershire Suicide Prevention Partnership Forum have offered to provide support and advice to Gloucester City Council planners in their application of this policy.	Noted. We welcome the offer of assistance on this matter.
	Again, whilst we have sympathy with the sentiments of the policy, we do not think it works or is appropriate as a formal Local Plan policy. Also the wording of the policy does not make sense. What does the sentence ‘mitigation measures are well designed and incorporated into the design of the building’ mean and how is to be applied in policy terms?	Noted. Further details will be provided but the council will not negate on its responsibility for suicide prevention.
	I am writing on behalf of the Gloucester Samaritan Branch to offer support for the plan in respect particularly of the consideration and planning around keeping the city safe, particularly tall buildings and waterways.	Noted.
E: Historic Environment	You suggested that the River Severn should be identified as a heritage asset.	Noted.
	Heritage – Drop in centre/opportunity for advice on Listed properties – how to maintain, or materials needed for repair etc	General advice can be sought from the council’s conservation officer. There is also information available on the council’s website. The THI scheme also runs workshops for building owners.
	Mindful of the important role that heritage related tourism plays in the City’s local economy and the City’s evident ambition to grow this sector, it is surprising there is no reference to it as a key issue. I refer to GCP paragraph 2.17. How does the Plan, and its positive strategy for the historic environment, support the City as a heritage visitor destination? How can it harness the benefits of heritage to the economy of Gloucester?	Noted. Strengthen tourism and heritage link through the supporting text. Work is currently underway through the ‘Great Places’ bid. Section to be expanded.
	At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment...”. (NPPF paragraph 9). Hence one would expect to see the consideration of the role of the historic environment across the Plan.	Noted and agreed. Work to be undertaken to carry heritage through other policy areas as in the JCS.

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Page 31	<p>Historic England would encourage reference to how the City’s heritage strategy including for example Project Pilgrim at the Cathedral, public realm and other improvements that can help to improve the visitor experience.</p> <p>As a result how might the GCP conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment? What opportunities are there for heritage-led regeneration?</p>	<p>Noted. Reference to be included to the History Festival, THI, Living over shop initiative, Project Pilgrim, Great Places bid money etc. The council are currently working on the production of a Heritage Strategy.</p>
	<p>Section E of the Draft Gloucester City Plan includes historic environment information and policies which are appropriate to the archaeological significance of the city and its hinterland. Policies E1 and E2 and their accompanying text are supported. The plan is supported by an extremely detailed evidence base including a historic environment topic paper and 17 site specific historic environment assessments undertaken for the SALA. Potential archaeological constraints are also identified where required in the information regarding individual allocations in the draft plan and the site allocations topic paper.</p>	<p>Noted.</p>
	<p>Both the draft plan and historic environment topic paper make clear the City Council’s commitment to continue supporting the joint Gloucestershire Historic Environment Record.</p>	<p>Noted. The Historic Environment Record forms a crucial part of the evidence base.</p>
	<p>This section on the GCP provides the means to set out the proposed heritage strategy to meet national policy expectations. However and notwithstanding the many commendable positive measures referred to, to fully accord with NPPF paragraphs 126 and 157 HE would suggest that this section of the GCP needs further development, setting out in greater detail a “positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment”.</p> <p>A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness. HE believes that it is clear from the NPPF requirements that the Government is expecting local planning authorities, through their Local Plans, to actively deliver the conservation and enhancement of the historic environment. The Government’s use of the words and phrases “seeking positive improvements”, “positive strategy”, “deliver the conservation and enhancement” and “a clear strategy for enhancing” all demonstrate that it is not sufficient for local planning authorities to be merely reactive in the conservation and enhancement of their historic environment.</p>	<p>The council are currently working on the production of a Heritage Strategy which will expand on these points. In the meantime we will add a list of positive works at the beginning of the chapter. Including History Festival, THI, Living over shop initiative, Project Pilgrim, Great Places bid money, culture board work, regeneration sites, etc</p> <p>Add reference to “seeking positive improvements” and “positive strategy” to the text of the CP.</p>
	<p>We assume the priority regeneration sites will help to restore, reconnect, rejuvenate important locations within the historic core and provide an opportunity to celebrate and enjoy Gloucester’s rich and varied heritage. Might these be referenced?</p>	<p>Noted and agreed.</p>
	<p>Can this section of the GCP refer to, for example, the plans for the Cathedral (the finest example of</p>	<p>SPDs are available of the Heights of Buildings and</p>

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	Perpendicular Gothic architecture in the world), the role of Policy G17: Views of the Cathedral, public realm improvements; the benefits of the large regeneration sites within the city centre; the prison's refurbishment, and; the role of heritage in the tourist economy? Might it also refer to initiatives such as at St Aldates (Policy SA11), Blackfriars (SA16), Southgate Street THI etc? A single heritage map highlighting the assets, and the spatial initiatives would be very informative.	the Public Realm Strategy which have visual maps. Further consideration will be given to the idea of a single heritage map, although it may be the case that this is best placed in the emerging Heritage Strategy.
	The GCP should indicate what SPDs have been prepared, when they should be applied and where they are available e.g. Heights of Buildings SPD. Likewise regarding Conservation Area Appraisals and Management Plans and Article 4 directions.	Noted. Relevant SPDs to be listed in the text.
	What is the role of the Townscape Character Assessment and Public Realm Strategy?	TCA will provide an evidence base of how the city evolved and the characteristics of each distinct area. The PRS will provide guidance on improvements to the public realm.
	The Council may find it useful to specify the types of evidence it would expect to see submitted as part of planning proposals. Any list of evidence need not be exhaustive but would help all parties understand the Council's requirements in this regard and may help speed up the determination process for these types of planning application.	Noted. This information is contained within the validation checklist. A review of the checklist is ongoing. Pre-application advice is also available from the council.
	What is the role for CIL and/or s106 in the delivery of heritage related regeneration initiatives?	Noted. There are no specific projects identified through the CIL work for heritage initiatives.
	What indicators should be used to monitor the heritage strategy's effectiveness?	To be confirmed through the emerging Heritage Strategy.
	How might the defining characteristics of each part of the City be reinforced in the approach to design?	Through the TCA , the Design Policies listed in section G and effective Development Management.
	The GCP needs to consider whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157).	Noted. The Heights of Buildings SPD provides guidance. The requirement for any Article 4 designation will be determined through future Conservation Area reviews.
	Can the GCP refer to the relevance of Gloucester's Cultural Vision and Strategy (2016-26) and, Growing Gloucester's Visitor Economy (2014) and how the GCP can help deliver their aspirations as part of a positive heritage strategy?	Noted. The emerging Heritage Strategy will bring together all relevant documents.
	You welcomed the preparation of the Historic Environment Topic Paper and ward profiles.	Noted.
	Preserving and enhancing a heritage asset (the H&G Canal and associated buildings) as a tourist attraction, as well as engaging local community and volunteer groups.	Noted. The policies benefit and protect all assets including waterways.
	The text does not identify the Key Issues as is done in other sections of the GCP. Instead the narrative provided presents a discussion without actually pointing to what the key issues are.	Noted. The key issues have been identified.
	In order to help clarify the significance of the historic environment in Gloucester, it would be useful to specify the number and type of historic environment designations, for example, how many listed buildings there are, or how many conservation areas there are and whether these designations are	Noted. This information is included in the background topic paper. Consideration will be given to pulling across more of that information across



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	supported by up to date appraisals (if not, whether there are any proposals to undertake new appraisals in future).	into the CP.
	Does this section in the GCP fully reflect the Historic Environment Topic Paper?	Noted. Consideration will be given to pulling across more of the information held in the topic paper across into the CP.
	The City Council could increase the emphasis they place on the importance of heritage and refer to the fact that the Heritage Lottery Fund is already investing significant funds into the city over the first five years covered by the consultation plan.	Noted. Expand more on this point.
	I would welcome the inclusion of archives in the definition of culture/heritage as we play just as significant role in the city as the libraries and museums, even though our remit is county-wide.	Noted. The council acknowledges the significant role and contribution archives play in the heritage of the city.
	An Article 4 designation for Alexandra Road, Denmark Road and Heathville Road to protect traditional timber joinery on these streets. (See the replacement windows at 23 Alexandra Road and compare to 21 Alexandra Road for an example of the negative impact window replacement can make.) Similarly look to invest in a THI scheme for London Road/Northgate and the eastern portion of Eastgate Street once the work on Southgate has been completed.	Noted. There are no resources to undertake this at this time. Article 4 designations will be reviewed as part of future Conservation Area reviews. In terms of THI schemes the most pressing area at this time is the Barton St Conservation Area. Grants have previously been offered in Eastgate Street.
Part 6332 Historic Environment development management	Support the protection, conservation and enhancement of waterways' heritage and their built environment.	Noted.
	Policy E1 refers to further guidance being found in Energy Conservation in Traditional Buildings, English Heritage, 2008. This document was superseded in April 2016 by new guidance from Historic England	Noted. Policy to be amended.
	Could we also suggest the following addition: Applications affecting the significance of a heritage asset will be required to provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation.	Noted. This is already included within the chapter.
	Could we also suggest the following addition: Gloucester's Historic Environment Record including Conservation Area Character Appraisal, Management Plans, Local List and Townscape Character Assessment will be used to inform the consideration of future development including potential conservation and enhancement measures.	Noted. The conservation team already utilise these documents in the formation of their responses to planning applications.
	Could we also suggest the following addition: You may wish to include reference to the matter that proposals should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.	Noted. Wording to this effect is already contained within the NPPF which we do not wish to repeat.
	Could we also suggest the following addition: Clarification in the policy or accompanying text that the historic environment includes all heritage assets such as historic buildings, conservation areas, historic parks and gardens, landscape, town and cityscapes of importance and archaeology.	Noted. A description is provided in the glossary.
	Historic England notes this welcome core policy as an important part of a clear and positive strategy	Noted. Change to be incorporated.

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Page 34	for the historic environment (NPPF Paragraphs 9 and 126). This will in turn help support the delivery of development that will afford appropriate protection of the City’s heritage assets and make a positive contribution to local character and distinctiveness. However modest adjustments are required to ensure clarity and conformity with national policy expectations. The second bullet point of Policy E1 refers to a series of criteria as “guidance” which suggests they are optional. However this is clearly not the intention as they are policy requirements; consequently the word guidance should be omitted.	
	The 4th bullet point refers to conservation area policy but limits the consideration to architecture and history. It is suggested that character and appearance are referred to, to align with S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990); and which architecture and history are contributory factors of.g. Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.	Noted. Change to incorporated. Character and appearance to be included in this point and in bullet point 2. Bullets to be changed to a numbered list.
	The 5th bullet point solely refers to substantial harm. Could we suggest the following as an alternative: Great weight will be given to the conservation of Gloucester’s heritage assets. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.	Noted. Change to be incorporated.
E3: Buildings of local importance	Policy E3 refers to Conservation Area Consent. This was abolished by the ERR Act (1) 2013 and replaced with a requirement for planning permission for demolition in a conservation area.	Noted. Policy wording to be amended.
F: Natural Environment	An issue was raised over whether biomass was no longer considered environmentally friendly and is now thought to be polluting and possibly contributing to deforestation.	Noted. Clarification sought and reference to biomass to be removed if appropriate.
	Disagree with the findings of our Habitat Regulations Assessment Screening and believe that there will be a significant effect on the Cotswold Beechwoods.	Noted. Growth in the CP will not exceed the levels of growth expressed and tested through the JCS process. The JCS has set the overall level of growth and a HRA was undertaken during its preparation. The HRA screening of the JCS found that for 12 of the 13 identified European sites there would be no significant effects, although there was some uncertainty regarding the in combination effects on 7 European sites as a result of changes to Air Quality, Disturbance and Water Levels & Quality. There was

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		<p>also uncertainty around the significant impacts that short range atmospheric pollution might have on the Cotswolds Beechwoods SAC. Therefore, an Appropriate Assessment (AA) was undertaken to gain a more detailed understanding of the possible significant impacts which may occur. The AA made a number of recommendations to ensure potential impacts on European sites did not occur, including conducting a transport assessment and a water cycle study, and strengthening the flooding policy. Overall the HRA concluded that with consideration to the recommendations provided, the Draft JCS would not have significant alone or in combination effects on the integrity of the identified European sites. There was some uncertainty raised during consultation and examination by Natural England regarding the potential recreational impacts on the Cotswolds Beechwoods SAC and proposed mitigation measures. However, this has now been resolved through a HRA Addendum Report<sup>8</sup> (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and Natural England. No further concerns on the HRA have been raised during examination of the JCS and therefore, it can be concluded that the strategic development proposed for Gloucester in the JCS will not have adverse effects on the identified European sites.</p>
	<p>Need to acknowledge that natural environments provide the settings for certain sports and activities: climbing, caving, aerial sports and aquatic sports such wind surfing, sub-aqua etc, which can not be take place elsewhere. Consideration needs to be given to management plans to allow these activities to start or continue to mitigate for any potential harm.</p>	<p>Noted.</p>
	<p>The text does not identify the Key Issues as is done in other sections of the GCP. Instead the narrative provided presents a discussion without actually pointing to what the key issues are.</p>	<p>Noted. Edits to be made where appropriate.</p>
	<p>Is bullet point 7 on social unrest through increased migration in the correct category?</p>	<p>Noted. The Foreign Office has reported of the risk of unprecedented migration as a result of climate change.</p>
	<p>The bullet points under this introductory section do not include any reference to rare or protected</p>	<p>Noted. Amendment to be made where appropriate.</p>

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Page 36	<p>species or those of principal importance for the purpose of conserving biodiversity as required under Section 41 of the Natural Environment and Rural Communities Act 2006.</p>	
	<p>There is no specific reference in the Evidence Section for biodiversity or geodiversity, and that considerable information held by the Gloucestershire Centre for Environmental Records (GCER) about biodiversity in the City and RIGS held by the Gloucestershire Geology Trust which is not referenced. You suggest we use this sources when considered brownfield sites.</p>	<p>Noted. Sources to be added.</p>
	<p>On page 56 within the Natural Environment Key Issues whilst the floodplain of the River Severn is briefly mentioned, there is no other reference to flood risk (from all sources) which we believe is a significant oversight within this part of the plan. It is noted that climate change has been specifically highlighted and whilst the plan quotes ‘Resilience to weather extremes, especially the heat island will be a key issue.’ We feel an equally key issue for Gloucester will be resilience to the impacts of climate change on flooding from all sources within the urban area and where this bounds the Severn floodplain.</p>	<p>Noted. Agreed. More to be added to this section on this important issue.</p>
	<p>The plan fails to identify the Local Wildlife Sites which are mentioned by National Planning Policy Guidance at Paragraph: 012 Reference ID: 8-012-20140306. Further details of these sites are available from the Local Records Centre at <a href="http://www.gcer.co.uk/">http://www.gcer.co.uk/</a> The missing Key Wildlife Sites appear to be: Gloucester &amp; Sharpness Canal KWS, The Causeway, Quedgeley KWS, Robinswood Hill Country Park KWS, Matson Wood KWS, Hucclecote Meadows KWS, Barnwood Arboretum &amp; Park KWS, Sandhurst Lane Meadows KWS, Alney Island KWS, Sud Meadow KWS</p>	<p>Noted. All Local Wildlife Sites to be included.</p>
	<p>Section F has a good range of policies for the protection and enhancement of the natural environment and is welcomed.</p>	<p>Noted.</p>
	<p>Relevant National Planning Policy Framework paragraphs should also include: Chapter 4, 7, 8, 9, 10 and 11.</p>	<p>Noted. Change to be included where appropriate.</p>
	<p>Relevant policies from the JCS should also include: SD1, SD4, SD6, SD7, SD10, SD15, INF3, INF4 and INF6.</p>	<p>Noted. Change to be included where appropriate.</p>
	<p>Support for a specific orchard policy (as has Tewkesbury Local Plan ENV6 Orchards, for example); especially the restoration of old orchards and creation of new community orchards. The policy should cover not only orchards as a discrete piece of land, but also linear orchards (ie, fruit trees growing along paths and public rights of way, and on hedge lines) and veteran fruit trees. The policy should also encourage imaginative street scene planting schemes such as the “fruity streets” which have been done on the award winning Applewood development at Cashes Green, Stroud, as well as forage trails. The reasoned justification should also refer to the importance of orchards on the grounds of biodiversity (upto 1800 species of fauna and flora), amenity, culture, history, and as a genetic resource. They are also of economic value. Veteran perry pears can live up to 300 years and require expert evaluation and management. A good way to mitigate biodiversity and landscape loss is through orchard planting. (Detailed information about the benefits of orchards was given and can be found in the full response.)</p>	<p>Noted. Consideration to be given to the inclusion of an orchard policy and wider reference to be given to orchards, woodlands, trees and hedgerows wherever the natural environment is mentioned throughout the CP. We are undertaking an exercise to map all of the orchards and woodlands.</p>

3.0 Development management policies – Summary of Comments		Response
F1: Landscape	This policy should acknowledge that some development will need to be located on countryside land in order to meet the housing, employment and retail needs of the area. Such development will inevitably cause a degree of harm to the landscape but this needs to be weighed in the overall balance. The policy should also acknowledge that some development may need to be located within the higher sensitivity landscape areas in order to achieve the most sustainable forms of development.	Noted. Development located on higher sensitivity landscape will not normally be permitted.
	<p>Whilst there is a landscape policy in the JCS, this is more related to the setting of settlements rather than development in the urban area and so a more specific landscape policy in the Local Plan would be appropriate. However, the Local Plan position is confusing by including two separate landscape policies F1 and G4. The two policies should be combined and revised as follows:</p> <ol style="list-style-type: none"> <li>1. The first paragraph of F1 should begin ‘development proposals on . . .’</li> <li>2. Evidence for and justification of the definition of major development should be provided and the difference between the definition for major residential development in this policy and Policy B1 resolved.</li> <li>3. The second paragraph to F1 should be deleted because it only repeats the provision of JCS SD7 but in a less satisfactory way.</li> <li>4. The third paragraph of F1 is unclear. There is no definition of ‘sites of higher sensitivity’ or what ‘increased scrutiny’ of these sites mean.</li> <li>5. In Policy G4, requiring landscape schemes to be on a single plan is unnecessary and restrictive.</li> <li>6. Paragraph 2 of G4 should also enable the replacement of such features where it will be inappropriate for them to be retained (eg to provide access through a site).</li> <li>7. It is not necessary to emphasise housing schemes in this policy.</li> </ol>	<p>Noted. F1 to be renamed ‘Landscape Character’ or similar to provide distinction between this and G4. G4 to be renamed ‘Landscape proposals on new development’.</p> <p>The combination of the two policies is not deemed appropriate at this time.</p> <p>Amendments to definitions and phrasing to be undertaken where appropriate.</p> <p>Further consideration will be given to any overlap with SD7 and the policy amended where appropriate.</p>
F2: Biodiversity	You welcome and support this policy but feel that it could go further.	Noted. Further consideration to be given to strengthening this policy in light of responses received.
	The JCS includes a detailed policy on biodiversity which deals with international, national and locally designated sites as well as undesignated sites and the impact of new development on biodiversity and so therefore this policy is unnecessary. In addition the policy itself is badly drafted. How is small scale piecemeal erosion of ‘background biodiversity’ to be assessed and how will it be prevented? Secondly, the second paragraph is clearly an aim and background justification and should in any event not appear as part of a formal policy. For all the above reasons the policy should be deleted.	Noted. Further consideration to be given to the necessity of this policy and its alignment with the JCS SD 10.
	The policy does not go on to deal with biodiversity in other situations or more broadly and does give reference to the NPPF on this topic. We suggest that this policy begins by highlighting the role which the planning system can play in conserving and enhancing biodiversity by adding: “All development should seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible, including by establishing coherent ecological networks that are more resilient to current and future pressures”.	Noted.

3.0 Development management policies – Summary of Comments		Response
	<p>We note that this policy is to be used in conjunction with the policy in the Joint Core Strategy (JCS). However we feel the policy could be more positively and definitively worded. Currently it refers to government aspirations, but it should be clear about what the Council expect development to deliver as part of this. For example, see the comments above about opening up culverts and providing easements. It could also refer to the need to provide mitigation and enhancement measures for particular species such as otters and fish. In addition, the policy could include specific references to planting for climate change mitigation and adaptation, and retrofitting of SuDS. The evidence to support such is within Paper 1 Climate Change (see comments below in that section.) Furthermore we would welcome reference to the WFD in this policy/supporting text. (See also our comments on WFD in the 'Paper 10 Natural Environment' section of our letter.) We would be happy to provide further advice, in conjunction with Natural England and the County Ecologist if required.</p>	Noted and accepted.
	<p>Policy F2 – it is suggested the phrase 'of background biodiversity' is replaced with 'biodiversity in general' and 'mitigated against' to 'mitigated to avoid loss'. Otherwise this is a very relevant policy for an urban area such as Gloucester.</p>	Noted. Change to be incorporated where appropriate.
F3: Nature Improvement Area Page 38	<p>The policy is, in principle, supported with an objection restricted specifically to the inclusion of allocation site SA23. The sites referred to should be removed from the proposed NIA designation for the primary reason that they are not part of the flood plain but part of the higher land on which the settlement of Hempsted has been founded.</p> <p>It is acknowledged that if the amended NIA boundary suggested here is accepted it will abut site SA23 to the west and south. SA23 would be an adjacent site.</p>	<p>NIAs are not designated through the CP. They are 'recognised' by the Local Nature Partnership. As such the CP can not remove sites as a NIA. NIAs are not strict barriers to development. They are priority areas offering good opportunities for ecological network restoration and improved habitat management. This work can sometimes be realised through the development management process.</p>
	<p>The policy is badly worded. If as in the supporting paragraph the intention is to secure off site biodiversity offsetting then the policy needs to say that, and guidance provided on how it is to be achieved.</p>	Noted. Change to be incorporated where appropriate.
F4: Trees and hedgerows	<p>It was suggested that we do more to create, protect and enhance woodlands and orchards given the many health benefits they can bring to a city.</p>	Change policy name and text to include reference to woods and orchards. Commit to planting more trees and identify these areas on the policy plan.
	<p>In dealing with retention of trees on development sites, rather than relying on 'appropriate retention' which is open to interpretation by different parties involved, it is preferable to say development proposals should minimise the loss of existing vegetation that is important or of value in ecological, recreation, historical or landscape terms. This then provides the opportunity for the applicant to demonstrate how the policy requirement is met.</p>	Noted.
	<p>This policy would be much stronger if it actually specified the number of new trees a developer is required to plant e.g. a certain number based on the size of the site.</p>	Noted. It is more flexible to look at each site and its individual context. Some sites will inevitably require more planting than others. On other sites, such as in the core of the central area, it would not necessarily

3.0 Development management policies – Summary of Comments		Response
Page 39		be possible to plant a set number of trees on site. We will explore the idea of diverting tree planting to nominated woodlands.
	The wide reaching benefits of trees in urban areas were highlighted in detail including health and wellbeing, urban heat island, urban cooling, climate change, flood amelioration, local economy and biodiversity. Extensive comments were received in support of increasing woodland in line with national policy, the councils statutory duty under Section 197 of the Planning Act (1990), NPPF para 114 and 117, England Biodiversity Strategy (Biodiversity 2020 published by DFRA 2011), the Government Forestry Policy Statement (Defra Jan 2013):. Detailed policy examples from East Hants, Solihull, Stroud and others were provided. habitat expansion, like native woodland creation, should form a high priority for Gloucester’s new City Plan.	Noted and accepted. Further work to be undertaken to highlight the important contribution made by trees to the urban environment. Policy and provision to be strengthened.
	We welcome a policy dedicated to the protection and planting of trees and hedgerows. However, we feel that stronger statements could be made here. For example, ensuring every opportunity is taken to secure new planting as part of any new development proposal, rather than just ‘appropriate retention and new planting’.	Noted and accepted.
	In addition to a strong commitment to increase tree cover across Gloucester, it is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. Detailed policy examples provided in full comments.	Noted and accepted. Ancient trees, ancient woodland, veteran trees and large urban trees to be afforded more status and protection through the CP.
	We would like to see Policy F4 contain a more robust statement in support of woodland creation and tree planting as part of a green infrastructure approach. The Woodland Trust also calls for Gloucester City to back up this policy with a specific Trees and Woods Strategy. Good practice guidance for local authorities on developing a Trees and Woods Strategy can be found here. (link provided) Further we would recommend the following wording with regard to ancient woodlands, ancient trees and veteran trees: ‘Development which would result in the loss of Ancient Woodland or Ancient trees and veteran trees will not be permitted other than in wholly exceptional circumstances’	Noted and accepted. Ancient trees, ancient woodland, veteran trees and large urban trees to be afforded more status and protection through the CP. In addition monitoring and review could include the number of trees lost and planted.
F5: Green infrastructure	We welcome support for the provision and enhancement of Green infrastructure. The Trust promotes the canal and towpath as ideal examples of multi- functional Green Infrastructure due to the range of benefits they bring to an area such as a sustainable transport route, an ecological corridor and a free recreational resource, a freely accessible to all. We will continue to work with the council to promote the waterway as green infrastructure within the IDP and other council documents.	Noted. Reference the canal and towpaths to be incorporated into the supporting text.
	We welcome the inclusion of reference to the Gloucestershire Wildlife Trust green infrastructure benchmark, and can confirm GCC have been assisting in its development, showing their commitment to influence the high quality of green infrastructure coming forward in all new strategic planning proposals.	Noted.

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Page 40	We feel that to include a discrete policy in the Local Plan for green infrastructure represents a missed opportunity to emphasise the role green infrastructure can play as a strategic framework for recognising and promoting the multi-functionality of each of these features and how they link together as a network. Although clear links are made to the JCS Green Infrastructure Strategy, which includes locally focused actions for Gloucester, and a Gloucester GI Map, we are not sure how these two documents will support in each in practice and feel this policy does not serve to clarify that. The policy here refers to a Green Infrastructure Plan (GIP) for Gloucester City, however we're not clear what this document is, or where it sits as there is no reference in the JCS GI Strategy to a discrete GI Plan for Gloucester City, with delivery section instead including all three district areas. We would seek further clarification on this to better understand how this policy F5: Green infrastructure will support the delivery of a network of multi-functional and connected features and areas to meet both the objectives of the Gloucester GI Map, the JCS GI Strategy as it relates to Gloucester, and the wider objectives for the Natural Environment and Health and Wellbeing articulated in this draft Local Plan.	Noted. Further explanation and understanding of the interplay between the GI documents required.
	There is lack of clarity over what document the policy is seeking to implement, either the Gloucestershire County Council Green Infrastructure Plan or the JCS Green Infrastructure Strategy. Also we note that neither document is identified in the Sustainability Appraisal list of key plans and programmes. In any event it is not appropriate to apply the same policy to development both within and adjacent to the identified GI feature.	Noted. Further clarification to be provided.
	It is essential that woods and trees are recognised and explicitly referenced within this policy as a component part of green infrastructure across the city.	Noted. Reference to trees and woodlands to be added.
	Policy F5 – is supported particularly as it implements the Local Nature Partnership's and JCS's objectives for Green Infrastructure.	Noted.
F6: Geodiversity	Gloucestershire Geology trust holds the most complete record on RIGS in the county. It was highlighted that while Gloucester only has a handful of RIGS in the county, it does have some of the most important. Robinswood Hill being the finest example of Lower Jurassic exposure of any inland Jurassic section.	Noted.
	Objection to this policy as currently worded as it starts with a presumption that geological features should be removed if they are in the way of development.	Noted. Amendments to be made where appropriate.
	It would be helpful if a definition of Regionally Important Geological Site (RIGS) was included in the glossary for the benefit of public understanding.	Noted. Definition to be included.
	It is not clear how the policy requirement that any proposal that impacts on a RIGS will be re-sited?	Noted. Policy wording and clarification to be expanded.
F7: Flooding	While acknowledging that as a low lying City on the edge of the Severn Floodplain that the following may not always be feasible, we recommend that this policy includes reference to Natural Flood Management (NFM) techniques as a way of addressing flooding issues. This could include supporting interventions in the catchment above the City from which much of the water passing through the City and creating potential flooding problems arises.	Noted.



3.0 Development management policies – Summary of Comments		Response
Page 41	The JCS includes a more detailed policy on flooding and therefore this policy should be deleted. In addition it is unclear, because it does not provide a definition of 'large scale development'.	Noted. Definition to be provided.
	The effective management of water, reducing the impact of flooding, and helping to enhance local amenity value and biodiversity through the provision of green space.	Noted.
	The details contained within it are very broad as it relies on those policies set out within the JCS and current National Planning Policy. Whilst on page 62 the second paragraph of the supporting text to policy F7 (flooding) highlights Gloucester's unique position at the interface of fluvial and tidal events, but within the last paragraph on the page the SFRA for the JCS is said only to highlight the impacts of fluvial flooding. However both the Level 1 and 2 SFRAs identify all forms and sources of flooding.	Noted.
	We consider the policy needs to contain a commitment to opening up culverted watercourses through development sites. This can reduce flood risk and improve ecology and water quality, as well as adding amenity value to development sites. Where the above is not possible sufficient maintenance easements must be provided on both sides of any culverted watercourse.	Noted. Suggestion to be incorporated into CP.
	The supporting text refers to the Environment Agency's Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment (March 2016), this is information provided by the Environment Agency which can help inform a strategic approach to flood risk management in the Gloucester area. In this Initial Assessment, our consultants have carried out computational hydraulic modelling of 44 scenarios to assess their impact on River Severn water levels. Scenarios modelled include those to convey flood flow and also include new or raised defences in a number of locations. They have looked to see whether there are any scenarios which could potentially attract a funding contribution from Defra's Flood and Coastal Erosion Risk Management Grant in Aid. The assessment has concluded that there are no scenarios which are likely to have the full costs met by government funding and all would need to be partially or wholly funded by third parties. Whilst this document may help to contribute to a wider strategic approach to dealing with flood risk issues it is felt inappropriate to refer to it in isolation within this plan. We would therefore wish to see the following wording removed from the proposed document. "The Environment Agency Briefing Note "Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment" March 2016, seeks to protect properties predominantly within Westgate Ward by increasing flood defences along the Eastern Parting of the Severn. Development that contributes to the delivery of the Environment Agency plans outlined in the Briefing Note, and any subsequent amendments, will generally be supported." Similar wording also needs to be removed from the Flooding Topic Paper on page 3 as follows. "With regard to flooding associated with the river Severn, the EA have undertaken detailed hydraulic modelling of over 40 scenarios to assess their impact on water levels in and around Gloucester. This has taken account of tide and high river levels. Scenarios ranged from bypass channels to the raising of traditional flood defences. The scenarios were then tested against an economic model to assess	Noted. Wording to be removed from the CP and any revision of the Topic Paper as requested by the Environment Agency.

**3.0 Development management policies – Summary of Comments**

**Response**

	<p>viability. The initial assessment suggests that raising of defences at certain sites around Gloucester, in particular around Westgate will deliver the most benefit. And also on page 5 of the same document as follows; Given the unique position of Gloucester at the interface of tidal and fluvial events in the Severn, any development within the Severn Floodplain will be expected to increase flood flow across this area. The Environment Agency Briefing Note: Reducing flood risk from the River Severn in Gloucester and the surrounding area – Initial Assessment (March 2016) seeks to protect properties predominantly within Westgate Ward by increasing flood defences along the Eastern Parting of the Severn. Development that contributes to the delivery of the Environment Agency plans outlined in the Briefing Note, and any subsequent amendments, will generally be supported.”</p>	
	<p>Concerns over the following wording; “Large scale development within flood zone 2 and 3 in Lower Westgate will be expected to contribute to new flood defences along the eastern parting of the River Severn”. This gives the impression that development within flood zone 3 is deemed acceptable by the local authority. It also suggests that new defences are planned within this part of Gloucester, which is not the case. Although we are currently investigating the viability of raising the height of the defence protecting properties on Alney Island in Gloucester we are not currently investigating other raised defences in the Westgate Ward area. Therefore again we request that this wording is removed.</p>	<p>Noted. Text to be amended where appropriate to provide clarity over this issue.</p>
	<p>The policy also makes no reference to climate change in relation to flood risk, this doesn’t just mean mitigation for new development but also adaption of existing development where appropriate. It is suggested the text is also amended to reflect that developers should design and construct flood risk management solutions which, rather than being done in isolation with an individual development, helps to contribute to an overall strategic approach to flood risk management in the Gloucester City area.</p>	<p>Noted. Reference to climate change to be incorporated.</p>
	<p>A strategic approach to managing flood risk that takes into account wider strategic objectives for Gloucester could be of benefit, both for the short and longer term. We suggest that this strategic approach includes actions to manage flood risk, improve resilience and provide suitable recovery from flooding, whilst taking into account wider strategic objectives for the area and opportunities to join these up for multiple benefits.</p> <p>The wider objectives and opportunities could include new development and/or regeneration, infrastructure planning, including transport links, as well as environmental, social and amenity improvements. The Environment Agency is willing to take part in the development of this strategic approach, which we envisage should be led by local authorities in the area.</p>	<p>Noted. Discussions to be held between officers and EA in order to progress the suggestions made.</p>
	<p>It is considered that a more appropriate paragraph could be incorporated within this part of the final Local Plan. An initial suggestion could be as follows, but we would welcome further discussion with you about this part of the Plan; As part of its ongoing commitment to reducing flood risk within the city the council will, subject to meeting other national and local policy objectives, support any development that contributes physically or financially to the delivery of any proposed flood alleviation plans or schemes that have a wider benefit to communities at risk within the City of</p>	<p>Suggestion noted. Amendments to be made where considered appropriate. Discussions to be held between officers and EA in order to progress the suggestions made.</p>

3.0 Development management policies – Summary of Comments		Response
Page 43	<p>Gloucester. Climate Change Section: As highlighted above the supporting text very much concentrates on mitigation and makes little or no mention of adaptability (though this is referred to very briefly in G16). It also makes no mention of climate change resistance (prevention) and only refers to resilience which is a lower grade of protection.</p> <p>This links with the comments in the flood risk section regarding this: “The effective management of water is important in the development of sustainable communities. It reduces the impact flooding may have on the community, maintains the quality and quantity of our water environment, and can help to enhance local amenity value and biodiversity through the provision of green space.”</p> <p>As part of any development proposals the opportunity should be taken to reinstate open watercourses and maintain/improve riverside habitats by providing appropriate biodiversity easements.</p>	
	Any opportunities being sought in relation to flood risk alleviation or improvement can relate to any drainage authority and the plan policy should reflect this.	Noted. Ensure reference to ‘drainage authority’ rather than a named body.
	The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Stemming the flow – the role of trees and woods in flood protection. This policy should reference the role of tree planting in flood prevention. We note that tree planting and SUDS are mentioned as mitigation factors in policy F10 but would recommend cross-referencing here.	Noted. Amendments to be incorporate where appropriate.
	The Lead Local Flood Authority will fulfil its statutory duty to provide advice to the Local Planning Authority when requested to do so regarding the management of surface water relating to major planning applications with the aim of ensuring related flood risk is managed as effectively as possible.	Noted.
	The JCS includes a more detailed policy on flooding and therefore this policy should be deleted. In addition it is unclear, because it does not provide a definition of 'large scale development'	Noted. Further consideration to be given to the purpose of the policy and definitions to be provided.
	The canal can also be used in flood prevention as it provides a conduit to allow water movement away from Gloucester at times of high river levels.	Noted.
	The words ‘flood defence infrastructure’ should be changed to flood risk management infrastructure, as this can include ‘hard’ defences, but also ‘softer’ options such as property level protection, conveyance and storage schemes, and flood warning systems including the gauges needed to support them.	Noted. Change to be incorporated.
F8: Potential of river and canal	Support and welcome the recognition that the Canal/River to many development sites in particular has the potential to provide heating and cooling for new build and retrofit and you offered to provide details to potential developers at pre-application stage when required.	Add commentary that the Canal and River Trust can provide early advice on this process should it be required.
	The very high flows in the canal could provide a significant amount of heat and any new development should consider this as early as possible in the planning process and seek further advice from the	Noted.

3.0 Development management policies – Summary of Comments		Response
	Canal & River Trust.	
	You object to this policy as currently worded as there is no proviso to take into account the potential impacts of any installation in the watercourses on biodiversity. The Trust suggests that the policy is qualified with “...will generally be supported providing there would be no adverse impact on the biodiversity of the watercourse and its riparian habitat.”	Noted. Biodiversity to be considered and policy amended as appropriate.
	A development which exploits the renewable energy potential of the River and Canal. It must be noted that this scheme is part of the H&G Canal and NOT the Sharpness Shipping Canal. The scheme would link the original navigation (which closed in 1881) between Gloucester and Hereford.	Noted. Error to be corrected where appropriate.
	There needs to be reference to environmental protection as part of any proposals to exploit the potential of the river and canal for renewable energy projects. For example such projects need to be carefully designed so as to avoid impacts on fish, wider ecology, water quality and water resources. All of which are key requirements to protect and enhance under the terms of the Water Framework Directive (WFD). We are generally supportive of such schemes where it is demonstrated that they would not result in deterioration of the water body under the WFD.	Noted. Biodiversity to be considered and policy amended as appropriate.
	Policy should contain a commitment to open up culverted watercourses through development sites. (Or this should appear in F7 or F2) As well as being environmentally advantageous, opening up culverted watercourse can add significant amenity and economic value to development sites.	Noted. Reference to opening up culverts to be included.
P609: Efficiency Measures & F10	We question the practicality of providing green roofs on residential development due to the roof pitches on most residential buildings	Noted. The policy makes no reference to the provision of green roofs on all buildings.
G: Design	Relevant National Planning Policy Framework paragraphs should also include chapters 1,2,4,6,7,8,9,10,12	Noted. Change to be incorporated where appropriate.
	The relevant policies from the JCS should also include: SD1, SD4, SD5, SD7, SD9, SD10, SD11, SD12, SD15	Noted. Change to be incorporated where appropriate.
	Need a policy like the current BE.19 to protect the enclosure of front and side gardens on existing open plan estates.	Noted. Policy to be included given the significant number of open plan estates and Radburn layout housing within the city.
	Support for policies to ensure good design on key sites.	Noted.
G1: Living conditions	The policy is badly drafted. It begins ‘the development should not . . .’ What development? It should say something like ‘development proposals . . .’	Noted. Wording will be addressed.
G2: Car parking	While the need to design parking to reduce the opportunity for vehicular crime is to be supported, it is submitted that it may not be possible in all circumstances, especially in regeneration projects, for car parking to be overlooked by active frontages.	Noted. It is possible through good design to ensure the provision of secure and overlooked parking. This is especially important on new regeneration schemes to ensure that good design is built in from the outset and that crime and the fear of crime are reduced.

3.0 Development management policies – Summary of Comments		Response
	In order to make best use of brownfield land or to achieve higher densities as promoted by the Housing White Paper (Feb 2017) innovative approaches to parking will be required in urban locations, including undercroft parking.	Noted.
	What uses does this policy relate to? If it applies to residential development it is too restrictive. Frontage parking is not always appropriate or practical and can have design impacts. The policy should allow side parking and where it can be justified small overlooked parking courtyards.	Noted. Policy to be expanded where appropriate to define use and alternative parking methods.
	There is significant pressure on parking. Recommend expansion of Castle meads with single story decked parking above (relatively inexpensive option). Support decked solution/Multistory for Westgate Carpark if it can be done sympathetically and accommodation is made for coach parking. There is a pressing need for a coach parking solution for the city with over 300 coaches visiting events such as Tall Ships and Quays Victorian Market. This is likely to increase at 7% per annum. Recommend expansion of Castle meads to include Coach Parking plus limited additional coach parking at new Kings Quarter and possibly Nortgate Street/Worcester Street development. The latter will encourage flow through the city for events, benefitting all retailers	Noted. There is ongoing work underway to assess the current and future parking needs for the City.
G3: Materials and finishes	The policy requires architectural detailing and finishes to be of a 'high quality' and whilst the supporting paragraph sets out what this applies to, it does not say how high quality will be assessed.	Noted.
G5: Bin storage	The policy should begin 'development proposals should achieve . . .'	Noted. Change to incorporate where appropriate.
G5: Bin storage	The policy wording does not make sense and starts with a statement that 'bin storage areas are well designed'	Noted. Text to be revised.
G6: Cycle parking and storage	The policy merely relates to Gloucestershire County Council Parking Standards and should be deleted as it is not necessary for plans to repeat guidance set out elsewhere.	Noted. Consideration to be given to the removal of the policy. Supporting text to be moved to Sustainable Transport section.
G7: Public realm	No specific comments received.	Cross reference with comments received for Section E: Heritage.
G8: Public art	NPPG (ID236-004) provides specific guidance on public art – 'planning obligations should not be sought – on for instance, public art – which are clearly not necessary to make a development acceptable in planning terms.'	Noted. The NPPF does not state "for instance public art". The NPPF recognises that cultural wellbeing is part of achieving sustainable development, and includes cultural wellbeing within the twelve core planning principles which underpin both plan making and decision taking. The NPPF also states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. Both these aims are supported by the integration of high quality

3.0 Development management policies – Summary of Comments		Response
Page 46		public art. Policy to be expanded to include culture and the Cultural Strategy work.
	As there is no evidence for including public art contributions the policy should be deleted. Anyway there is a lack of clarity about what development the policy applies to. The policy refers to ‘new major residential schemes’ and the supporting paragraph to ‘suitable new developments’ with no definition of either.	Noted. Public art is complementary to good urban and building design and is a social and cultural investment. Definitions to be provided.
	The requirement for all schemes delivering more than 10 dwellings to contribute to this policy is unreasonable and would adversely jeopardise the viability of some sites that are suitable for residential development in coming forward. This is contrary to the NPPF which seeks to enhance the delivery of housing and the Housing White Paper (2017) which seeks to accelerate the delivery of new homes across the country.	Noted. However this is simply not the case. The council accepts that not all sites will have the capacity within viability terms to deliver public art. This is why the policy ‘seeks provision’ rather than demands provision. However public art need not be an expensive and of a large scale. Public art can provide benefits to both existing and new communities and developers.
	It is suggested that when contributions towards public art or heritage conservation are required from development that this be stated in a site specific policy, rather than apply a blanket policy in the City Plan. Such a S.106 contribution requirement should also be subject to the viability of the scheme in question, and should be taken into consideration alongside other contribution matters, such as the delivery of affordable housing, open space and play provision, education contributions and highway contribution requirements.	Noted. Viability is always considered by the LPA in accordance with the NPPF.
	To require all ‘major’ development schemes across the City to make a financial contribution towards public art or conservation of a public heritage asset is overly onerous.	Noted.
	The policy or the explanation should ensure the new or emerging communities have a chance to comment on any art, it's commissioning and installation. Waiting till the development is occupied will allow the new residents to partake in the process and have a sense of ownership, without feeling subjected to historic public consultations.	Noted. An important point to be considered and incorporated where appropriate.
G9: Community safety	As with Policies G1, G3, G9 and G16, the policy should begin ‘development proposals should not harm . . .’	Noted.
G10: Delivering strategies	The policy should be deleted because it repeats other strategies and is vague and unclear referring to ‘taking every viable opportunity’.	Noted. Further consideration to be given to this policy.
G11: Development alongside main	Request that this policy is extended to include development at key locations along the canal and river, which act as a main route into the city for pedestrians, cyclists and boat traffic. As these types of traffic are moving more slowly poor quality development has a bigger impact as visible for a longer period of time. Development should interact with the towpath and waterspace not turn its back to provide a frontage elsewhere. This would be particularly important in the Bristol road area where any	Noted. Policy to be expanded accordingly.

3.0 Development management policies – Summary of Comments		Response
routes	development opportunity should pay attention to views from the waterway as well as the road frontage.	
G12:	This is a statement and not a policy and should be deleted.	Noted.
Design standards	Design are somewhat subjective and it would be difficult to measure success or failure as part of any future monitoring	Noted.
G13: Large-scale 20 <sup>th</sup> century buildings	This policy has the same wording as policy G11 Noted.	Noted. This was a publication error.
G14: Transport arrival nodes	It is not clear what transport arrival nodes are. They are not defined or listed in the supported text or shown on the proposals plan.	Noted. Transport arrival nodes to be listed.
Page 47 G15: Gulls	The Trust recognises the problems which gulls can cause within the City but it is important in the rationale to explain the reasons behind this problem. Currently the policy addresses the symptoms without giving recognition to the cause – see full comments for causes.	Noted. Supporting text to be expanded where appropriate.
	Given the presence of an SPD we do not feel that this topic requires a specific policy.	Noted.
	It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted	Noted.
G16: Design and climate change	The policy should begin ‘development proposals should achieve...’	Noted. Policy to be edited where appropriate.
	It was raised that this policy is too general and does not tell developers, land owners or local communities what will or will not be permitted.	Noted. Further consideration to be given.
G17: Views of the Cathedral	This policy would be better placed in the Historic Environment Chapter.	Noted. Consider relocating policy.
	The policy should begin ‘development proposals should not harm . . .’	Noted. Policy to be edited where appropriate.
H: Sustainable Transport	Key Issues – a key issue that should be included is the lack of direct rail services to the north and south west of the country on the current Cross Country franchise. A city the size of Gloucester needs greater connectivity to the north and south west rail corridor to encourage tourism and improve economic activity and opportunities for residents.	Noted. This is a matter for Network Rail and the individual train service operators.
	Key issue is the need to improve access for cyclists and pedestrians from the city centre to the hospital and surrounding area through improvements to the railway station. The references to station improvements throughout the Plan are welcomed particularly the need to improve the subway and improve access from across the city centre but should be flagged up as a key issue that needs addressing.	Noted. Some technical work is currently underway to assess how this important link can be improved.
	The following minor amendments need to be made: Other relevant strategies should include	Noted. Change to be incorporated.

3.0 Development management policies – Summary of Comments		Response
	Gloucester Railway Station Travel Plan January 2016 which I can provide in due course.	
	The city needs a park and ride on the east side of the city.	Noted. This is a matter for the County Council and Highway England. Further information can be found in the Gloucestershire Transport Plan <a href="http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/">http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/</a>
	Lack of disabled parking in the main docks area – eg: Vinings restaurant unusable.	Noted. The Docks is a private space. Comment to be based on to the relevant land owner.
	Making the city more walkable – protecting pavement areas from traffic with on street parking designed between the road and the footway to protect pedestrians.	Noted. Reference to on-street parking to be added to the car parking policy G2.
H1: Sustainable transport	<p>The document identifies poor access to the canal frontage as a key issue along with traffic congestion along some key routes, including Bristol Road. Pleased that the council recognise that improvement needs to be made to ensure that better use is made of the canal towpath as a sustainable transport route. With increasing populations at Hunts Grove and Kingsway the towpath could become a more useful link, particularly if linkages and access to it are also improved and way marked. Improvements to the towpath could of course also help congestion on Bristol Road if more people utilised the canal towpath as sustainable route into the heart of the city.</p> <p>It is clear however that increased usage of the towpath as a sustainable transport route will cause faster degradation and could result in increased maintenance costs for the Trust, however we are currently discussing this issue with the County Council Highways Team and hope that S106 money can be spent on improving certain sections in the future. We therefore support Policy H1: Sustainable transport, but ask the council to recognise that there may be a need for mitigation or improvement must be dealt with by S106 or Cil to ensure that a development does not inadvertently worsen existing provision as a result of increased usage.</p>	Noted. The LPA will await advice from Highways on the requirement for contributions towards the maintenance of towpaths. The LPA will continue to notify the Canal and Rivers Trust on applications in close proximity to the canal.
	Improve rail links to other cities, especially Bristol. At present it is faster by moped.	Noted. This is a matter for Network Rail and the individual train service operators.
	Major bus service route and stop upgrades required throughout Gloucester City with RTPI stops, new shelter and raised kerb stops, as well as footway widenings, upgrades and tactile crossings throughout inner Gloucester and tree and landscape improvements. New and improved pedestrian and cycle canal side continuous routes between city centre and south and north edge of Gloucester. New Cycle Lanes and junction giveaway lines on highway removing footway cycling.	Noted. This is a matter for the County Council and Highway England. Further information can be found in the Gloucestershire Transport Plan <a href="http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/">http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/</a> . The LPA will continue to work with Highways to negotiate contributions to highways infrastructure through the development management process.
	As a regular road cyclist most cycle infrastructure isn't suitable as it is too narrow, too slow, too bumpy etc so I use the normal road network. However certain junctions feel very exposed and	Noted. The LPA will continue to work with Highways to negotiate contributions to highways



**3.0 Development management policies – Summary of Comments**

**Response**

dangerous on a bicycle. In particular I would like to see the simplification of Westgate Road Gyratory and removal of through route between Quay Street and the roundabout to reduce through traffic in the city and make it more cycle friendly. (This will also remove a lot of the traffic from Kimbrose Triangle)

infrastructure through the development management process. We are supportive of improvements to Quay St, Priory Road and Westgate that would significantly improve the pedestrian and cycle network.

The first paragraph is a supporting statement and should be removed from the policy. The first sentence of the second paragraph merely refers to other guidance and is unnecessary to include in a Local Plan Policy.

Noted. Policy to be amended.

Highways England welcomes the opportunity to comment on the Draft Gloucester City Plan (the Draft Plan). We are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which around Gloucester comprises the A40 north of Gloucester and the M5, J11, J11a and J12. It is on the basis of these responsibilities that our response to the Draft Plan is provided.

Noted. The LPA will continue to work with Highways England in the development of the transport evidence base for the CP.

Highways England recently provided a consultation response in respect of the Gloucester City Infrastructure Delivery Plan Project Briefing Pack January 2017 (dated 9 February 2017). It is recommended that the comments provided for that consultation are considered further alongside our comments set out below.

Scope of the Gloucester City Plan

We understand that the Gloucester City Plan (GCP) will cover the administrative area of Gloucester only, to identify where and how new development will take place within the City’s administrative boundary to deliver the City Vision and to deliver the housing and employment requirements set out in the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (JCS).

The Draft Plan outlines that the City Plan will support the delivery of the JCS, which sets the strategic vision for the three authority areas. The GCP will sit beneath the JCS as a separate document but the two will be interrelated.

Paragraph 1.10 of the Draft Plan states:

Together they will provide an up-to-date and comprehensive planning policy framework and will replace the Council’s adopted Local Plan from 1983 and interim versions of plans thereafter... Once adopted, the GCP will be used to assess planning applications and ensure that development proposals contribute to delivering new development that positively contributes to delivering the vision for Gloucester.

**3.0 Development management policies – Summary of Comments**

**Response**

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The JCS sets out the strategic planning framework for the three Councils including the strategic land allocations across the JCS area and high-level development management policies. The City Plan will provide a range of locally specific land allocations covering the remaining housing need within Gloucester (excluding the Strategic Allocations).

City Vision

The locally specific vision for Gloucester is designed to support and expand the JCS Vision, the 3 supporting ambitions and 9 strategic objectives, to provide a planning framework that addresses the local issues in the City. Highways England welcomes the locally-chosen City Vision, although we note that no specific reference is made to sustainable transport or the provision of transport infrastructure within the five key aims. The JCS Ambition 3, strategic objective 7 does seek to provide a healthy, safe and inclusive community by promoting sustainable transport across the three Councils.

Policy Context

The National Planning Policy Framework

The National Planning Policy Framework requires that local planning authorities should work with other authorities and providers during the plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands (para 162).

The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development (para 181).

Pursuing sustainable development requires careful attention to viability and costs. The sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (para 173).

To ensure viability, the costs of any requirements likely to be applied to development, such as infrastructure contributions or other requirements should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (para 173).

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion (para 177).

### 3.0 Development management policies – Summary of Comments

### Response

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe (para 32).

National Planning Policy Guidance

NPPG confirms the importance of local authorities undertaking an assessment of the transport implications of development in preparing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.

The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources.

The key issues, which should be considered in developing a transport evidence base, include the need to:

assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms

assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport

highlight and promote opportunities to reduce the need for travel where appropriate

identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate

consider the cumulative impacts of existing and proposed development on transport networks

assess the quality and capacity of transport infrastructure and its ability to meet forecast demands

identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

The Strategic Road Network and the Delivery of Sustainable Development

Highways England's policy on the delivery of sustainable development is set out in DfT Circular

**3.0 Development management policies – Summary of Comments**

**Response**

02/2013. In framing its contribution to the development of Local Plans, Highways England’s aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network (para 14).

In order to develop a robust transport evidence base, Highways England will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety (para 15).

Highways England’s planning guide entitled “The Strategic road network: Planning for the future” confirms that Highways England will work with local planning and highways authorities to ensure that development plans are underpinned by a robust transport evidence base which fully assesses the transport implications of the growth options being considered (page 17). The guide also sets out how Highways England will work with local planning authorities to identify the impact and infrastructure requirements of development allocations (page 17).

Where necessary mitigation measures are unlikely to be feasible or deliverable within the plan period, Highways England will work with the local planning authority to revise the site selection process taking account of such constraints (page 18).

Gloucestershire’s Local Transport Plan (2015- 2031)

Gloucestershire County Council’s LTP was formally adopted in June 2016. Policy LTP PD 4.5 –Enabling development outlined in Gloucestershire County Council’s updated Local Transport Plan states ‘GCC will work with its partners to provide realistic and safe opportunities for travel choice for residents, employers, and visitors to new developments whilst maintaining the safe and expeditious movement of traffic on the local highway network by prioritising investment which seeks to reduce recurring congestion in line with the Network Capacity Management Hierarchy’. The Network Capacity is detailed within the policy.

The implementation of this policy will secure future development and growth by delivering a local highway infrastructure that does not act as a constraint to unlocking sustainable development and provides safe, reliable and convenient transport choices connected to new developments.

GCP Evidence Base

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**Response**

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The Draft Plan outlines the importance of a robust evidence base on which to base the City Plan and notes that a number of studies relevant to the GCP have been completed as part of the JCS development process.

However, paragraph 1.20 of the Draft Plan identifies that a number of studies required to support the City Plan remain outstanding, including the Transport Assessment and Modelling and therefore there are gaps in the evidence base.

JCS Transport Strategy

Highways England is currently working with the JCS authorities and Gloucestershire County Council (GCC) in developing the transport evidence base and strategy to support the JCS, including the identification of SRN improvement schemes that will need to be included in the JCS IDP.

Our current position in respect of the JCS evidence base and emerging transport strategy is set out within Exam 233 and 233a of the JCS examination library. In terms of the emerging JCS Transport Strategy, Exam 233 provides a list of locations where highway interventions are needed to support Strategic Allocations and states that:

In terms of the SRN, all junctions, with the exception of M5 junction 12, have been identified as requiring improvement in order to enable Core Strategy growth.

For clarity, in terms of the SRN at Gloucester, the JCS evidence base (to date) identifies that interventions will be required on the A40 at Over roundabout, Longford Roundabout and Elmbridge Court to support the Strategic Allocations to 2031. Interventions will also be required at M5 J10, J11 and J11a. At present, the nature and detail of these interventions remains unclear and further clarification should be sought from the JCS team.

Exam 233a sets out that whilst Highways England were broadly content with the available transport evidence base and the emerging transport strategy supporting the Pre-Submission version of the JCS, the recent consideration of new sites for inclusion through the main modifications process means that the implications for the scale and extent of the JCS transport strategy are not yet fully understood.

The JCS team are currently undertaking additional traffic modelling and assessment work to determine the impacts of the main modifications and the implications for the emerging transport strategy. At this time, it is our belief that this additional work could have significant implications for

**3.0 Development management policies – Summary of Comments**

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the shape of the emerging transport strategy, including the need for intervention at M5 J12.

Conclusion and Next Steps

Whilst it is acknowledged that there is a significant interrelationship between the JCS (and associated evidence base) and the GCP, the Draft Plan proposes additional housing and employment allocations in Gloucester, over and above that proposed in the JCS and currently being tested in the JCS traffic modelling.

Evidence will therefore need to be prepared to confirm if additional mitigation, over and above that identified in the JCS will be required to additionally support the site allocations proposed in the Draft Plan. We also understand that GCC Highways is progressing an improvement scheme at the Over Roundabout to help relieve capacity issues on the A40 at peak times. However, it is not yet clear whether this scheme is sufficient to accommodate the future growth proposals set out within the JCS and Draft Plan.

Until such time as the GCP Transport Assessment and Modelling becomes available, it is not possible for Highways England to determine the cumulative impact of the Draft Plan on the SRN and confirm whether the Draft Plan is compliant with NPPF.

In terms of developing a transport evidence base for the City Plan, Highways England would welcome the opportunity to work with you to ensure that the needs of the plan and relevant policy requirements in so far as they relate to the Strategic Road Network are met.

Alney Island can be accessed safely only from one small bridge near the docks lock. An additional pedestrian bridge should be built near the end of Westgate Street.

Follow up on proposal for removing central reservations along Quayside and introducing coach parking. Even if this was a short term measure this would immediately resolve some of the shortages.

Until there are too many electric cars in Gloucester for it to be feasible – shameless favouritism of the electric car. Free Parking with charging point. Use of bus lanes. Because although it is unfair it is also unfair that electric car drivers have to suffer the effects of other drivers air polluting cars.

Noted.

Noted. There is ongoing work underway to assess the current and future parking needs for the City.

Noted. The LPA recognises that more could be done to promote the use of electric cars, especially as the city has three AQMAs. Air pollution is a local, national and international environmental and health concern. An Air Quality report is currently being drafted by the council and will be available in due course. More information with regard to air pollution can be found at <http://www.gloucester.gov.uk/resident/pests-pollution-and-food-hygiene/pollution/Pages/Air->

3.0 Development management policies – Summary of Comments		Response
		<a href="#">Quality-in-Gloucester.aspx</a>
I: Infrastruct ure	We welcome the inclusion of flooding infrastructure in this section. We are not sure of the current situation that the Council is at with regards to the specific projects mentioned (Blackfriars; Quayside flood alleviation; Housing Zone), and it may be worth re-visiting these before finalising the Local Plan wording. Policy I1 makes comment on new flood defence infrastructure within the city, there may also be the potential for the removal of, or adjustment to, historic infrastructure (such as redundant structures, old railway lines, etc) to provide wider benefits to the area of Gloucester.	Noted.
	The words 'flood defence infrastructure' should be changed to food risk management infrastructure, as this can include 'hard' defences, but also 'softer' options such as property level protection, conveyance and storage schemes, and flood warning systems including the gauges needed to support them.	Noted. Change to be incorporated.
	<p>Allocations: We would seek confirmation of what evidence base sources/ data sets have been used when considering site allocations. We would expect flood risk to have been taken into account (see comments on evidence base and Level 2 SFRA), but in addition the sites should have been 'sifted' for environmental constraints including:</p> <ul style="list-style-type: none"> <li>• potential land contamination (such as former/historic landfill sites, sites with Environmental Permits for waste activities, and consideration of proximity to railways/roads where construction of the infrastructure may have resulted in tipping of soils/waste historically),</li> <li>• presence of watercourses including culverted watercourses, groundwater sensitivity (i.e. aquifers; there are no Source Protection Zones in Gloucester, but there may be private abstractions potentially),</li> <li>• the presence of Permitted sites/activities (under the Environmental Permitting Regulations) such as industrial processes that might affect amenity,</li> <li>• the status of waterbodies under the WFD. (Incidentally all river water bodies in Gloucester are not currently meeting the required 'good' status of the WFD as they are at 'moderate' or lower. Thus they require improvement and opportunities to do this through development should be sought.)</li> </ul> <p>Of the allocation sites proposed, the following are the only ones with fluvial flood risk issues attached to them. (Please consult with the Lead Local, Flood Authority – LLFA – regarding other sources of flooding such as surface water or groundwater flooding.)</p>	Noted. The allocations were sifted for constraints. Detailed heritage assessments were completed on a number of the sites. Further evidence will be gathered prior to the next version of the CP. This will include the completion of SFRA Level 2 across all sites.
	Support infrastructure and not just wanton development.	Noted.
	Relevant National Planning Policy Framework paragraphs should also include: Chapter 1, 4, 5 and 7. Relevant policies from the JCS should also include: SP2, SD1, SD4 and SD5.	Noted. Changes to be incorporated where appropriate.
I1: Infrastruct ure	When planning for new settlements, the Council should ensure that they work with NHS commissioners (Gloucestershire CCG & NHS England) and providers to ensure that adequate healthcare infrastructure is provided to support new residential development.	Noted. This does already happen. Officers have met with representatives of the GCCG at all stages of the plan making process.

**3.0 Development management policies – Summary of Comments**

**Response**

Page 56	<p>Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The Council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable.</p> <p>Where new, improved, or extended health facilities are required to mitigate the impact of new development, health commissioners would require Section 106 / CIL funding towards the capital cost of delivering this infrastructure. An assessment of the appropriate mechanisms for delivering the required funding will need to be undertaken at an early stage in collaboration with the Council.</p>	<p>Noted. Officers have met with representatives of the GCCG at all stages of the plan making process. We have encouraged the NHS to provide details of their future spatial requirements but it has not been possible for them to provide us with this information. Unfortunately the commissioning of health care does not appear to be forward planned in the same way as the planning process. GP practices/dentist etc appear to rely on private individuals stepping forward to begin a practice. They are not actually built in advance by the NHS, but rather run more like private businesses.</p>
	<p>Improvement of Gloucester Railway Station and perhaps (very long term) introduce tram-trains to improve linkages between Gloucester and Cheltenham. Much of the formation of the Golden Valley Line was 4 track and thus there is space to provide 2 further tracks. On and off-road running would be used to complete the network. A full aspirational route could run from Quedgeley through to Pittville Area in Cheltenham</p>	<p>Noted. This is a matter for Network Rail and the individual train service operators.</p>
	<p>Concern that the infrastructure requirements arising from new developments are properly considered and addressed, particularly highways, schools and healthcare.</p>	<p>Noted. We have an open dialogue with the NHS and the Local Education Authority. We have offered to accommodate their needs for future expansion of services with in the plan. However they operate on reactionary basis rather than a forward planning basis. This is partly to make best use of resources. It would for example be a waste of money to build a primary school in advance of having a population ready to occupy that school. A new development may not generate enough children to support a school or the children may not be a primary age etc. The LPA will of course support applications from education and health providers that comply with the local plan policies.</p>
<p>I2: Schools and other educational needs</p>	<p>Any sports and play areas should be accessible for disabled children and young people and include play equipment suitable for disabled children and include a Changing Places toilet and changing space in sport/ leisure development (see below).</p> <p>Thousands of people with profound and multiple learning disabilities, as well other disabilities that severely limit mobility, cannot use standard accessible toilets.</p>	<p>Noted. Consideration to be given to expanding the policy.</p>



3.0 Development management policies – Summary of Comments		Response
Page 57	<p>People may be limited in their own mobility so need equipment to help them or may need support from one or two carers to either get on the toilet or to have their continence pad changed.</p> <p>Standard accessible toilets (or "disabled toilets") do not provide changing benches or hoists and most are too small to accommodate more than one person. Without Changing Places toilets, the person with disabilities is put at risk, and families are forced to risk their own health and safety by changing their loved one on a toilet floor. This is dangerous, unhygienic and undignified.</p> <p>It is now accepted and expected that everyone has a right to live in the community, to move around within it and access all its facilities. Government policy promotes the idea of "community participation" and "active citizenship," but for some people with disabilities the lack of a fully accessible toilet is denying them this right.</p> <p>Although the numbers are increasing, there are still not enough Changing Places toilets across the country, and Gloucestershire has very few at all.</p> <p>Providing these toilets in public places would make a dramatic difference to the lives of thousands of people who desperately need these facilities. Information on Changing Places can be found here: <a href="http://changing-places.org/">http://changing-places.org/</a></p>	

Site Allocations - Comments		Response
General comments	It was raised that 'site specific requirements' should be changed to read 'site specific requirements subject to viability'.	Noted. Consideration to be given to suggestion.
	The delays to the adoption of the JCS could jeopardise the City's housing land supply provision, therefore sustainable developments within the City boundary, especially those identified as an emerging allocation in the City Plan should be actively encouraged and supported by the Council, to ensure that housing provision is being delivered to meet local housing need.	Noted.
	Some of the sites included appear to have significant constraints in terms of being playing pitches or archaeology. The council's assumptions about the suitability, availability and deliverability of allocated sites are not robust.	Noted. Constraints have been considered and further evidence gathering is underway on some sites.
	The GCP includes a significant number of allocations that will have a direct and indirect impact	Comprehensive historic assessments have been

Site Allocations - Comments

Response

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on the significance of national, known and unknown, designated and undesignated heritage assets. Mindful of the national importance of historic Gloucester, can the GCP include site specific safeguards in the form of key design principles.

Relevant national heritage policy considerations include, that:-  
 Great weight should be given to the conservation of heritage assets (NPPF Paragraph 132);  
 Special regard must be given to desirability of preserving the setting of a listed building in the exercise S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990) and S72 re Conservation Areas;  
 Development will be expected to avoid or minimise conflict between any heritage asset’s conservation and any aspect of the proposal (NPPF Paragraph 129);  
 Harm should always be avoided in the first instance. Only where this is not possible should mitigation be considered (NPPF Paragraph 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm.  
 That the strategic allocation is consistent with the GCP’s positive strategy for the conservation and enjoyment of the historic environment; conserving heritage assets in a manner appropriate to their significance (NPPF paragraph 126).

Can the City Council make available the Historic Environment Assessments of the proposed site allocations and be able to demonstrate that the allocations would be in accordance with national policy for the historic environment i.e. the allocations and the related critical key design principles will result in the conservation (protect and enhance) of the significance of the affected heritage assets and a coherent historic city/townscape?

As decisions will be expected to be made in accordance with the development plan it will be vital for the city council to demonstrate that the quantum of development (numbers and floor area) in the proposed allocations is compatible with its design and heritage policies, and that national policy expectations can be met.

Error or colour on plan. Employment commitment at Monk Meadow should be coloured as residential as per the outline renewal 14/00709/FUL

It has been requested that the Proposed Site Allocation Plans be updated to remove the Sainsbury’s store car park at Gloucester Quays from any ‘allocation’ or ‘commitment’ shown in this area.

The Twigworth strategic site does not seem to feature on the Proposed Site Allocations Map even though its contribution has been included in the City Plan’s housing supply calculations. For completeness and to afford consistency with the depiction of other strategic sites,

completed on the majority of sites. These assessments are available on the website.  
<http://www.gloucester.gov.uk/resident/planning-and-building-control/planning-policy/Pages/Evidence-Base.aspx>

Heritage policies have been drafted in accordance with the NPPF.

Noted. These assessments are available on the website.  
<http://www.gloucester.gov.uk/resident/planning-and-building-control/planning-policy/Pages/Evidence-Base.aspx>

Noted.

Site allocations plan to be amended.

Site allocations plan to be amended.

Noted. All neighbouring JCS strategic sites to be added where they are contributing to Gloucester’s housing need.

Site Allocations - Comments		Response
	Twigworth should be added to the map as a proposed JCS strategic allocation.	
	Whilst my Client supports the identification of the entire land holding at Winneycroft Farm as a JCS strategic allocation on the emerging City Plan Proposals Map, the table provided at para. 4.10 should be amended to list the contribution of each strategic allocation is envisaged to make to meeting the City's objectively assessed housing need. Such a modest amendment would provide a more positive planning framework for the strategic allocations to be brought forward, in the event that the JCS's adoption continued to be protracted.	Noted. Not deemed necessary.
	Extant permission at Peel Centre for retail should be included as a commitment inline with the approach uses for residential commitments.	Noted. Employment commitments to be added where appropriate.
Supply	There was some confusion raised over the housing supply position as the plan states housing land supply at 13,393 against the 14,359 set out in the JCS. How will this shortfall be met?	<p>The shortage is identified in the JCS Housing Implementation Strategy (HIS). The latest version with appendices and associated documents is available via the link below.</p> <p><a href="http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx">http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx</a></p> <p>Through the JCS Examination Hearing Sessions on the responses to the Proposed Modifications (which commenced on 11<sup>th</sup> July) the Inspector will come to a view as to the acceptability of Gloucester's shortage and the actions (over the full plan period) to meet the targets set on the basis of need.</p>
	You would like to see a much clearer break down of the housing supply for the City, including the contributions of site allocations to ensure that the plan is transparent and robust and will sufficiently deliver the identified housing need.	Noted. This will be addressed.
	The proposed allocations should deliver 1,937 dwellings in order to fulfil this need	Noted. The 1,937 figure in Table 1 ( City Plan Page 79) has an asterisk against it and a full explanation is given as to the reduction from 1,937 to 1,360; the main reason being that a number of large sites that were potential allocations recently got planning permission and so are now recorded as commitments in the trajectory. This process and all the figures are fully explained on pages 13 to 16 of the City Plan Topic Paper 3: Development Needs &

Site Allocations - Comments		Response
	Concern that the windfall prediction is ambitious.	Site Allocations. Noted. The anticipated windfall allowance is in line with the agreed JCS methodology. The LPA are doing all it can do identify and allocate as many suitable, available and achievable sites as it can to meet the housing need.
Page 60	SA01: Land at the Wheatridge	Concerns at the loss of public open space and valuable greenspace.
		Concerns about the loss of open space/recreational facility. As well as concerns over the impact on the traffic flow on the junction of Wheatridge East and the Wheatway, along with the associated noise and environmental issues.
		Preferred option for a School to be built (not mentioned in the plan)
		Loss of nature corridor and a bridleway
		Support development at the Wheatridge – it is currently a big dog toilet.
SA02: Barnwood Manor, Barnwood Road	This open space must be kept for the peace of elderly inhabitants close by, and the proximity of the listed building would spoil its setting.	The site is owned by the County Council and is not a public open space. Access to the site could be controlled by the owner at anytime.
	Barnwood Manor – Wotton Brook – FZ3 & 2. Provision of an appropriate easement either side of main-river not mentioned in the constraints	The site is privately owned by the county council and is not public open space. Highways, noise and environmental issues will be assessed through the planning process. In the meantime the City Council has instructed a refresh of the Phase 1 Habitats Survey.
SA03: Gloucester Mail Centre, Eastern Avenue	Site is potentially suitable for a wider range of uses than is currently proposed and that the draft accompanying wording to the allocation is overly restrictive. It is suggested that the accompanying wording is amended to read: “The site offers the opportunity for redevelopment in whole or in part to provide for different forms of employment-generating	Page 83 of the CP sets out the option for educational use. These issues would normally be addressed through any planning application process. Green infrastructure will need to be an important consideration. Noted.
		Noted. These issues would normally be addressed through any planning application process. Policies are in place to protect amenity and heritage assets where appropriate.
		Noted. Constraint and requirement to be added.
		Noted. B uses are suggested as the site is not deemed suitable for residential use or town centre uses. Planning applications for other uses would need to be subject to a sequential test in accordance

Site Allocations - Comments		Response
	uses (B use and non-B use classes).”	with the NPPF and are unlikely to be supported.
SA04: Helipebs, Sisson Road	In support of the proposal subject to there being alternative industrial land available for relocation.	Noted.
	Would take away the problem of articulated lorries using Sisson Road along a narrow residential street.	Noted.
	Existing employment sites should be retained until it can be robustly demonstrated that they are surplus to requirement, this has not been done.	Noted. Further work is being undertaken on Gloucester’s employment provision. This emerging evidence base will be used to assess whether or not the site should be protected for employment or allocated for residential.
	Loss of the adjoining site to residential development could stifle the expansion of neighbouring company and limit future job creation and may ultimately lead to a move away from Gloucester.	Noted. Further work is being undertaken on Gloucester’s employment provision. This emerging evidence base will be used to assess whether or not the site should be protected for employment or allocated for residential.
	Contamination is likely to be a significant factor, as is proximity to railway line.	Noted.
SA05: Allstone site, Myers Road	Nothing about the likelihood of an alternative site being found for the existing use. A much greater degree of certainty about the availability of Site SA05 is required.	Noted. The owner of the site has submitted it to the CP process as being available for development. They have not asked the CP process to assist them in finding, or in allocating them a new site for their current use.
	Concerns about the suitability of the site for residential use because of potential problems of noise and vibration.	An appropriate noise survey would normally be required as part of the planning application process. This allows for appropriate mitigation to ensure that noise levels within properties are of an acceptable level.
	This is an ideal site for 250 dwellings, which I support. The current industrial uses are inappropriate in an urban environment close to residential properties, the hospital and a primary school. The change of use would reduce noise and dust pollution and also remove the heavy vehicle movements that take place along Horton Road.	Noted.
	Allstones, Myers Road – Wotton Brook - within 8 metres of main-river, opportunity for floodplain creation to further minimise flood risk to development opposite again these are not included within the constraints for the site.	Noted. Constraint and requirement to be added.

Site Allocations - Comments		Response
	We would also highlight aspects to consider regarding potential land contamination for Allstones, Myers Road – waste site that may have given rise to contamination.	Noted.
SA06: Former Civil Service Club off Estcourt	The Council are currently considering a planning application for this site (application reference 16/00968/FUL) which proposes to deliver 89 dwellings, on-site Public Open Space and a financial contribution towards off-site playing pitch provision.	Noted.
	The Partnership supports in principle the Council’s aspirations for this site in terms of the number of dwellings and the balance of land uses. However, the Council’s approach must be realistic. We think that the future of the site is more likely to be determined by the planning application process than by the development plan process. At the time of writing we do not know when the current application by Redrow Homes will be taken to Committee, but independently of that we have already reached the point where the applicants could lodge an appeal against non-determination if they so wished. In addition, the final clause in the last sentence of the site description and overview is wholly inconsistent with the proposed allocation and the site-specific requirements. For this reason, the approach to this site is inadequate even if there were no planning application awaiting determination.	Noted. Whilst the site allocation does vary from the current application it is important to note that the allocation considers the fact that the site is currently private playing fields. To allocate the site for a quantum of development to match the application would be inconsistent with the council’s policy to protect the provision of playing fields.
	Even if the Council’s view on the amount of residential development prevails, the City Plan gives no indication of the disposition of development on the site. This will no doubt be a source of concern to those whose properties adjoin it.	Noted. The nature, style and design of the site would be a matter for the owner of the site to submit to the council as part of the planning application process. Policies are in place nationally and locally to ensure that schemes such as this are designed in such a way that they protect the amenity of local occupiers and the character of the area.
	The description refers to the (former) access off Estcourt Road but says nothing about the appropriate location of an access to serve the proposed dwellings. This is a significant omission. We therefore object to this policy/proposal as depicted on the Proposals Map on the grounds that it does not show the disposition of proposed uses on the site. More generally, the Plan should contain individual maps at larger scale for all of the larger proposed allocations where more than one use is proposed.	A local plan would not normally specify detailed design or access arrangements for site allocations of this nature. In the majority of cases this is a matter for the developer to initiate after giving due consideration to the site constraints. The planning officers and specialist consultees would then scrutinise the submitted evidence, provide a professional opinion and then negotiate matters to ensure the best possible outcome for the site.
	Maximum number of dwellings (20) is a suitable maximum. Concerns at loss of public open space if this number were to be raised. This is former sports playing field and the rest of land should be retained for sport and recreation.	Noted. This is the current suggestion in the CP.

Site Allocations - Comments		Response
	Strongly support new open space with formal sports provision and neighbourhood play area for children.	Noted.
SA07: 67-69 London Road	We hope that the Plan means what it says and that redevelopment does entail demolition and rebuilding, so that a building of a quality appropriate to a Conservation Area will result. We are willing and able to assist the Council in the production of a development brief for this site which would have the status of a Supplementary Planning Document. In the meantime we raise an objection to this policy/proposal on the grounds that it makes no reference to a requirement for a development brief	Noted. The offer of assistance to produce an SPD for this site is appreciated. However resources are simply not available for the council to produce SPDs for individual sites, especially sites of this nature that are relatively small in scale and lacking in complexity redevelopment issues. We would however support the community in any positive engagement they are willing to undertake in order to deliver appropriate development on this site such as a Neighbourhood Development Order.
	Support for the demolition and conversion of these buildings for residential development. Thirty dwelling units would be ideal. The council should consider using Compulsory Purchase Powers to deliver such a project if negotiations fail to achieve development. The property is in a conservation area.	Noted. The council are not in a position to be able to compulsory purchase a site of this nature. CPO are used only in extremely special circumstances and usually to bring together much larger and complex sites or major infrastructure that could not progress without a CPO in place. The council would provide the necessary support the community should they wish to exercise their rights under the Localism Act to produce a 'Community Right to Build Order'.
SA08: Wessex House, Off Great Western Road	The Plan should be clearer about its likely use. Connectivity to the city centre cannot reasonably be described as poor simply because the adjacent underpass is unattractive. If however the redevelopment of this site offers the opportunity for the permanent improvement of the underpass, this should be taken.	Noted.
	Concerns about the suitability of the site for residential use for reasons of potential problems of noise and vibration	Noted.
	Strong support for redevelopment and of improvements to the station underpass.	Noted.
SA09: Great Western Road Sidings	Requires a development brief, as it is a key gateway to rail travellers.	Noted.
	The constraints for this site should include biodiversity. It is known from previous developments here that biodiversity is a major issue.	Noted. Further work to be undertaken on biodiversity.
	Strong support for University Technical College and major improvements to station underpass.	Noted.

Site Allocations - Comments		Response
SA10: Land off Leven Close	Should be allocated for 10 rather than 20 dwellings, want to see the maximum amount of open space left for the public to enjoy.	Noted.
	This site should be retained as a playing field. Access off Paygrove Lane may cause a traffic hazard very close to the infant's school.	Noted. The owners of the site has stated through the SALA process that they wish to develop the site. Gloucester has a shortage of housing and must consider all available sites to help contribute to meeting that housing need. Highways England will be consulted on any planning application and will look at highway safety.
SA11: Land adjacent to St Aldates	This community facility must be kept, and the parking availability is essential, as is retention of trees <i>[and]</i> open space.	Noted.
SA12: Blackbridge Sports Hub  Page 64	Public access must be maintained, and a large area set aside for dog-walkers.	Noted.
	The Crypt School is currently at advanced planning for the development of a primary school with two classes per year. There are two sites identified for the potential construction of the new school. One is within the current grounds and the other is on site 12, Blackbridge. If the school is built within the current grounds of the existing Crypt School there will be a loss of playing fields which potentially will need to be replaced to comply with Planning Policy Guidance 17: Planning for Open space, Sport and Recreation and Sports England Guidelines.	Noted.
	Recommendation: References to the sports hub in City Plan acknowledge and explicitly state the need for any such sports hub to have shared usage with the Crypt school.	Noted. It is not considered appropriate to include this level of detail in the planning policy.
SA13: Land East of Waterwells Business Park	There was support for the allocation of this site for residential use.	Noted.
	It was suggested that the text should state that the proposed employment uses within the allocation should only be brought forward if compatible in amenity, design and environmental quality terms with the adjacent residential allocations to the south.	Noted.
	It was also suggested the policy text associated with proposed allocation SA13 should be amended to remove the existing reference to '150 dwellings' as it implies a fixed marker. This will, however, need to be informed as a result of detailed design considerations. However on the face of it a total figure of 150 dwellings over 6 hectares appears to be reasonably low for this location (circa 25 dph), especially noting that initial draft layouts on the western parcel indicate scope for over 35 dph on the 3.1 hectare land parcel. It is therefore considered that reference should be made to a greater figure than 150 dwellings, subject to further site	Noted. 150 is an indicative figure and a fairly conservative estimate. The SALA estimates 150 to 200 on this parcel. The LPA would welcome an appropriate figure from the landowner/agent based on an initial layout and design considerations.



Site Allocations - Comments		Response
	capacity and technical constraint review' within the policy text.	
	Further clarification was sought with regard to the split of on-site provisions of POS etc across the various parcels.	Noted. This will be in accordance with the relevant SPD. The split will need to be determined through the pre-app or application process.
	It was noted that none of the site, according to EA's Flood Map and the Council's Strategic Flood Risk Assessment Level 1, actually lies in the Flood Zone 2 &3 so the reference to flooding as a constraint should be removed.	Noted, this has been checked and this constraint will be removed.
	Consideration to be given to Dimore Brook Ordinary Watercourse.	Noted.
SA14: Clearwater Drive	New schools in Quedgeley should be built to the east of the A38 Bypass and not at this location. The land should be considered as formal public open space.	Noted. The land is in private ownership and is not public open space. It is not possible for the LPA to allocate privately owned land as public open space.
SA15: King's Quarter  Page 65	The central King's Square must be an open, green space with seating as a relaxing hub in the middle of a busy shopping, restaurant area with accommodation above the units.	Noted.
	Strong support for the King's Quarter regeneration project, including the new bus station. Concern that progress seems to have slowed and that it might not happen at all.	Noted. Updates on the progress of the bus station redevelopment are available on the City Council's website. Progress is currently as expected and due to complete on time in Sept 2018.
	Kings Quarter – River Twyver – culverted watercourse not included within the constraints – opportunity to open up this section of culvert should be taken.	Noted. Constraint to be included.
SA16: Greater Blackfriars	It is noted that Table 2 identifies site SA16 would deliver in the order of 50 dwellings. This would appear to be an error and should have referred to 400 dwellings.	Noted. 400 is the correct figure.
	River Severn – Flood Zone 3 & 2 – depending on details this site may not correspond with the policy principles set out within the Draft Local Plan.	Noted. More details to be sought from Environment Agency on this matter.
SA17: Southgate Moorings	We would wish to ensure that any proposed development properly considers the impact on the moorings by virtue of noise, overshadowing, overlooking and amenity issues.	Noted. These issues would be assessed through the planning application process.
	Evidence gathered identifies this as the ideal place for a city centre iconic multiuse venue for performances, conferences and exhibition. Evidence shows that capacity should be 1200 seating with 1800 standing in order to be sustainable. Ground floor facing Paju walk should consist of bars and restaurants. There is also possible space for a 120 room 4 star hotel to go alongside.	Noted.
SA20: Land at St	The plan should be amended to include commitments identified by the JCS retail study 2011-2013. As follows: 'redevelopment to provide for 4683m2 of comparison floorspace and	Noted.

Site Allocations - Comments		Response
Oswalds	4733m2 of convenience floorspace'.	
	Please revise policy to ensure that all provision of public open space is on site. There is a lack of green space on the current development and this does need to be addressed.	Noted.
	Support for the redevelopment of land to the rear of Tesco for residential.	Noted.
	Requirement for disabled access onto the neighbouring open space should be sought.	Noted.
	Consideration to be given to River Severn/River Twyver – Flood Zone 2 and site within 8 metres of main-river.	Noted. Constraint and requirement to be added.
	We would also highlight aspects to consider regarding potential land contamination for Land at St Oswalds – historic landfill and complex arrangements in place through previous planning applications to ensure drainage pipes do not exacerbate contamination issues.	Noted. Noted. Constraint and requirement to be added where appropriate.
SA21: Former Town Ham Allotments, off Westend Parade	Consideration to be given to River Severn – Flood Zone 2.	Noted.
SA22: Secunda Bay Industrial Site	No further infill here, as too close to existing properties and is too close to Hempsted village.	Noted.
SA23: Rea Lane	You suggested that this site should be removed from the NIA designation.	NIAs are not designated through the CP. They are 'recognised' by the Local Nature Partnership. As such the CP can not remove sites as a NIA. NIAs are not strict barriers to development. They are priority areas offering good opportunities for ecological network restoration and improved habitat management. This work can sometimes be realised through the development management process.
	Requirement for a Phase 1 Habitat Survey and Landscape Assessment for this site.	This has previous been undertaken on behalf of the council and again as part of a submission to the council.
	Confirmation that the land is available for development and can be delivered in 5 years. Application for 30 dwellings submitted (allocated for 35). Delivery at maximum density may be challenging.	Noted.
	The site (SA23) assists in making the City Plan more legally compliant and sound than it would be without the allocation, but the concern nevertheless is that plan is unsound due to lack of	Noted.

Site Allocations - Comments		Response
	flexibility.	
Site submissions for consideration	Promotion of Winnycroft Lane	Noted.
	Promotion of 'Land at Mill Place' as allocation	Noted.
	Submission for consideration of land at Snow Capel farm	Noted.
	Submission for the consideration of Land off Rudloe Drive to be considered for residential instead of employment in order for the city to meet its five year land supply.	Noted.
	Submission for consideration Land off Forest View Road Tuffley, on behalf of Terra Strategic Ltd	Noted.
	Request for Land south of Grange Road to be considered as an allocation rather than commitment	Noted.
	Request allocated sites to include new residential dwelling site to brownfield site at corner of Cecil road and Wilton Road in Linden, Gloucester.	Noted. This site is too small to be considered for an allocation. The suitability of this site for residential can be discussed through the Pre-application or planning process.
	Other possible site for housing in the Kingsholm & Wotton County Division. 1. The bus depot in London Road would make an ideal site for housing and would be planning gain within a conservation area. 2. The former gas-holder site on Horton Road would also be good for housing as would be the 2Together land between the Aspen Medical Centre and the petrol station on Horton Road	Noted. The bus depot is operational and not available for other uses. The former gas holder site on Horton Road is not likely to be suitable due to land contamination, but National Grid have been contacted to get confirmation and further information. The NHS have been contacted on previous occasions regarding their land holdings and have not indicated that the land between the Aspen Centre and the Horton Road petrol station is available. 2gether NHS Foundation Trust will be contacted again as part of the annual SALA call for sites.
	Promotion of the Peel Centre and Land at Madleaze Industrial Estate. The Peel Centre has the potential to deliver up to an additional 16,000 sq m gross retail floorspace over the next 15 years in addition to the commitment of 9,518 sq m gross). In respect of the Madleaze Industrial Estate part of the site, this has the potential to provide up to 480 dwellings over the plan period.	Noted.
	Promotion of intensification of Westgate Retail Park.	Noted.

Site Allocations - Comments	Response
	Promotion of Gloucester Golf Course – custom build community
	Noted.

**HRA & SA - Comments****Response**

Habitats Regulations Assessment (HRA) para 3.15 & Appendix IV – it could be questioned whether increased development in Gloucester could actually result in significant increases in recreational disturbance on the Cotswolds Beechwoods but particularly the Severn Estuary which has features which are more susceptible to such an effect. Reference in the next version of the HRA to the findings of the recent Stroud District Study would be useful as the draft City Plan progresses with more firmed up site allocations and the HRA is updated. The Severn Estuary Visitor Study can be found at <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/evidence-base/environmental-evidence>.

Noted. Growth in the CP will not exceed the levels of growth expressed and tested through the JCS process. The JCS has set the overall level of growth and a HRA was undertaken during its preparation. The HRA screening of the JCS found that for 12 of the 13 identified European sites there would be no significant effects, although there was some uncertainty regarding the in combination effects on 7 European sites as a result of changes to Air Quality, Disturbance and Water Levels & Quality. There was also uncertainty around the significant impacts that short range atmospheric pollution might have on the Cotswolds Beechwoods SAC. Therefore, an Appropriate Assessment (AA) was undertaken to gain a more detailed understanding of the possible significant impacts which may occur. The AA made a number of recommendations to ensure potential impacts on European sites did not occur, including conducting a transport assessment and a water cycle study, and strengthening the flooding policy. Overall the HRA concluded that with consideration to the recommendations provided, the Draft JCS would not have significant alone or in combination effects on the integrity of the identified European sites. There was some uncertainty raised during consultation and examination by Natural England regarding the potential recreational impacts on the Cotswolds Beechwoods SAC and proposed mitigation measures. However, this has now been resolved through a HRA Addendum Report8 (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and Natural England. No further concerns on the HRA have been raised during examination of the JCS and therefore, it can be concluded that the strategic development

HRA & SA - Comments		Response
Page 70		proposed for Gloucester in the JCS will not have adverse effects on the identified European sites.
	The Sustainability Appraisal sets out in Table 2.1 a SA Framework, but this is not used to develop a framework to appraise each policy individually or each allocation in detail. Instead Section 5, the Integrated Appraisal of the Plan provides only a prose description of the impacts on policies, site allocations, cumulative effects and interrelationships. I would be grateful if you would take the above comments into account in progressing the Gloucester City Plan and keep Persimmon Homes Severn Valley informed of its progress.	Noted. Comment to be addressed through next iteration of SA.
	GCP Sustainability Appraisal (2013): Making better use of the waterways and river corridors, including improving flood mitigation and biodiversity resources. H&GCT would have preferred that the scheme was mentioned in the GCT so that it can gauge both public opinion and inform others of the plans	Noted.
	Land at Mill Place and Land off Rudloe Road have not been subject to Sustainability Appraisal by the DGCP. It is submitted that for the next round of DGCP public consultation that both the submitted sites, Land at Mill Place and Land off Rudloe Drive, should be the subject of SA and should be included as sites that have the potential to deliver against the City's housing requirement in the plan period 2011-2031.	Noted. Any new potential allocations will be subject to SA.
	There is lack of clarity over what document the policy is seeking to implement, either the Gloucestershire County Council Green Infrastructure Plan or the JCS Green Infrastructure Strategy. Also we note that neither document is identified in the Sustainability Appraisal list of key plans and programmes.	Noted. Clarity to be provided and relevant documents to be included.

General Comments	Comments	Response
Delivery	Concern was raised over the absence of detail of how the plan will be delivered, in terms of human resources and funding.	Noted. The council is in the process of transformation. An independent review of the planning service and its resources is underway by PAS.
Notification	You would like to have good notification of applications on newly submitted sites.	All applications will be notified on in accordance with the approved....
Pipelines	We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline.	Noted. Consultation is sent for any planning applications in the buffer zone of the pipeline.
Site Allocations	Site allocations should say “Provision of public open space” rather than specifying “play area” etc.	Noted. This will be amended.
Progression of the plan	Concern was raised over the progression of the plan stating that this must be synchronised with the JCS to avoid the risk of undermining the CP.	The council will continue work on both plans and will prioritise the progression of the JCS as the strategic plan for the area. The work and progress on the CP will not overtake the JCS.
Style Page 71	Concern that the plan has been written by a number of experts and it needs further editing in order to read as one document with one voice.	Noted. This is a first draft. There is a much more editing and work to be undertaken before a final version is reached.
	Some policies have bulleted lists, other numbers and some don't have anything.	Noted – the next version will have consistency
	Label photographs	Noted – labels to be applied.
Monitoring	You have recommended that the impacts of the Plan on the City's biodiversity resource are monitored.	Noted.
	The Woodland Trust believes that levels of tree cover and woodland protection and creation could be used as key indicators for monitoring the success of the Gloucester City Plan. Gloucester City Council currently has a woodland cover of just 4.1%, with just 4.57% of the local population having accessible woodland within 500m of where they live (Woodland Indicators by Local Authority, July 2016). To achieve its stated objectives of maintaining and enhancing its tree stock, and protective and enhancing its natural environment, these figures could be used as benchmarks for monitoring purposes to demonstrate success.	Noted.
Further evidence base	At the time of writing this representation the City's Economic and Employment evidence base report, to be prepared by Athey consultants has not been published. Pegasus Group, on behalf of Robert Hitchins Ltd, reserve the right to make further representation on the Athey report once it is published if it is to comprise part of the evidence base for the DGCP.	Noted. The LPA will not be consulting on individual pieces of evidence base work. There will however be an opportunity for all interested parties to comment on the CP as it continues its progress through the plan making process.

Other public comments received at consultation events on post it notes –comments relating to specific policy areas or sites have been included in the relevant table above.	Response
Concern at proposed developments at Highnam.	Highnam does not form part of the City’s administrative boundary and therefore outside of the council’s control. The LPA continues to work with neighbouring authorities under the established DTC.
Frustration at the lack of adoption of Longhorn Avenue to the rear of St Oswalds retirement village. It lacks accessibility for older people on mobility scooters because there are no ramps.	Policy team have followed up with County Highways and Asset Management.
Concern regarding the increasing number of homeless people that are on Gloucester’s streets.	Members of the public can refer people they believe to be homeless to P3's outreach team, through <a href="http://www.streetlink.org.uk">www.streetlink.org.uk</a> , downloading the free Streetlink app, or calling 0300 500 0914. All reported homeless persons will be visited by an outreach worker. If you are homeless in Gloucester, you can approach the City Council for housing advice and assistance. Roofless persons who are eligible, unintentionally homeless and in priority need will be offered emergency accommodation. Information is available online, at the Docks, or from a number of independent organisations.
Abbey needs a new community facility or a refurbishment of the existing.	Noted. The upkeep of the building is something that the community will need to explore and work together to achieve. The CP is facilitative of those wishing to develop needed community facilities.
Derelict sites should be forced to pay more taxes to encourage them to be redeveloped. If a site is derelict for 5 years extra charges should apply or the property should be subject to CPO.	
An incentive to give people benefit of the council’s experience of hearing from people who are disappointed with their new build houses. Getting people to think about the drawbacks to parking areas and tiny gardens and no front gardens.	Noted.
More underground car parking outside of the inner ring road.	Noted.
Councillors need to establish their priority list.	The Council are in the process of producing a new Council Plan that will outline its priorities.
Getting the consumers association to investigate the quality of new build houses – standard of insulation. Quality of fittings and finish. Get them to inspect more than 1 in 10 houses for compliance with building regs.	Noted. Officers at public events received complaints about the quality of new build houses. Consumers are concerned that not all new homes have the required levels of insulation. 10 year warranty
B4073 chronic speeding that needs to be addressed.	This is a matter for Gloucestershire Constabulary and County Highways.
What can the council do to increase incentives to develop brownfield rather than greenfield sites?	The Council is required by central government to produce a Brownfield Register by the end of the 2017. The second part of the register will grant planning permission in principle. The Council’s



	Place Team continues to work with land owners to encourage the redevelopment of brownfield sites. The Homes and Community Agency are actively
Safe areas – there is a need for an enclosed lit area for dog owners to exercise their dogs within the city centre.	Noted. Idea passed to parks team.
Abbeymead Avenue needs a bus lane. Has been promised but not delivered. The layout is currently breaking the law.	This is a matter for County Council Highways.
Clock Tower park – nature reserve – what is happening? Badgers and foxes being driven out.	This is not a designated nature reserve. The area is fenced with an open fence to allow for the movement of wildlife. There is no planned development for this area.

Typos	All noted and will be amended.	Amended by
Para 2.5 to 2.30	typo in (16) Gloucester Playing Pitch Strategy 2015 - 2015 should read 2015-2025	
Page numbers	Add page numbers to policies	
Environment policy	Missing 'be' – "RIGS will be re-sited unless it can be shown"	
Environment policy	RIG should be corrected to RIGS	
	Inconsistent paragraph numbering – 1,2,3/ a,b,c etc across policies	
Page 81	Page number missing	
Page 65 & 73	Manual for Streets should it be 2014 or 2016 – inconsistent.	
Glossary	Add RIGS definition 'Planning field' should be 'Playing field' Housing definitions need to reflect Government's White Paper: Fixing our Broken Housing Market (Feb 2017) – 'Home ownership units'	
	Appendix 1 on page 100 the entry for 'Biodiversity Action Plan' is unnecessary and in any case is the definition of biodiversity (which is the glossary item immediately above).	
Page 107	Acronym BAP on page 107 – not mentioned in the text and there is no BAP relevant to the City Plan and so entry can be removed	
Page 107	Acronym HRA on page 107 – small typo should be 'Habitats'	
Page 56	There is a typo at the bottom of page 56 which refers to the historic environment background topic paper rather than the natural environment one. This can be deleted as the correct sentence is to be found at the bottom of page 57.	
Policy F6	typo in there is an unnecessary extra 'then' after the word 'unavoidable' in the text.	



<b>Meeting:</b>	<b>Planning Policy Sub-Committee Council</b>	<b>Date:</b> 4 <sup>th</sup> September 28 <sup>th</sup> September 2017
<b>Subject:</b>	<b>Shopfronts, Shutters and Signage – Design Guidelines for Gloucester</b>	
<b>Report Of:</b>	<b>Anthony Wilson, Head of Planning</b>	
<b>Wards Affected:</b>	<b>All</b>	
<b>Key Decision:</b>	<b>Yes</b>	<b>Budget/Policy Framework: No</b>
<b>Contact Officer:</b>	<b>Charlotte Bowles-Lewis - Principal Conservation Officer:</b> <a href="mailto:charlotte.bowles-lewis@gloucester.gov.uk">charlotte.bowles-lewis@gloucester.gov.uk</a> (Tel: 396855)	
<b>Appendices:</b>	<ol style="list-style-type: none"> <li>1. Shopfronts, Shutters and Signage – Design Guidelines for Gloucester</li> <li>2. Summary of responses from consultation</li> <li>3. Public Consultation document</li> </ol>	

**FOR GENERAL RELEASE**

**1.0 Purpose of Report**

- 1.1 The Shopfronts, Shutters and Signage – Design Guidelines for Gloucester will be used to support the regeneration of the City through the planning process and will form part of the evidence base for the City Plan in due course. The guidelines will be also be used in the Development Management process to ensure schemes are of a high quality and preserve and enhance the character and appearance of the historic environment.
- 1.2 The report is to inform Members on the outcome of the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester consultation undertaken for a 6 week period from the 21st November 2016 to 16th January 2017.
- 1.3 To seek Members agreement to the adoption of the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester as a Supplementary Planning Document (SPD) to be used in the planning process.

**2.0 Recommendations**

**2.1 Planning Policy Sub-Committee is asked to RECOMMEND TO COUNCIL:-**

- (1) That the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester, be adopted as Supplementary Planning Document to be used in the planning process.

**2.2 Council is asked to APPROVE:-**

- (1) That the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester, be adopted as Supplementary Planning Document to be used in the planning process.

**3.0 Background and Key Issues**

**Shopfront Guide**

- 3.1 The current “Shopfronts - Design Guidelines for Gloucester” was produced in the early 1990’s and is now outdated. A number of mini shopfront guides have been produced in relation to the Historic Areas Grant Scheme (Eastgate Street, Barton Street and Southgate Street). These guides were predominantly pictorial and have been received positively by tenants, home owners and developers when seeking to make alterations and therefore an updated design guide for the City as a whole has been required for some time.
- 3.2 The revised “Shopfronts, Shutters and Signage – Design Guidelines for Gloucester” will follow the same principles by providing design guidance on the alteration or installation of shop fronts, shop signage and security in order to maintain or raise the design quality of these features in the townscape. It applies to all buildings City wide in Use Classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food take-aways).
- 3.3 The guidance is used by Officers in assessing planning applications for shop fronts, shop signage and security measures across the City and the Council will continue to promote its use as a guide for shop owners, tenants, architects and planning agents. The guide is also used when advising on schemes as part of the Councils grant initiatives – Southgate Street Townscape Heritage Initiative and also the current City Centre scheme. This guidance is also included within the Management recommendations of the Conservation Area Appraisals and will form part of the evidence base for the City Plan and as a basis for a development management policy within the City Plan.
- 3.4 A formal internal consultation process was carried out between 5<sup>th</sup> July 2016 and 5<sup>th</sup> August 2016. Comments were received from 12 internal consultees, from departments including Planning Policy, Development Management, Neighbourhood Management, Conservation, Landscape and Graphic Design Officers. The comments made by consultees were incorporated into the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester Draft document.
- 3.6 A formal external consultation was carried out between 21<sup>st</sup> November and 16<sup>th</sup> January 2017 for a 6 week period in accordance with the Town and County Planning (Local Development) (England) Regulations 2012. As part of the

consultation a formal response form was drafted with three key questions and an option to provide detailed comments, the questions were:

- Do you agree that the City Council should be preserving historic shopfronts in the City?
- Are the images helpful in document to identify exemplar schemes?
- Do you agree with the content of the guidance document? Are there any changes you would recommend?

3.7 The comments received totalled 16 written responses and these are set out within Appendix 2. The comments received all supported the three consultation questions, there were some minor comments in regards to minor text changes to elaborate on suitable materials and additional paint colours. Additional information was requested to be included within the guidance in the form of Advertisement Regulations, enforcement and where to find relevant information to make an application. A full report of the comments received as part of the consultation and the Council's response can be seen in Appendix 2. A number of positive comments were received and in particular from Historic England who were very complementary and the document has already been promoted as an exemplar and forwarded to Canterbury Local Authority.

3.8 The guidance has been updated and amended where necessary taking account of the minor changes proposed in response to the comments received. The final version of the guidance is attached in Appendix 1.

3.9 This guidance will ensure that forthcoming schemes are well considered and preserve and enhance the City's unique and distinctive historic character. The City has a number of traditional and historic shopfronts, especially in the Gate Street and the aim is to ensure that these are preserved and where lost reinstated to a better quality environment.

#### **4.0 Asset Based Community Development (ABCD) Considerations**

4.1 The aim of guidelines is for the members of the public, consultants and developers to use the guide to assist with informing the design shopfronts and signage within the City as part of any development management scheme. This guidance will ensure that schemes are well considered and meet the City Council's requirements leading to a better quality environment which is welcoming and enticing.

#### **5.0 Alternative Options Considered**

5.1 The positive approach to regeneration is recommended with the National Planning Policy Framework and would also form part of the evidence base for the forthcoming City Plan. The work will also feed into the City Plan development control policies where there is a specific policy for the retention of historic shop frontages and for signage to accord with the Councils Shopfront Guidance document.

#### **6.0 Reasons for Recommendations**

6.1 The updated guidance will be used to support the regeneration of the city centre and will form part of the evidence base for the City Plan in due course. The

guidance has been well received by owners and residents in the City and key stakeholders such as Historic England have praised the high quality and detailed guidance which has been produced and endorsed the adoption as a Supplementary Planning Document. The guidance will be used in the Development Management process to ensure schemes are of a high quality and preserve and enhance the character and appearance of the historic environment of Gloucester.

## **7.0 Future Work and Conclusions**

- 7.1 If members adopt the guidance as a Supplementary Planning Document there will be the requirement to make a suitable announcement of this. Legislation and government guidance dictates the format that such notification and publicity takes place.
- 7.2 If adopted the guidance will immediately become a material consideration for assessment of planning and advertisement applications for shopfronts and signage applications within the City.

## **8.0 Financial Implications**

- 8.1 None

(Financial Services have been consulted in the preparation this report.)

## **9.0 Legal Implications**

- 9.1 Following a period of public consultation undertaken for a 6 week period from the 21st November 2016 to 16th January 2017 the Shopfronts, Shutters and Signage – Design Guidelines for Gloucester will gain a level of weight within the planning process, and become a material consideration in planning terms. The guidelines will be used to guide the design and implementation of shopfronts within the city, to enable the Council to promote high standards of design leading to a better quality environment due to its historic importance.

(One Legal have been consulted in the preparation this report.)

## **10.0 Risk & Opportunity Management Implications**

- 10.1 A low risk has been identified as a result of this report. This low risk involves the possibility of the guidelines not being adopted as an Interim SPD and therefore the quality of shopfronts, advertisements and alterations within the City will result in the loss of historic fabric and the street scene and character of Gloucester being adversely affected.
- 10.2 The main opportunity is to achieve higher standards of shopfronts, advertisements and retention of historic features if the document is adopted as planning and design guidance.

## **11.0 People Impact Assessment (PIA):**

- 11.1 The aim of the document is for the members of the public, tenant, consultants and developers to use the guide to assist with informing the design shopfronts and

signage within the city as part of any development management scheme. This guidance will ensure that schemes are well considered and meet the City Councils requirements leading to a better quality environment due to its historic nature and would preserve and enhance the City.

- 11.2 The PIA Screening Stage was completed and did not identify any potential or actual negative impact, therefore a full PIA was not required.

## **12.0 Other Corporate Implications**

### Community Safety

- 12.1 The process of carrying out the public consultation on the Shopfront Guide has no community safety implications.

### Sustainability

- 12.2 The Shopfront Guide supports the process of achieving sustainable development and will contribute to the improvement of the city centre for both residents and visitors to Gloucester. The document when adopted would ensure proposals have a positive impact on the environment of Gloucester.

### Staffing & Trade Union

- 12.3 No impacts.

**Background Documents:** None

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Respondent	Respondent	User's Response: Free-Text (formatted)	Officer response
Lesley Brain		<p>1. I strongly agree the Council should preserve historic shopfronts.</p> <p>2 The images are very helpful indeed</p> <p>3. I agree with the content but would like to add a few comments.</p> <p>Colour - I think that the colours shown as examples are very good (a nice red plus grey green and blue). However, this does not give a view of the full range of recommended RAL conservation colours and I have been unable to download a colour chart. My fear is that this will provide too wide a range - my particular concern is the red and yellow colours which can be very garish and, dare I say, lower the tone of the neighbourhood! - although I must say I approve of the red selected as an example. I feel it would be much better to select a more limited range of colours for shopkeepers to choose from (say 14 1 red, 3 greens, 3 blues, 2 greys, 2 browns, black, cream, white). These colours would not detract the eye from the buildings as a whole and would help to blend the old and new buildings into a cohesive street view. A limited range would also ensure that there are no arguments about colour! Many years ago Bath introduced a very limited palette with great success.</p> <p>Enforcement is mentioned a couple of times but sounds a little weak to me. If a traditional shopfront is removed and replaced with modern, will the council compel the shopkeeper to replace with traditional, even if he pleads he has no money left? It seems to me that many changes have been made to shopfronts over the years and not been caught up with until after the event.</p> <p>I hope the council will enforce but, even better, would be to get the shopkeepers on-side from the outset. How? A mass meeting with shopkeepers with a presentation explaining the scheme and making them aware of grants available (important because shopkeepers are often reluctant to spend money and many are unaware of the historic importance of their property). The importance of the kerb appeal of their shop should also be emphasised. I advocate a meeting because busy people do not always read leaflets or go online. Perhaps this could be</p>	<p>1. Comments noted.</p> <p>2. Comments noted.</p> <p>3. Colours to be added to.</p> <p>Regarding enforcement comment noted, the Council does pursue enforcement action and requires owners/tenants to remove any unauthorised works if these would have required planning permission for changes.</p> <p>The Council offers funding for works to shopfronts within certain areas and training and workshops are provided in caring and maintaining historic properties as part of these schemes. The document has been promoted through the traders forums and city centre business groups.</p>
Arthur Bramwell		<p>1. Yes</p> <p>2. Yes</p> <p>3. Yes</p>	<p>Comments noted, no changes required.</p>

R Howard		<p>I agree with preserving historic shopfronts. The images are very helpful - especially the good and bad example of the same shop.</p> <p>I agree with the guidance, however the emphasis on high quality material for signs probably means more expense. This is a shame if a new business is starting and doesn't know if it will succeed. Also hard for temporary shops. Surely cheaper materials can be made to look traditional.</p> <p>Why just wooden signs - surely some traditional signs were metal? Will there be grants to help people with the additional expense?</p>	<p>Comments noted.</p> <p>Regarding materials there are a number of options which can be used by tenants and these are set out with the report.</p> <p>The Council offers funding for works to shopfronts within certain areas and training and workshops are provided in caring and maintaining historic properties as part of these schemes. The document has been promoted through the traders forums and city centre business groups.</p>
David Champion		<p>This is an important document and makes good reference to the policies which are all too frequently flouted by property owners and their tenants.</p> <p>The images are an important part of this document and is an astonishing affront to use the 6 images on page 7 re para 3.2, using properties in Cheltenham to demonstrate references being made to particular examples in parts of Gloucester!</p>	<p>Comments noted.</p> <p>Amended to include pictures of Gloucester on page 7</p>
Maggie Caamano		<p>I do agree that the city council should be preserving historic shopfronts but also raising the standard and quality of some of the existing signage throughout the city. The overwhelming impression of the city at the moment is that it needs investment. It does not feel like an attractive place to shop and this is partly the reason many choose not to shop in the centre but spend more time at the Quays or even Cheltenham Many of the signs throughout the city centre now do not reflect the historic nature of the buildings in the area. There are far too many bargain shops and whilst there is always a place for this type of store, they could present themselves more in keeping with a small historic city.</p> <p>The images in the documents are very helpful.</p>	<p>Comments noted.</p>

<p>Jonathan Hoad</p>		<p>I would urge the City Council, within the constraints of existing legislation and resources, to enforce the policy as rigorously and firmly as possible. Over the decades some awful planning decisions have been made in the City, appearance is very important if we are to have any hope of succeeding as a destination City.</p> <p>Historic frontages should be preserved and restored to counter corporate blandness and uniformity and individual vulgarity. There is also scope in newly developed areas for a more contemporary look, this is modern, vibrant city not Trumpton. Quality of design and material is still important in these settings.</p> <p>The images were helpful particularly the before and after sets.</p> <p>The emphasis on the City/Commercial centre is understandable but a clearer statement should be made that the principles and policies apply across the City to all retail outlets. Perhaps some of the photographic examples could be drawn from satellite retail areas like Hucclecote, Longlevens and Tuffley?</p> <p>There seems to be no role for Councillors. It is important that they understand the policy and act as ambassadors in their Wards and are the Council's eyes and ears.</p> <p>Having the endorsement of bodies like the Civic Trust, the Chambers of Commerce and the Small Business Federation and the Gloucester Citizen, if not in the document then at the launch would add value and provide buy in. Also, public commitments from the big developers should be norm.</p> <p>Are there parts of the business community, perhaps in the small retail/sole trader sector where perhaps the strategy and compliance is less well understood and seen as an intrusion and financial burden? This perhaps where Councillors have a role to play.</p>	
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Wychavon District Council (Sarah Matthews)	Wychavon District Council	<p>Agree that the SPD should preserve the historic shopfronts and found there is a good balance between text, drawings and photographs. Throughout the document, the acceptable and unacceptable photo examples are a very useful way to show applicants what the Council's aspirations are for future applications for shop frontages and signs. The bullet point boxes illustrating what is permitted and not permitted also make it very clear to the reader what shop front elements / advertisements are acceptable.</p> <p>Overall, the SPD is thorough and informative with good use of positive photos and illustrations to encourage applicants to submit applications that reflect acceptable design principles in their shop front proposals..</p>	Comments noted.
Historic England (David Stuart)	Historic England	<p>We note that existing guidance on this theme would benefit from an update and congratulate your authority on this comprehensive initiative. This can form a legitimate part of a positive heritage strategy for the city and become part of a suite of policies and other initiatives collectively designed to enhance its historic built environment.</p> <p>We are pleased that the guidance goes beyond generic advice to draw upon an understanding of the features and their value which are distinctive to the city's historic character and use these to promote locally relevant recommendations and proposals. It is always helpful to highlight appropriate interventions by reference to successful examples already in existence in the area. This is particularly helpful on such issues as window signs and stickers which are notoriously difficult to regulate and advise upon.</p> <p>This approach applies not only to long-established traditional features but those which may have been introduced more recently. Highlighting the incompatibility of pseudo Victorian shopfront designs in post war buildings is a useful illustration. Finding good examples of contemporary shopfront design in modern buildings to help champion this message is however a more challenging exercise.</p> <p>Key to its success will be securing widespread familiarity and buy-in amongst those most likely to have responsibility for the matters covered and especially those whose best interests it is intended to promote. We would therefore support the introduction of this Guidance.</p>	Comments noted.

Gloucestershire County Council (Rob Niblett)	Gloucestershire County Council	I can confirm that I have no comments to make on it.	Comments noted.
Kings Walk Shopping Centre (Peter White)	Kings Walk Shopping Centre	Yes I would certainly agree that the CC should be preserving historic shopfronts and believe that the draft guidelines go some way in assisting shop owners and landlords in how to manage their shop frontage and signage. It's especially important in the gate streets and with listed buildings but should be used as a negotiating tool for new tenants in these areas. Shopping Centre's would still need to consider solid external shutters due to the nature of the business and security of stock. Apart from this point, I agree to the content although each unit does have an individual case and there would need to be a degree of flexibility in any discussions over design and spec of shopfront and signage.	Comments noted.
Highways Agency (Chrystle Garner)	Highways Agency	Having reviewed the consultation documents we consider that the proposed Draft Design Guidance is unlikely to result in a detrimental impact on the safe and efficient operation of the Strategic Road Network. However, whilst the Draft Guidance largely relates to the historic centre of Gloucester, it is not specific to a particular road or route. Where future shopfront proposals, particularly those comprising signage, require express consent from the Local Planning Authority and may have an impact on the SRN, Highways England should be consulted at the earliest opportunity.	Comments noted.

Natural England (Consultation Service)	Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England does not consider that this 'Draft Shopfronts, Shutters and Signage Design Guidelines for Gloucester poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	Comments noted.
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Andy.birchley		<p>Links on P3 and P21 (two of them) do not connect to the pages they should be.</p> <p>Also, on P23, where you refer to application forms being available from the Council (in paper format), you could link to the following, where applications can be made electronically (planners would encourage this): "http://www.gloucester.gov.uk/resident/planning-and-building-control/make-a-planning-application" http://www.gloucester.gov.uk/resident/planning-and-building-control/make-a-planning-application</p> <p>P5 just as a style thing I think it would look better to have the policy bullet points in grey box, as they were on the previous page &amp;ndash; makes it stand out</p> <p>P8 - Very useful to have the components identified, especially for a layperson like me!</p> <p>P13 Advertisement regs required for other reasons than just illumination, I think it would be better to supplement that sentence with or otherwise depending on size, or location on the building. I know this is quite general but the advert regs are too complex to include in detail here!</p> <p>On pages 14, 17, 18, 19, and 23 you use photos of unacceptable shopfronts (or features) which have not been subject of enforcement action. Does it send the wrong message if people read this and note that no action has been taken?</p> <p>P22 I would add the word advertisements between Alterations and second line of the Enforcement paragraph</p>	<p>Comments noted. Alterations completed as advised.</p>
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John Richings		<p>When I was a police officer many years ago there was an offence of 'Obstructing the highway' which included the pavement. It seems to me that shops are clearly encroaching on pavements with tables and chairs for refreshments and shop signs. Is this sanctioned by the Highways Authority ? Or is it a matter of a lack of enforcement?</p> <p>With some of the shops expanding more and more pedestrians will soon have to proceed through mazes to progress. This obviously doesn't matter to those who are fit and nimble but for anyone elderly with balance problems and walking aids it would be a nightmare. If pedestrians do injure themselves with today's litigious society who pays any compensation claims the shop owners or the Highway Authority?</p>	<p>Comments noted. Table and chairs and A-boards on the pavement are controlled by the City Councils Licensing team, there are guidance documents available online and each shop where they have such additional items have to conform to the license issued.</p>
Target Catering Equipment (David Pedrette)	Target Catering Equipment	<p>Many thanks for this very comprehensive guide. It will hopefully lift standards, improve the street scene and look of our City while encouraging independent businesses to locate to the City.</p> <p>Well done to all concerned.</p> <p>Are there any grants available to help with this regeneration?</p>	<p>Comments noted. The Council offers funding for works to shopfronts within certain areas of the City - Southgate Street and City Centre presently.</p>



British Sign and Graphics Association (Chris Thomas)	British Sign and Graphics Association	<p>The BSGA represents 65% of the sales of signage within the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within The National Planning Policy Framework, Planning Practice Guidance and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007.</p> <p>We would first wish to know what is proposed as the status for this document. Is it proposed to be adopted as an SPD or simply as guidance which will not carry the same weight in planning proceedings?</p> <p>As to detailed comments, we consider that this draft is for the most part sound and sensible for its first 9 pages. In particular, we would agree with paragraph 3.3 which stresses that flexibility is essential. A brief survey of central Gloucester shows that, even in the historic core (the South, North, West and Eastgate Streets), there are very many (probably the majority of) shopfronts which are totally modern in design and appearance. The draft guide seems to have little of relevance to this large number of properties and the many other similar ones outside of the historic core. Rather, from section 4.2 onwards, the guide pretends to advise on matters of which most are of aesthetic choice. Much of the advice is unnecessarily prescriptive. More is unenforceable.</p> <p>The guide makes no mention of the Control of Advertisements Regulations or the national practice advice in PPG - Advertisements. Apart from a brief reference to the DCLG advice booklet, it fails to explain that many of the most common forms of shop signs may be either excluded from control (eg inside buildings) or may be displayed with deemed consent (Schedule 3 to the Regulations). As a simple example, a sign displayed with deemed consent under Schedule 3, Class 5, may not be controlled by colour, content or materials. Without reference in greater detail to these general permissions granted by the law, the guide is misleading.</p>	<p>The document will be adopted as an SPD. Amended to include further advice in light of PPG and Control of advertisement regulations.</p>
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## Shopfronts, Shutters and Signage – Design Guidelines for Gloucester: Consultation Response Form

**Please read the following before completing the form:**

- You are recommended to use this form as it provides all the information to deal with your comments efficiently. All comments must be in writing.
- Please complete sections 1 – 3 and print clearly in dark ink or type.
- Forms can also be downloaded from the “current consultations” page on the City Council’s website at [www.gloucester.gov.uk](http://www.gloucester.gov.uk)
- More forms are available from the City Council’s Offices.
- Comments will be made public and cannot be treated confidentially.

1. Applicant Name and Address	2. Agent Name and Address (if applicable)
Title:      First Name:	Title:      First Name:
Last Name:	Last Name:
House No:	House No:
Address:	Address:
Postcode:	Postcode:
Email:	Email:
Phone:	Phone:
Fax:	Fax:

**3. Consultees are asked to comment on the following questions:**

- Do you agree that the City Council should be preserving historic shopfronts in the City?
- Are the images helpful in document to identify exemplar schemes?
- Do you agree with the content of the guidance document? Are there any changes you would recommend? Please identify the section you are referring to.

Please set out your comments below *(please use extra paper if required)*.

<b>4. Signature:</b>	<b>Date:</b>
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Comments should be submitted no later than **16<sup>th</sup> January 2017**

These should be sent to **Planning Policy and Heritage Team, Gloucester City Council,  
Herbert Warehouse, The Docks, Gloucester, GL1 2EQ**  
or email [heritage@gloucester.gov.uk](mailto:heritage@gloucester.gov.uk)

# Shopfronts, Shutters & Signage

## Design Guidelines for Gloucester



June 2017

Gloucester  
**City Council**  
Transforming Your City

# Shopfronts

## Design Guidelines for Gloucester

### A Guide for Owners, Designers and Shopfitters

#### Forward

The City has a number of traditional and historic shopfronts, especially in the Gate Streets and the aim is to ensure that these are preserved and where lost reinstated to a better quality environment. This revised guidance is welcomed and will ensure that forthcoming schemes are well considered to ensure that the City's unique and distinctive historic character is preserved and enhanced for all to enjoy.

The Council appreciates that many retailers in Gloucester are facing increased competition due to a rise in online shopping and the effects of the economic downturn. This issue has been recognised by the Council offering support to businesses and owners through the many grant initiatives in the City. It is also important to attract shoppers and encourage them to return and this can be achieved by maintaining attractive shopfronts and streetscapes to entice shoppers and visitors to Gloucester. Shopfronts play an important role to improve the appearance of the street and add to the historic character of the City.



Councillor Colin Organ  
(Cabinet Member for Housing & Planning)

**'Shopfronts: Design Guidelines for Gloucester'** The Shopfronts, Shutters and Signage – Design Guidelines for Gloucester will be used to support the regeneration of the City. The aim of guidelines is for the members of the public, consultants and developers to use the guide to assist with informing the design shopfronts and signage within the City as part of any development management scheme. This guidance will ensure that schemes are well considered and meet the City Council's requirements leading to a better quality environment. This revised document will follow the same principles of the previous design guide produced in the 1990's by providing design guidance on the alteration or installation of replacement shop fronts, new signage and security measures in order to maintain or raise the design quality of these features in the townscape.

If you have any questions regarding the guide please contact:

**Planning Policy & Heritage Service**, Gloucester City Council,  
Herbert Warehouse, The Docks, Gloucester, GL1 2EQ

[www.gloucester.gov.uk](http://www.gloucester.gov.uk)

Email: [Heritage@gloucester.gov.uk](mailto:Heritage@gloucester.gov.uk)

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This guide is intended to provide practical advice for developers and retailers who are considering changes to the external appearance of a shop. It outlines the components of a historic shopfront, the elements of good shopfront design and information on any necessary planning consent.

The guidance applies generally to shopfronts throughout the city, but more specifically to those buildings in conservation areas and those which are designated heritage assets, eg specifically listed buildings.



## 1. INTRODUCTION

Gloucester has a rich history evidenced by the variety of historic buildings that continue to stand in the city today. The commercial centre in particular contributes a vital element to the story of Gloucester's development. It is essential to preserve the character and integrity of these historic buildings, while ensuring that they are able to meet the needs of current and future generations.



Gloucester's heritage, along with its diverse communities, marks what is unique about the city. How that heritage is managed, presented and connected with, has a crucial impact on the perception of the city locally, nationally and internationally. It is central to Gloucester's civic pride, status, sense of place and continuity in times of change.



It is now a well established fact that an attractive and historically sensitive commercial shopping area can help boost a city's economy. The Council appreciates that many retailers in Gloucester are facing increased competition due to a rise in on-line shopping and the effects of the economic downturn. It is therefore more important than ever to attract shoppers and encourage them to return.

Shopfronts have an important role to play. They can promote the image of your business and should be designed to entice shoppers and visitors inside. Shopfronts can also help to improve the appearance of the street attracting shoppers to the area.



It is essential to have a high standard of shopfront design, construction and maintenance in order to provide an attractive and pleasant environment for workers, residents and visitors. This will not only protect the history and heritage of the city, but will make Gloucester more attractive and prosperous.



## 1.1 The history of commercial shopfronts in Gloucester

Gloucester has been a busy commercial centre for centuries because of its road and river trade. The City centre is laid out in a cruciform plan with four principal streets meeting at a cross. This was a typical Roman plan.

Until 1714, many structures on the main streets were gabled timber buildings. Later, a considerable number were either rebuilt or re-fronted with brick. Also, in the eighteenth century many imposing civic buildings were built and other buildings that were seen as obstructions were demolished.

The creation of the Gloucester and Berkeley Canal, and a series of basins at the Gloucester Docks in the early to mid-eighteenth century, led to an increase in Gloucester's trade and prosperity. These water features, along with the new railway lines, had a direct effect in stimulating commercial activity in the City.



By the 1850s, most of buildings in the centre no longer had timber fronts. They had been replaced by brick and stucco fronts and many had large shop windows.



From the end of the nineteenth century through to the First World War, the centre had been transformed because of the numerous new additions - public buildings, banks and shops.

In the 1920s and 1930s, many new shops were built in the city centre and areas of slum dwellings were demolished. One large commercial development was King's Square created in 1929 in the City centre.



Throughout the twentieth century, much redevelopment occurred in the city centre and some historic buildings were demolished. In the 1960s and 1970s the primary shopping centres of King's Walk and Eastgate were created. The latter required the relocation of the historic Eastgate Portico to create the new entrance to the shopping centre. Several of the historic shopfronts were replaced with more modern and less historically sensitive façades.

In the twenty first century, the focus has been on regeneration in Gloucester and new commercial areas such as the Gloucester Quays have been created. There is an emphasis on preserving existing historic shopfronts and on restoring newer shopfronts so that they are historically sympathetic.

## 2. POLICIES - National Guidance

### 2.1 The National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published on 27 March 2012. One of the key elements of sustainability is protecting and enhancing our historic environment and heritage assets should be conserved in a manner appropriate to their significance. This is to ensure that they can be enjoyed for their contribution to the quality of life by current and future generations. The NPPF continues the theme of PPS5 Planning for the Historic Environment paragraphs 126 to 141, which are the core historic environment paragraphs contained within chapter 12 of the NPPF.

### 2.2 Planning (Listed Buildings and Conservation Areas) Act 1990

The Act places a statutory duty on local planning authorities in the exercise of their planning function to *'pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'* (Sections 16 and 66). Also, *'to preserve or enhance the character or appearance of conservation areas'* (Section 72).

The Department of Communities and Local Government has produced *'Outdoor Advertisements and Signs: A Guide for Advertisers'* (June 2007) which provides further assistance on signs and advertisements. This booklet is only a guide. It does not include every condition or limitation for every class of those advertisements which are normally permitted. For full details see *"The Town and Country Planning (Control of Advertisements) (England) Regulations 2007"* and *"Circular 03/07: Town and Country Planning (Control of Advertisements) (England) Regulations 2007"*. It is possible that shop signage will be considered *"deemed Consent"* and therefore will not require a planning application as this falls within the parameters of current advertisement control, but please check with the Council before proceeding with any changes.

### 2.3 City Council Policies

The City Council has a Development Plan containing policies that assist in shaping development and ensuring good standards - The City of Gloucester Second Stage Deposit Local Plan (2002). The Plan has a policy relating to shopfronts, shutters and signs which states:

#### **Policy BE.11 Shopfronts, Shutters and Signage**

Proposals to alter an existing shopfront or sign, or create a new shopfront or sign, should take account of the following guidelines:

1. There will be a presumption in favour of retaining good quality traditional shopfronts that make a positive contribution to the character of the area and are capable of repair.
2. A new or refurbished shopfront should be designed to take account of the design, style and proportions of the building of which it forms a part and the character of the street in which the proposal is located.

3. Advertisements, signs and notice boards must be appropriate in scale, design and materials to the character and appearance of the building of which it forms a part and the street scene in which the proposal is located.
4. Proposals for external security measures on shopfronts will only be approved where the proposal harmonises with the shop front and the street scene.
5. The new shopfront should be accessible to wheelchair users wherever this is practical.
6. Hanging or projecting signs must not interfere with the visibility requirements of existing CCTV cameras.

The City Council are reviewing the 2002 Local Plan and Gloucester's emerging Development Plan Documents are:

- **Joint Core Strategy**
- **Gloucester City Plan**

The pre-submission Draft Joint Core Strategy 2014, has been produced in partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council and sets out a planning framework for all three areas. Policy SD9 in the Joint Core Strategy concerns the historic environment:

#### Policy SD9 - Historic Environment

1. The built, natural and cultural heritage of Gloucester City, Cheltenham town, Tewkesbury town, smaller historic settlements and the wider countryside will continue to be valued and promoted for their important contribution to local identity, quality of life and the economy.
2. Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment.
3. Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place. Consideration will also be given to the contribution made by heritage assets to supporting sustainable communities and the local economy. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate.
4. Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged.
5. Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been assessed.

This policy contributes towards achieving Objectives 1, 2, 4 and 5.

The Gloucester City Plan will sit beneath the Joint Core Strategy and provide more detailed site allocations and development management policies. It will, for example, set out where and when major regeneration schemes are expected to emerge, as well as identifying sites for new homes, jobs and shopping.

It will provide a framework for managing and enhancing the city's wider historic and natural environment, including conservation areas, listed buildings, sites of archaeological interest and public open spaces. This document will also contain historic environment policies including one relating to 'Shopfronts, Shutters and Signage', and this guidance will form part of the evidence to inform this policy.

## 2.4 Conservation Area Polices

Gloucester City has fourteen adopted Conservation Areas, which cover most of the City centre, as well as parts of Hempsted and Hucclecote Green. The most recent, Denmark Road Conservation Area (No 14), was designated and adopted by Full Council on 27 November 2008. The associated management recommendations give guidance on how the preservation or enhancement of the conservation area can be achieved. The following policies are of importance:

- The Council will seek to ensure the retention of existing historic shopfronts and notable elements of historic shopfront design.
- The Council will expect all applications for new or altered shopfronts to accord with the advice given in the publication 'Shopfronts - Design Guidance for Gloucester', and in Policy BE.11 'Shopfronts, Shutters and Signs' in the 'Gloucester Local Plan, Second Stage Deposit August 2002.'
- The Council will seek to ensure that all advertisement proposals relating to shops respect the character and appearance of the conservation area, in terms of siting, number, colours, materials and form of illumination.



### 3. ELEMENTS OF GOOD SHOPFRONT DESIGN

#### Part 1 - Specific building types

#### 3.1 Shops that occupy more than one building

It is important for the appearance of buildings and the street scene that shopfronts correspond to only one building, even if the shop occupies more than one building.



Many properties in Gloucester are tall and narrow fronted. As a result, shops sometimes occupy more than one building, for example, in Worcester Street and on Bristol Road.

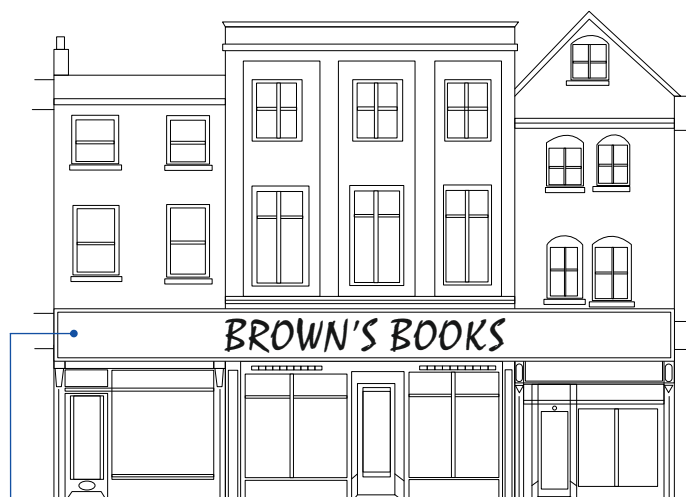
In order to distinguish the separate buildings, the shopfronts should be divided to correspond with each building. This can be done with pilasters, columns or, where appropriate, a change in fascia level so that the individual buildings are still apparent.

Failure to subdivide the shopfronts visually can have a detrimental effect, not only on the appearance of the buildings and the street scene, but on the interest and variety provided by individual buildings as well. Where a shop occupies more than one unit, it is better to repeat fascia signs and canopies rather than extend them across.

This is because overlarge fascias and canopies affect the balance across the building and often result in the loss of original features such as corbels and capitals. The street scene also takes on a horizontal appearance rather than the correct vertical appearance.



Preferred arrangement



A number of traditional features have been lost beneath the fascia board

### 3.2 Buildings designed to have a uniform appearance

Some terraces in Gloucester were designed and constructed at the same time to give the building a uniform appearance. Examples of this are St. Aldate Street, The Oxeboode and College Street. Shopfronts in these buildings should be designed to retain this uniformity as originally designed.

Within these terraces, fascia levels, corbels and pilasters should be similar in all units. However, there is an opportunity for each shopfront to take a somewhat individual design approach, provided the design stays within similar proportions. In some cases, such as College Street, the precise uniformity should remain unchanged.



### 3.3 Contemporary buildings

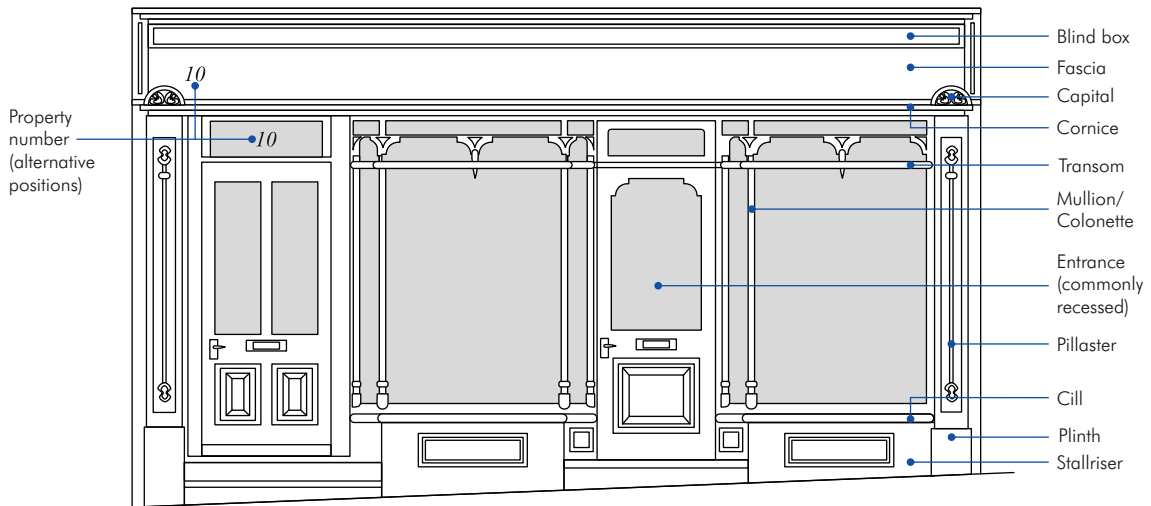
Reproduction of traditional shopfront designs are usually inappropriate for modern properties as they generally ignore the character of the building within which they sit. Modern buildings can, however, present a good opportunity to add examples of the architecture and styles of our own period into the townscape.

A modern shopfront must still have quality design, materials and workmanship. This is particularly important when the property is situated within a conservation area or adjacent to a listed building. The proportions of the design and the correct use of materials are as important as with the design of a traditional shopfront. However, with modern buildings there is more scope for innovation and creativity, which could be a valuable contribution to the variety and interest of the City.

## 4. ELEMENTS OF GOOD SHOPFRONT DESIGN

### Part 2 - Components

A traditional shop front is based on a number of key architectural features that link together to form a framework. These features will be discussed in the following section and are identified in this key diagram for quick and easy reference.



Traditional Shop Front

### Definitions

**Blind Box** - Originally used to conceal a roller blind, now used to hide trough lights within a fascia.

**Console/Bracket** - Sometimes the pilasters are topped by a console or bracket. These frame the fascia and the blind box.

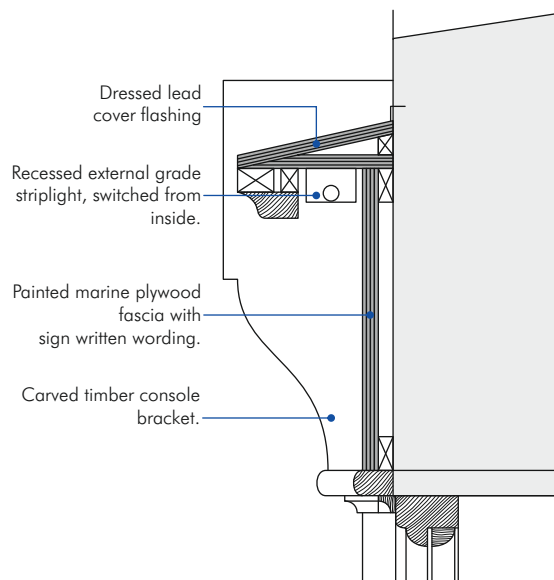
**Fascia** - The fascia is the primary place that a shop displays its sign.

**Pilasters** - Frame the shopfront vertically and are on either side of the windows, providing visual support to the fascia.

**Mullion** - Vertical pieces of timber that divide the window into smaller panes of glass.

**Cill** - This tops the stall raiser and both protects it and throws rain from it.

**Stallriser** - The panel below the window that not only raises the window from the ground but also provides a visual base for the rest of the shopfront.



Blind Box (section)

*(continued overleaf)*



**Transoms** - The horizontal divisions used to divide large expanses of glass.

**Cornice** - Provides a horizontal divide between the shop front and the upper floors.

**Pilaster** - Pilasters provide vertical framing to the shop front and provide visual support to the fascia and upper floors. They are a traditional building feature designed with a base and capital and can also establish a visual division between neighbouring properties.

**Threshold** - The recessed entrance lobby leading to the door that allows for more window display area. Often these areas have floor tiling, sometimes in a mosaic pattern.

If you intend to upgrade your shopfront it is worth considering the opportunities that you already have in place. Re-using existing features can be a cost effective and sustainable way of improving your shop and is less likely to require planning permission.

Whilst there are some modern shopfronts in Gloucester, the city retains many historic shopfronts with their traditional elements such as pilasters, capitals, corbels and cornices. These original features can bring identity and character to your shop and should not be removed, damaged or obscured. Where necessary, they should be repaired and retained as part of any proposed alteration.

Where you have a wholly original shopfront, serious consideration should be given to refurbishment rather than replacement. The original shopfront is likely to have been manufactured from quality materials (such as timber), and the proportions of the design are likely to balance across the shop and the building as a whole. Original features bring identity and character which many replacements lack. It is for this reason that the Council will seek their retention and recommend repair rather than replacement when planning applications come forward.

#### 4.1 Materials

Shopfronts of historic and traditional buildings should only be constructed of traditional and natural materials. Such materials could include timber, stone, marble, slate, brass or cast iron. The materials will vary depending on the age, style and location of the property, but they must be appropriate to the building and show careful consideration to historical accuracy and local tradition and be responsibly and sustainably sourced.





Historic shopfronts were usually constructed from hardwood and were painted. Some materials that are used in replacement shopfronts are not appropriate to historic shopfronts. These include modern materials such as plastic, aluminium and acrylic sheeting.

Even modern shopfronts should be constructed of high quality materials. Some appropriate materials may be timber, stone, brass, marble, stainless steel or chrome. Staining of shopfronts should be avoided as it rarely achieves a quality finish.

Where timber is used for a shopfront replacement or repair, it should be obtained from a sustainable source. The choice of architectural ironmongery such as letterboxes, nameplates and kick plates is also important. Poor quality or inappropriate designs can easily spoil the appearance of the shopfront.

#### 4.2 Colour

The colour of a historic shopfront should be historically sympathetic if not historically accurate, paint should preferably be of a matt finish and carefully chosen not to clash with adjacent properties. Here are just a few colours that are considered suitable:

					
RAL 3004 Purple Red	RAL 5001 Green Blue	RAL 5020 Ocean Blue	RAL 6021 Pale Green	RAL 7037 Dusty Grey	RAL 5007 Brilliant Blue
					
RAL 9005 Jet Black	RAL 6034 Pastel Turquoise	RAL 3016 Coral Red	RAL 1020 Olive Yellow	RAL 1015 Light Ivory	RAL 1002 Sand Yellow

However, many other colours are also considered historically sympathetic and should harmonise with the street scene. The RAL range of conservation or heritage colours is particularly relevant for Victorian and Edwardian shopfronts and a number of paint companies provide a variety of colours based on a heritage range.

It is appropriate for shopfronts to be painted a single colour, sometimes with a second colour to highlight decorative elements. Overly bright or garish colours are not considered acceptable within conservation areas or on listed buildings.

### 4.3 Shopfront fascia signs

Fascia signs should appear as an integral part of the design of the shopfront and the building, and should not dominate the façade.

Fascia signs should not be overly large in comparison to the building as a whole. The fascia board should not be boxy or deep or conceal traditional features such as the first floor windows or the corbel brackets; instead, it should sit comfortably on the building between the corbel brackets. The depth of the fascia should not normally be greater than one quarter of the height from pavement level to the bottom of the fascia.

In general, fascia signs in conservation areas should be constructed from timber with hand painted lettering. These signs should not be made of glossy acrylic or plastic. Hand-painted fascia boards are usually appropriate for historic or traditional properties, especially on listed buildings.

Fascia boards should contain the name of the business and preferably the property street number. Repetition of information or excess wording is to be avoided, as this creates a confused and cluttered appearance. Fascia signage should avoid including large images as part of the advertisement.



Hand-painted fascia signs are particularly appropriate for traditional shopfronts. These must be created by an experienced sign writer so that the sign has a professional appearance and finish. The lettering must be of an appropriate style and size so that the sign appears as an integral part of the shopfront design.

Alternatively, individual letters could be mounted onto the fascia, fixed by spacers. The type of materials and the details of the lettering should be chosen according to the design of the shopfront and the historic nature of the building.

The materials of the lettering should always be of good quality and a matt finish. Glossy acrylic or plastic will not be acceptable on listed buildings or in conservation areas and should be avoided.



### Fascia signs - Summary

#### Not permitted

- Internally illuminated signs, swan-neck and other projecting lights.
- Boxy, deep fascia signs which dominate the shopfront or sit proud of the fascia board, pilasters or console brackets.
- Fascia signs made of shiny plastic.
- Oversized/acrylic/plastic lettering.
- Fascias coloured in overly bright or garish shades that would not normally be considered acceptable in the historic setting of a conservation area.

#### Permitted

- Signs constructed from timber with hand-painted lettering.
- Lettering to detail business name and street number.
- Signs of a size that sits comfortably on the building between console brackets.
- Signs with a satin or matt finish.
- Signs lit by individual halo illumination.
- Signs illuminated by trough light if concealed within fascia/blind box.

### 4.4 Projecting signs and hanging signs

Traditional hanging signs are an important feature to historic high streets, but they must be designed so that they relate positively to the age and style of their corresponding shopfront. Ideally, these signs should be symbolic trade signs that depict the business carried out on the premises.

Traditional signs should ideally be constructed from timber and hand painted. They should not be made of glossy acrylic or plastic. The sign should be high quality, and should be made to a high standard of workmanship and design. Signs should be displayed on traditional hanging brackets in a style to suit the building. The positioning of the bracket will



depend on the style of the building, but ideally the sign will be either adjacent to the fascia sign or be at the first floor level.

A sign's position must take into account the architecture of the building, the design of the shopfront and the

location of other signs in the vicinity. Only one hanging sign per business is permitted and in some cases, any form of hanging or projecting sign may be inappropriate.

Modern projecting box signs are unsightly and obtrusive and disrupt the streetscape in historic areas. Therefore, projecting box signs will not be permitted in conservation areas or on listed buildings and should be avoided.

Projecting signs should not be internally illuminated and ideally be no greater than 50mm in depth. The size of the sign itself will need to be carefully considered in order to ensure that it sits comfortably on the building without dominating the scale of the building or the streetscape. A maximum size should be 600mm x 400mm, but a smaller sign may be required.

Advertisement consent is required for any hanging or projecting signs if illuminated. Inappropriate signs are discouraged, and where no valid advertisement consent exists, it may be appropriate for the Council to take enforcement action.

### Projecting Signs - Summary

#### Not permitted

- Internally illuminated signs.
- More than one per building.
- Acrylic or plastic signs.
- Signs over 50mm deep.
- Box-style signs mounted directly onto the building.

#### Permitted

- One sign per building.
- Constructed from wood.
- Displayed on a metal hanging bracket.
- Size of sign in suitable scale with building.
- Signs should be no more than 600mm x 400mm.

## 4.5 Illumination of signs or advertisements

It may be desirable to have illumination of shopfronts and signs to encourage a night-time economy, but some illumination may have a negative effect on historic areas. External illumination of signs or advertisements on listed buildings, and all buildings in conservation areas, will only be permitted where it can be demonstrated that it makes a positive contribution to the preservation and enhancement of that area or building.

The amount, type and design of illumination in all cases must be sympathetic to the building and the street scene. Internally illuminated fascias, lettering and projecting box signs will not be permitted within conservation areas or on listed buildings. Illumination in the form of projecting swan necks, trough lights and spotlights can adversely affect the character of a historic shopfront by obscuring historic features and giving the façade an untidy appearance.



This type of lighting, along with internally illuminated fascias and projecting box signs will not be permitted within conservation areas or on listed buildings.

When illumination is allowed it should be creatively integrated into the façade of the building in a discrete way. The preferred method is high quality halo illumination which provides a wash of light around individual lettering. Where fascia signs are to be lit, concealed top light tubes or spotlights are an acceptable alternative, provided they are sufficiently discreet.

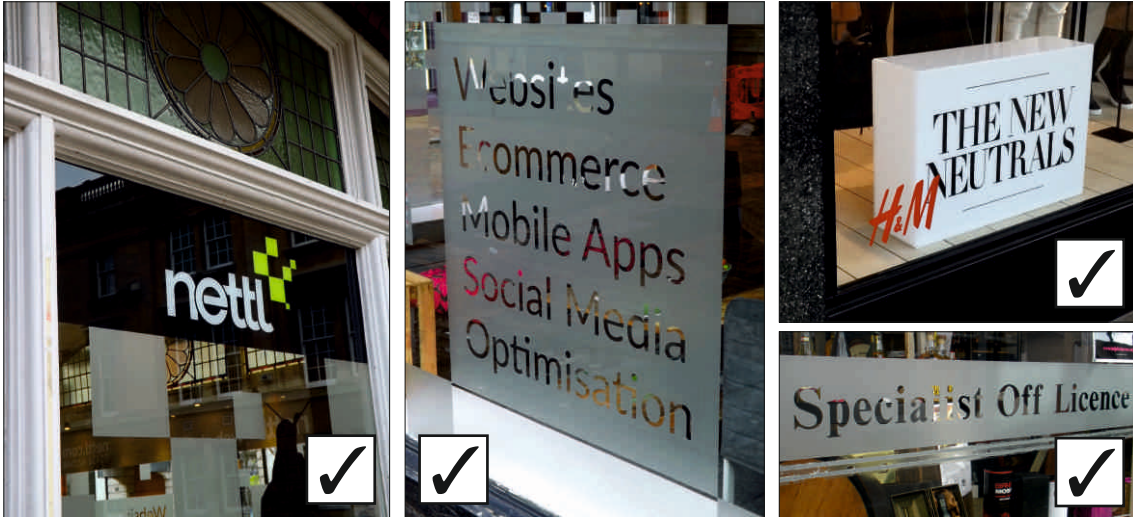
Projecting trough lights are difficult to integrate satisfactorily into a shopfront design and should not be used if they cannot be sited unobtrusively. Trough lighting may be acceptable but depends on the type of shopfront and whether this can be hidden within the fascia blind box. The Council will not permit the illumination of signs where it cannot be achieved in an appropriate manner. See page 8 for section drawing of hidden trough light detail.

Internally illuminated shop window displays may be a good alternative to illuminated signs. These types of displays can be an excellent means of advertising goods or services during and outside shopping hours, and can provide good levels of street illumination.



## 4.6 Window signs and stickers

Hand-painted signs onto the inside of window glass can be an attractive means of providing signage and advertising, especially where the design of the fascia does not provide space for the name of the business. These must be carefully designed and created by an experienced sign writer so as not to give a cluttered or untidy effect.



Frosted window stickers with signage incorporated is also an option where advertising space is limited. Street numbers should also be included as part of any design to help postal deliveries and encourage general accessibility to the property. Examples above of acceptable designs for window stickers.

However, bright window stickers, illuminated signs and posters in the windows will make the shop look cluttered and unwelcoming. De-cluttering the front of your shop can significantly improve its appearance and attractiveness to shoppers. Too many posters and notices can weaken the message you are trying to make. Shoppers may also be reluctant to enter a shop when they cannot see into it.

Window signs will not be permitted on upper floors, except for businesses operating solely on upper floors. Where appropriate and necessary, the council will take enforcement and legal action against signs or advertisements that are displayed without the required consent.

Inappropriate signs are discouraged, and where no valid planning permission exists, it may be appropriate for the council to take enforcement action.



## 5. SHOPFRONT SECURITY

The installation of grilles and shutters can have a detrimental effect on the safety and attractiveness of a street. However, the City Council acknowledges that, in some extreme cases, there is a need for shopkeepers to provide a higher level of protection against theft and vandalism than would normally be required.

### Why solid shutters are NOT acceptable

From good..

to bad..

to worse!



✓ Security glass

✓ Internal grilles

✗ External grilles

✗ Solid shutters

**Security glass** is a laminated glass that has the capacity to remain intact even when it is broken. This glass is virtually indistinguishable from ordinary glass, so is considered the most desirable option to retain the historic character of shopfronts. Security glass can provide protection against theft and may act as a deterrent against repeated acts of vandalism. The City Council encourages the use of security glass rather than grilles or shutters, especially in relation to listed buildings and properties in conservation areas.

**Internal grilles** are less damaging to the streetscape and have many of the advantages of external grilles over solid shutters. Internal grilles can be fitted behind the shop window and are retractable. These are particularly useful in buildings in conservation areas. When used in conjunction with security glass, these grilles normally provide a theft-proof shopfront security system whilst allowing visibility into the shop. This is the preferred security method and will usually be permitted, subject to the design and colour of the grille.

**External grilles** may be appropriate but only in extreme circumstances. With external grilles, the contents of the shop are still visible for window shoppers and display illuminations





can light the street. Intruders inside the shop are visible from outside which may act as a deterrent against break-ins. External grilles could be either demountable or on a roller. If the grille is on a roller, the box into which it retracts must be recessed behind the fascia board whenever possible. If this is not possible, the box should be clad in suitable materials so that it is unobtrusive.

The grille and box must be installed and operated only within the shop opening and must not cover any part of pilasters, columns or fascia. When intended for use on new shopfronts, the grille and box must form part of the overall design and be hidden behind the fascia. Care must be taken to ensure that this does not result in overly deep or projecting fascia boards.

The grille itself should be of high quality material such as brass. Otherwise, the grille should have a suitably coloured, powder-coated paint finish rather than raw aluminium. These can be acceptable if they are open in nature and designed to compliment the features of the original façade, and when the attachment brackets are designed sensitively. However, as they are removable, storage space is required for them when the shop is open.

Alarms or CCTV cameras, while useful for security purposes, can be unattractive and can detract from the appearance of the shopfront. They should be incorporated as unobtrusively as possible into the façades of the buildings. They should not be located on architectural features.

**Solid shutters** are not acceptable because they have a seriously damaging effect on the character of the street scene and shopping area. These shutters make window-shopping impossible outside shopping hours and make the streets darker by cutting out display lighting. It can be intimidating for pedestrians due to the lack of surveillance and lighting.

They also discourage pedestrian activity and as a result, lead to emptier streets. Rather than reducing crime, they can increase the opportunities for vandalism, theft and graffiti.



## 6. RECESSED ENTRANCES



Many traditional shopfronts had recessed entrances which should be retained. These entrances served the purpose of providing increased window display areas and lend greater visual interest to the façades of these properties. Several had floor tiling, often in mosaic patterns. Where the tiles exist they should be retained, and new shopfronts in the traditional style should incorporate these details.

## 7. BLINDS AND CANOPIES



Some canopies are better presented than others...

Some older shopfronts still possess their traditional pull-out blinds and these should be retained in preference to modern blinds or canopies. These traditional pull out blinds are attractive, functional and more appropriate in historic areas and on historic buildings. Blinds should not obscure architectural features and ideally they should have the ability to be retracted into a blind box above the fascia. The canopies and blinds should enhance rather than detract from the character of a streetscape.

Modern plastic, balloon-type canopies are not appropriate on traditional properties and are never acceptable in conservation areas. If they are chosen for use on modern properties elsewhere, they should not be used as additional means of advertising.

Blinds and canopies should be made of canvas, not glossy plastic. The colour of the blind or canopy should correspond to the colours of the shopfront and fascia. Bright and garish colours should be avoided. The blinds and canopies should not act as the primary sign for the shop and any lettering on them should be kept to a minimum.

## 8. CASH MACHINES

Cash machines on historic shopfronts and in conservation areas should ideally be located in internal lobbies of buildings or in the least obtrusive location on the façade.

When the machines have to be located on the façades, they should be incorporated as much as possible into the design and not to detract from the character of the building or interrupt its integrity. Cash machines in these areas should be simple in design and not have excessive advertising, signage and illumination.



## 9. BANNER ADVERTISEMENTS

Fixing or placing of banners on any property within a conservation area or listed building is not an acceptable form of advertisement. Advertisement consent will be required for banners and consent will not be granted for any banner containing direct commercial or sponsorship advertising. Fixing banners to trees or street furniture is not permitted and may be removed by the Council Enforcement Team.

The purpose of banners is to provide effective publicity for local charitable, cultural and educational events and not commercial advertising. Promotion of charity events and activities should be both appropriate and of benefit to Gloucester and the surrounding area, with minimal environmental impact.

Activities and events should serve the local population and visitors to the area without prejudice. Please check with Development Management prior to erecting any banner within a conservation area for this purpose. If a banner advertising a charity event is permitted, it should be removed within 24 hours of the event ending.

Flag advertisement outside or attached to premises is not an appropriate method of advertising. The City Council



operates a license permit for A-boards and table and chairs and the Council has produced a policy for Licensing Advertising Boards on the Highway, which took effect on 01/07/12. This is to ensure that the number, size and positioning is regulated, so that these items do not become unreasonable and create hazards for other highway users.

## 10. ACCESS AND PEOPLE WITH DISABILITIES

Wherever possible, entrances to shops should be at pavement level to allow easy access for people with wheelchairs and pushchairs. Design proposals for new shopfronts must take this into account, wherever practicable.

Widths and safety standards of doors and the positioning of door handles and letter boxes must be designed so that they are suitable for use by wheelchair bound or disabled people.

Where access cannot be provided at street level, a ramp should be provided if possible. The ramp could either be within an external entrance recess or within the shop itself. Handrails may also need to be provided.

Where appropriate, encouragement may be given to the alteration of existing shopfronts to meet the above requirements. However, if a shopfront is traditional or historic, it may not be appropriate or possible to allow these types of modifications.

If alterations neither preserve nor enhance the character of a historic building or conservation area, then more creative solutions may be required. Listed building legislation may restrict such work and discussions should be undertaken with the conservation team.



## 11. ALARMS, SATELLITE DISHES AND ANTENNAS

Security is a consideration and therefore alarms and associated boxes offer an effective crime prevention mechanism. It is recommended that the location of any alarm box required should not impact on any features of a historic shopfront and be of a colour which is not visually intrusive. If the property is listed, the alarm box will require listed building consent. Satellite dishes and antenna require planning permission within Conservation Areas on elevations which front a road and listed building consent where the property is listed.

## 12. SUBMITTING AN APPLICATION

### 12.1 What will need Planning Permission?

Most alterations to a shopfront will require planning permission. Owners are therefore advised to check with the Council before carrying out any work.

#### Planning Consent may be required for the following works:

- Construction, removal or modifications to a shopfront, including ramps and handrails.
- Changes to the external and internal security measures.
- Erection of canopies and blinds.

#### As a general rule Advertisement Consent may be required if:

- The sign or advertisement is illuminated.
- It does not relate to the shop, for example the name or type of shop, the goods sold.
- There is not a shop window in the wall on which the advertisement is displayed.
- It is above the bottom of the first floor windows.
- It is more than 4.6m off the ground.
- Any letter or feature is more than 0.75m high.

The procedures for applying for Advertisement Consent are broadly similar to those for applying for Planning Permission. Gloucester also has a number of listed buildings and any alterations proposed would require Listed Building Consent together with any planning permission and/or advertisement consent.

Separate applications will be required for Planning Permission, Listed Building Consent, Advertisement Consent and Building Regulation Approval, as appropriate. Because of the interrelationship between shop fronts and signs, it is helpful to submit applications for Planning Permission, Listed Building Consent and Advertisement Consent at the same time.

**Conservation Areas.** There are fourteen Designated Conservation Areas in Gloucester that cover most of the City centre, as well as Barton Street and parts of Hempsted and Hucclecote. Maps showing the boundaries of the existing Conservation Areas are in the City Council's publication 'Conservation Areas in Gloucester.'

**Listed Buildings.** There are 659 listed buildings in Gloucester. Listed buildings are those that have been identified as being of special architectural or historic interest, and that have been added to the National Register compiled by the Secretary of State. If a building is listed, the entire building is considered listed, not just the façade. Further guidance can be found in the City Council's publication 'Listed Buildings in Gloucester.'

If you wish to know whether a property is within a designated Conservation Area or if it is a listed building, see the Gloucester City Council website at [www.gloucester.gov.uk](http://www.gloucester.gov.uk)

If you are planning to make alterations to your building, you are advised to seek the advice of the Conservation Officers at a very early stage. Please be aware that you will need to allow time for any necessary application to be approved before you can begin work. In this

way, you will avoid any danger of enforcement action or prosecution. The council offers a formal pre-application service and early discussions are advised with the Planning Department.

**Enforcement.** It is important that you apply for any necessary permission as you may leave yourself at risk of enforcement action being taken against you by the Council. Advertisements, alterations or building works that are carried out without consent may have to be removed if the Council takes enforcement action. This could involve a variety of approaches depending on the scale of the works, but could include the Council completing the works and recharging the cost back to the owner. This charge will be placed as a charge against the owner until such time as paid. The Council will also consider whether or not to prosecute the owner and/or administer a simple caution.

**Building Regulations.** You will need approval under Building Regulations to carry out many types of building work. Such approval is very likely to be relevant for work to shop fronts, and advice should be sought from Gloucester City Council's Building Control Officers.

## 12.2 How to submit a Planning Application

In order to submit an application so that the construction or alteration can be authorised, you must supply drawings of the proposed work as part of any submitted application to Gloucester City Council.

### The required drawings should include the following:

- A floor plan.
- An elevation of the shopfront, showing the whole of the building and the buildings on either side at 1:50.
- Vertical sections through the shopfront.
- Details of advertisements and signs.
- Details of illumination (if any).
- Large scale drawings of the details of the shopfront such as the pilasters, corbels, cornice, stall riser at 1:20.
- Details of the materials to be used.
- Details of the finishes, such as paint colour.
- Full constructional details for the carpenter, joiner or builder.

We recommend that those wishing to make alterations employ an architect or designer who is experienced and knowledgeable in shopfront construction and design.

The choice of the builder, joiner or carpenter is very important. We advise that those hiring these individuals examine the work that they have done previously to ensure that they are capable of good quality workmanship.

### 13. THE PROCESS CHECKLIST

1. Be clear about what you want to achieve. New shop window? New sign? Complete new shopfront?
2. Talk to the Council about your proposals.
3. When your plans are developing, meet with the Council to discuss the details (and possible grant aid).
4. Find out which consents you need.
5. Ask for advice about contractors who could carry out the work to the correct standard.
6. Find a professional architect or designer who understands your needs and the limitations of conservation areas. Give them a copy of this Design Guide.
7. Prepare the required drawings and other information for your applications.
8. Be prepared to amend or justify your plans if they depart from this guide.

Application forms are available to download from the City Councils website, please see the planning section at [www.gloucester.gov.uk](http://www.gloucester.gov.uk). Certain demolition work may also require Building Regulation Approval and Listed Building Consent.

The City Council offers a pre-application service providing advice and guidance regarding applications within designated conservation areas and listed buildings and it is recommended this is undertaken.

If you have any doubts, please contact the Council's Development Management Team and Building Control Team.

Further information can be found on the Gloucester City Council website:

[www.gloucester.gov.uk](http://www.gloucester.gov.uk)



## Contacts

### Historic Environment

T: 01452 396855

E: [Heritage@gloucester.gov.uk](mailto:Heritage@gloucester.gov.uk)

### Building Control

T: 01452 396771

E: [buildingcontrol@gloucester.gov.uk](mailto:buildingcontrol@gloucester.gov.uk)

### Development Management

T: 01452 396775 or 396776

E: [development.control@gloucester.gov.uk](mailto:development.control@gloucester.gov.uk)

### Help with accessing this information

[www.gloucester.gov.uk](http://www.gloucester.gov.uk)

E: [Heritage@gloucester.gov.uk](mailto:Heritage@gloucester.gov.uk)

If you, or someone you know cannot understand English and needs help with this information, or if you would like a large print, Braille, or audio version please call 01452 396396.



# Gloucester City Council

<b>Meeting:</b>	<b>Planning Policy Sub-Committee Council</b>	<b>Date:</b> 4 September 2017 28 September 2017
<b>Subject:</b>	<b>Gloucester Public Realm Strategy</b>	
<b>Report Of:</b>	<b>Anthony Wilson, Head of Planning</b>	
<b>Wards Affected:</b>	<b>Westgate</b>	
<b>Key Decision:</b>	<b>Yes</b>	<b>Budget/Policy Framework: No</b>
<b>Contact Officer:</b>	<b>Charlotte Bowles-Lewis (Principal Conservation and Design Officer) Tel. 396855</b> <a href="mailto:charlotte.bowles-lewis@gloucester.gov.uk">charlotte.bowles-lewis@gloucester.gov.uk</a> <b>Claire Haslam (Principal Planning Officer) Tel. 396825</b> <a href="mailto:claire.haslam@gloucester.gov.uk">claire.haslam@gloucester.gov.uk</a>	
<b>Appendices:</b>	<b>1. Gloucester Public Realm Strategy</b> <b>2. Consultation responses report</b>	

## FOR GENERAL RELEASE

### 1.0 Purpose of Report

- 1.1 This report seeks agreement to allow the Gloucester Public Realm Strategy to be adopted by the Council as a Supplementary Planning Document.
- 1.2 The Public Realm Strategy will be used to support the regeneration of the City and will form part of the evidence base for the City Plan in due course. This document will also be used in the Development Management process to ensure schemes are of a high quality and preserve and enhance the character and appearance of the historic environment.

### 2.0 Recommendations

- 2.1 Planning Policy Sub-Committee is asked to **RECOMMEND TO FULL COUNCIL:**
- (1) That the Gloucester Public Realm Strategy be approved for adoption as a Supplementary Planning Document.
- 2.2 Full Council is asked to **RESOLVE:**
- (1) That the Gloucester Public Realm Strategy be approved for adoption as a Supplementary Planning Document.

### 3.0 Background and Key Issues

- 3.1 The public realm within Gloucester has developed and changed over the 1900 years since the founding of the original Roman settlement, and continues to change as part of the various regeneration and redevelopment projects within the City.
- 3.2 There have been a series of significant public realm projects completed in recent times. The Gloucester Quays retail outlet opened in 2009 and part of that development saw the provision of very high-quality areas of new public realm. The Linkages project (the route from Gloucester Quays to the City Centre) saw the redevelopment of the public realm along the eastern side of Victoria Dock and the area around Kimbrose Triangle, Commercial Road and Southgate Street, during 2010. An area of approximately 16,200 metres sq. was covered by these two projects, which have raised the overall level of public realm quality considerably.
- 3.3 Proposals for other significant public realm projects are being developed, including for the open spaces within the Bakers Quay mixed use development, Orchard Square (part of the Docks area), the new bus station, and within the Cathedral Precincts (part of Project Pilgrim). There are also emerging plans for other strategic sites, including the former Gloucester Prison and the adjacent Greater Blackfriars area.
- 3.4 Much of the existing older public realm within the Gate Streets and other parts of the wider City Centre, dates back to the early to mid 1990s, which is now around 25 years old. The emergence of the recent public realm projects has highlighted the dated nature of much of the existing public realm provision within the City Centre, but also the need to provide guidance for new public realm proposals as they emerge. It is important to support the emerging public realm projects with specific guidance on appropriate materials, areas for improvement and broad design principles.
- 3.5 A six week period of public consultation was carried out from 15 March to 26 April, 2017. An information and summary leaflet was produced as part of that process which summarised the main aspects of the strategy. Digital e-alerts were sent out to nearly 7,000 subscribers and more than 400 letters were posted to the City Plan consultation database. Consultation packs, including a printed and bound copy of the draft strategy, accompanying leaflet and response forms, were provided to all the public libraries in Gloucester, as well as to the Guildhall and the City Council's Reception.
- 3.6 There were a total of 16 responses to the consultation, including representations from the CPRE, Historic England, Natural England, Gloucestershire Constabulary, Canal & River Trust, Gloucestershire County Council and White Young Green (WYG) on behalf of Gloucester Quays LLP.
- 3.7 The response report in Appendix 2, sets out all of the consultation representations which were received as part of the public consultation exercise. The report sets out which parts of the draft consultation document have been amended and the reasoning for these alterations. The vast majority of alterations concern minor graphical or layout issues, with the layout of section 5.5 onwards being altered to reduce the amount of blank areas on pages and to reduce the overall length of the document. The Category of Spaces plan has also been amended with the addition

of a number of labels which identify landmarks within the City Centre, as set out in the promotional leaflet which formed part of the public consultation.

3.8 The most significant alteration has been the addition of a number of paragraphs, within chapters 1, 3 and 4, which caveat the use of the term 'public realm' applied to existing areas of private land. Examples include Baker's Quay and Gloucester Quays, The Docks and the Cathedral Precincts. While supportive of the aims of the Strategy, the representation did raise an objection specifically relating to the private areas of land owned by Gloucester Quays LLP. The representation did suggest a number of potential alterations and the response report clarifies which of the suggestions have been followed. A number of paragraphs have been added which explain which areas are specifically privately owned, but which for the purposes of the Public Realm Strategy, are identified within the document as 'public realm'.

3.9 Overall, a range of comments have been provided through the public consultation process, which have led to improvements to the document. It is recommended that the Gloucester Public Realm Strategy is adopted as a Supplementary Planning Document to ensure public realm schemes are of a high quality and preserve and enhance the character and appearance of the historic environment.

#### **4.0 Asset Based Community Development (ABCD) Considerations**

4.1 The aim of the document is for members of the public, consultants, Council officers and developers to be able to use the guide to assist with informing the design of public realm schemes within the City Centre as part of any development management or strategic project. This guidance will help ensure that schemes are well considered and meet the City Council's requirements leading to a better quality environment.

#### **5.0 Alternative Options Considered**

5.1 Failure to recommend these documents for public consultation would result in the City Council not providing a positive and pro-active approach to regeneration within City. This positive approach is also recommended with the National Planning Policy Framework and would also form part of the evidence base for the forthcoming City Plan. The work will also feed into the City Plan development control policies.

#### **6.0 Reasons for Recommendations**

6.1 The Gloucester Public Realm Strategy has been developed to help support the regeneration of the city centre and will form part of the evidence base for the City Plan in due course. The strategy is recommended for adoption as a Supplementary Planning Document, as this will provide strong and clear planning guidance to be used in the Development Management process to ensure schemes are of a high quality, which preserve and enhance the character and appearance of the historic environment.

#### **7.0 Future Work and Conclusions**

7.1 Following adoption of the Gloucester Public Realm Strategy, proposed public realm projects will be guided by the principles and suggestions set out in the document. It is also intended that the strategy will form part of the evidence base for the

emerging City Plan, which will support the continuing provision of high quality areas of public realm, for the benefit of local residents and businesses, as well as visitors to Gloucester.

## **8.0 Financial Implications**

- 8.1 The progression of wider public realm improvements within the City Centre would require a significant financial commitment that would need to be carefully assessed and programmed within the Council's overall budget. As with all capital projects any public realm improvement project would be required to identify sources of funding to enable the project to be delivered.
- 8.2 The document sets out various paving materials and items of furniture to be used for each of the identified main categories of spaces. These materials are intended to be indicative and represent a guide to the quality standard which is suitable. There is a cost implication for the higher quality materials, such as natural sandstone or granite, but there is also an element of cost saving over the lifetime of the scheme due to the increased robustness of these materials.

(Financial Services have been consulted in the preparation this report.)

## **9.0 Legal Implications**

- 9.1 Following the adoption of the Gloucester Public Realm Strategy as a Supplementary Planning Document, the Public Realm Strategy will become a material consideration in planning terms. The document can then be used to guide the design and implementation of public realm within the City, to enable the Council to promote high standards of design leading to a better quality environment.

(One Legal have been consulted in the preparation this report.)

## **10.0 Risk & Opportunity Management Implications**

- 10.1 A low risk has been identified as a result of this report. This low risk involves the possibility that the Public Realm Strategy is not adopted as a Supplementary Planning Document and therefore the quality of public realm within the City being adversely affected.
- 10.2 The main opportunity is to achieve higher standards of public realm if the document is adopted as a Supplementary Planning Document.

## **11.0 People Impact Assessment (PIA):**

- 11.1 The aim of the Public Realm Strategy is for members of the public, consultants, developers and City Council Officers to use the guide to assist with informing the design of the public realm within the City as part of any development management scheme. This guidance will ensure that schemes are well considered and meet the City Council's requirements leading to a better quality environment.
- 11.2 The PIA Screening Stage was completed and did not identify any potential or actual negative impact, therefore a full PIA was not required.

## 12.0 Other Corporate Implications

### Community Safety

- 12.1 There are a number of recommendations and issues identified in the Public Realm Strategy which could have implications for community safety, were these recommendations not put into practice. However, the process of adopting the Gloucester Public Realm Strategy as a Supplementary Planning Document has no community safety implications. There are however a number of positive implications for the overall quality of the public realm, including the safety of the general public, if the Gloucester Public Realm Strategy is adopted as a Supplementary Planning Document. Section 4.9 of the document (design affecting visually impaired, disabled and elderly groups) deals generally with safety issues and sets out a range of principles.

### Sustainability

- 12.2 The Public Realm Strategy supports the process of achieving sustainable development and will contribute to the improvement of the city centre for both residents and visitors to Gloucester. The document when adopted would ensure proposals have a positive impact on the environment of Gloucester.

### Staffing & Trade Union

- 12.3 No impacts.

Potential Media Interest – to be completed for SMT/Cabinet Briefing purposes. Remove prior to publication of report. Draft report to be sent [pressoff@gloucestershire.gov.uk](mailto:pressoff@gloucestershire.gov.uk).

**Background Documents:** None

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GLOUCESTER  
PUBLIC REALM STRATEGY  
2017



Published by:



Herbert Warehouse  
The Docks  
Gloucester GL1 2EQ  
01452 396847

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# Executive Summary

The public realm belongs to everyone, it is part of our everyday lives and it is where we move and meet on a daily basis. It is the places we pass through on our journeys and the spaces we use for outdoor activities and social interaction.

Public realm shapes the image of the places we inhabit, it creates identity and distinctiveness and influences how others see us. Public realm comprises the streets, squares, parks, green spaces and other outdoor places that require

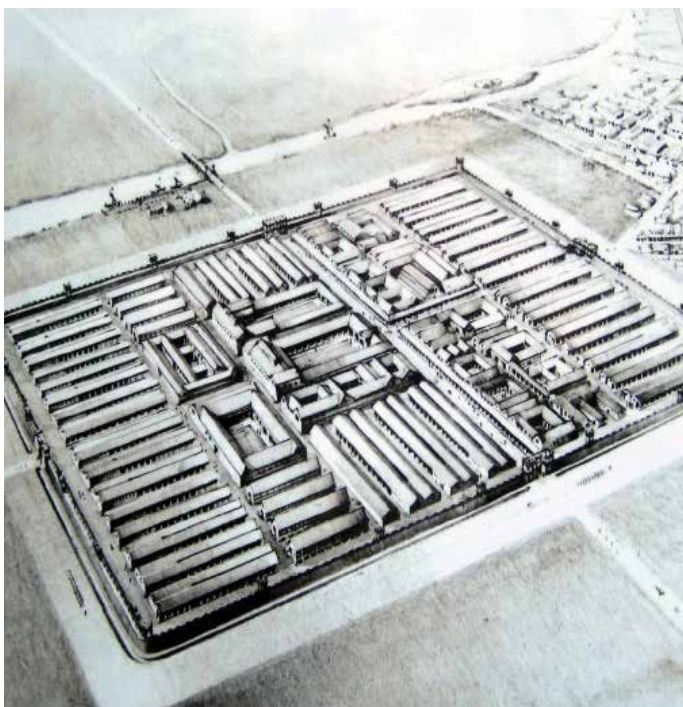
no key to access them and are available, without charge for everyone to use.

The Gloucester Public Realm Strategy sets out a number of guiding principles which should be used to improve the public realm within the City Centre. The strategy should be used not just when designing major redevelopment sites, but also in the day-to-day maintenance of the existing public realm within the City Centre.

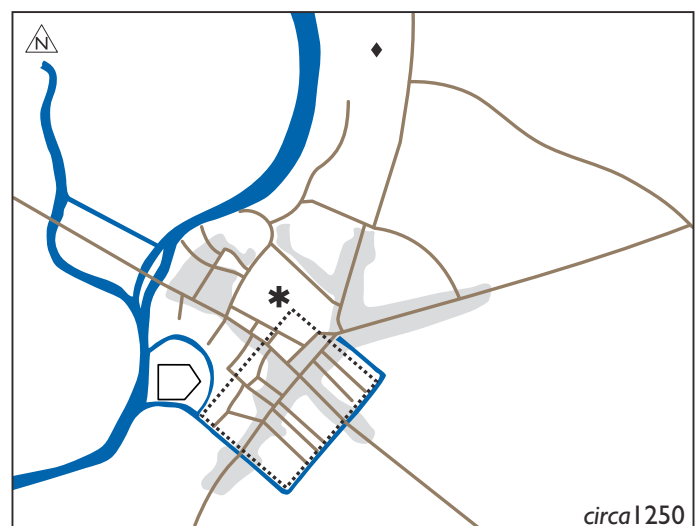
The fundamental structure of the historic core of Gloucester has remained almost intact since the original Roman settlement was established around 90AD (over 1900 years ago). The principal routes within

the core of the city, including the Gate Streets and connected streets, provide much of the historic character found in the centre. The Cathedral and the areas surrounding it provide some of the highest quality architecture in the

city. The later addition of the Docks and Quays, which was made possible by the opening of the Gloucester and Sharpness Canal in 1827, provides another focus for tourism and identity for the city.






Drawing by Phil Moss (1st Century Gloucester)

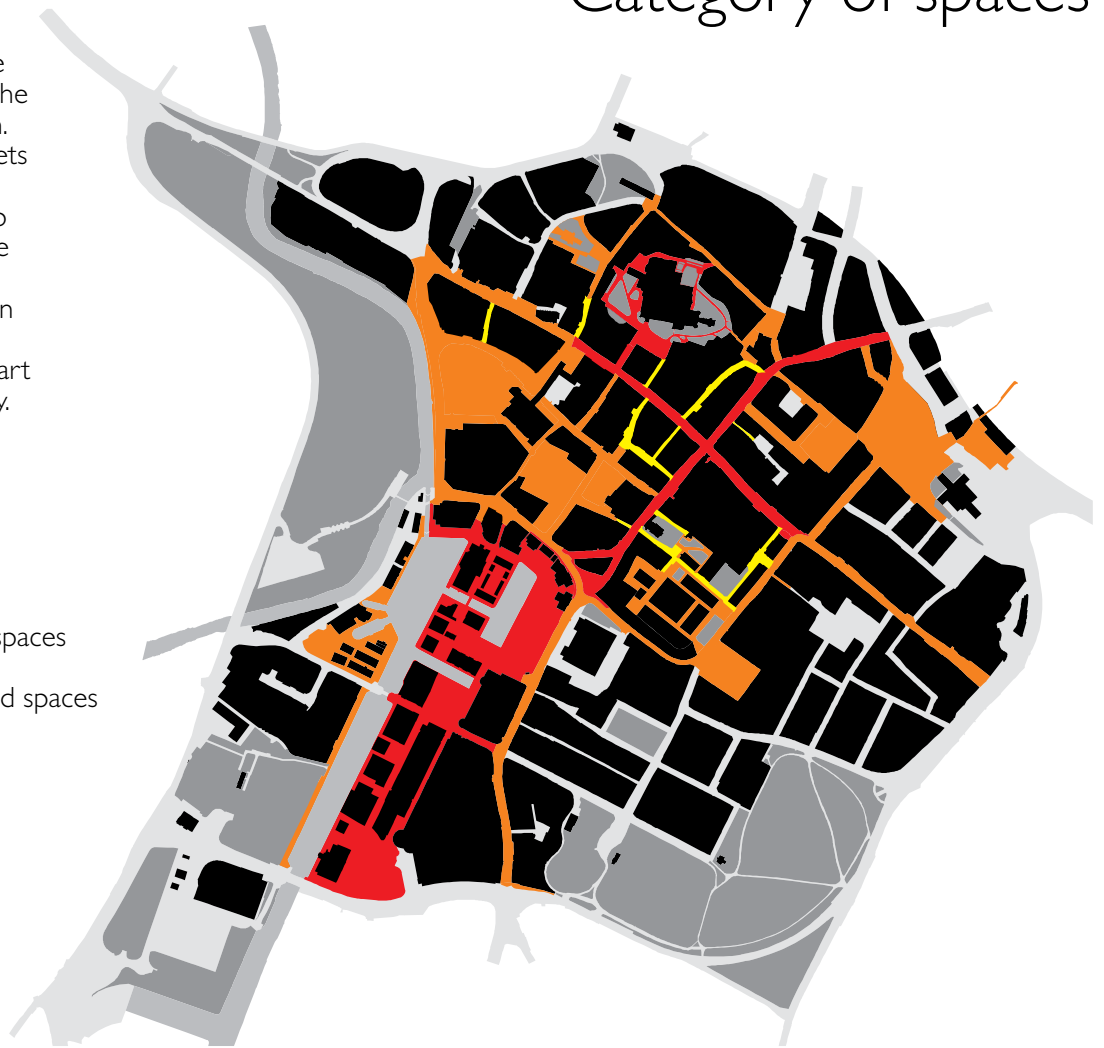


- Known occupied areas
- Aquaduct
- Roman Colonia
- Priory
- ✱ Cathedral
- Manor

The Cathedral and its precincts, the Gate Streets and the Docks and Quays areas, combine to form the most important focus for the highest quality public realm. A series of secondary streets and spaces surround these primary areas and make up the rest of the historic core of the City. These streets and spaces are important in their own right and all are considered important as part of the character of the City.

## Category of spaces

-  Lanes
-  Primary streets and spaces
-  Secondary streets and spaces



High quality materials are required to create areas which people want to live in and experience every day, and which visitors to Gloucester will appreciate and which will help to support the city's economy and prosperity.



Public realm examples

# I. Introduction

The public realm belongs to everyone, it is part of our everyday lives and it is where we move and meet on a daily basis. It is the places we pass through on our journeys and the spaces we use for outdoor activities and social interaction.

Public realm shapes the image of the places we inhabit, it creates identity and distinctiveness and influences how others see us. Public realm comprises the streets, squares, parks, green spaces and other outdoor places that require no key to access them and are available, without charge for everyone to use.



1.1 High quality public realm should not be considered a 'desirable' element of regeneration: it must be an essential ingredient. The quality of our public realm is vital if we are to be successful in creating environments that people want to live and work in.

1.2 Good quality public realm is not just an aesthetic issue concerned with making places look good. There are fundamental financial, crime, health and civic pride elements involved, all of which contribute to the quality of life experienced by residents and visitors to Gloucester.

*'Places and streets that have stood the test of time are those where traffic and other activities have been integrated successfully, and where buildings and spaces, and the needs of people, not just of their vehicles, shape the area.'* (Manual for Streets, Department for Transport, 2007)

1.3 The Council supports innovative and attractive development within Gloucestershire. The NPPF states that developments should establish a strong sense of place, using streetscapes to create attractive and comfortable places to live, work and visit. (Para 2.5, p.16)

1.4 In recent years, Gloucester has begun to regenerate, with high-quality new developments including the Gloucester Quays, Docks public realm improvements, new developments within the Docks area, the Linkages project which transformed the Southgate Street and Kimbrose Triangle areas, the Greyfriars housing development and numerous smaller projects.

1.5 Regeneration is continuing and redevelopments including the Kings Quarter, the former Gloucester Prison site and the Greater Blackfriars area all have the potential to make significant contributions to the quality of the City Centre. The public realm within and surrounding these major development sites will play a key role in creating high-quality areas which improve the lives of residents and visitors to Gloucester.

1.6 This Public Realm Strategy ('the strategy') sets out a number of guiding principles which should be used to improve the public realm within the

City Centre. The strategy should be used not just when designing major redevelopment sites, but also in the day-to-day maintenance of the existing public realm within the City Centre.

1.7 The Public Realm Strategy is not a land use planning document and does not seek to redefine any 'private' areas of land within the strategy area as 'public'. The aim is to set out a broad range of design principles to enhance the quality of Gloucester's public realm and to provide additional guidance to supplement the emerging Joint Core Strategy and Gloucester City Plan.

1.8 The Gloucester Public Realm Strategy has been developed in consultation with local stakeholders, and following a 6 week period of public consultation, has been adopted as Supplementary Planning Document.

1.9 It is intended that further detailed design work will be carried out in areas identified by the strategy as needing improvement and that the design principles identified in this strategy guide this future work.

1.10 There are already many positive aspects to Gloucester's public realm and many opportunities for significant improvements. The linked public realms of the Quays, Docks and Kimbrose Triangle/Southgate Street have set the level of quality to a high standard which should be the benchmark for future public realm schemes.

Strategy objectives:

To develop a coherent and high quality approach to the public realm within the City Centre, based on reducing clutter and providing high quality materials

Develop principles which will enhance the safety and security of people using Gloucester's public realm

To improve the appearance of the Gate Streets and historic areas and improve the setting of heritage assets

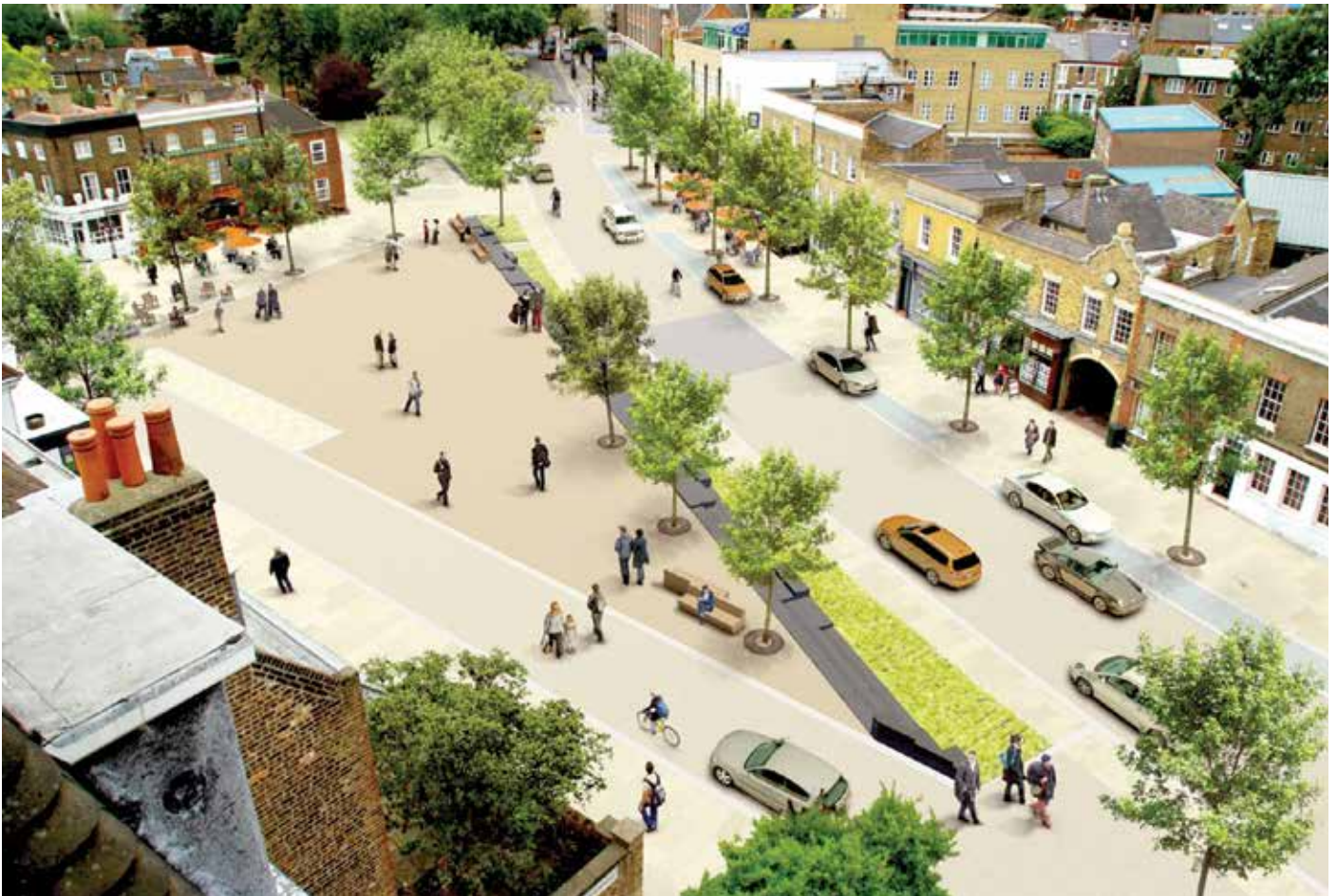
To reduce the amount of clutter and rationalise or combine street furniture

Improve the legibility of Gloucester City Centre through the use of a coordinated palette of materials, clear signage and street furniture

To develop and set out a range of public realm principles, upon which further detailed public realm schemes will be based

To recognise the needs of all groups who use the City Centre and to develop clear design principles based on these needs

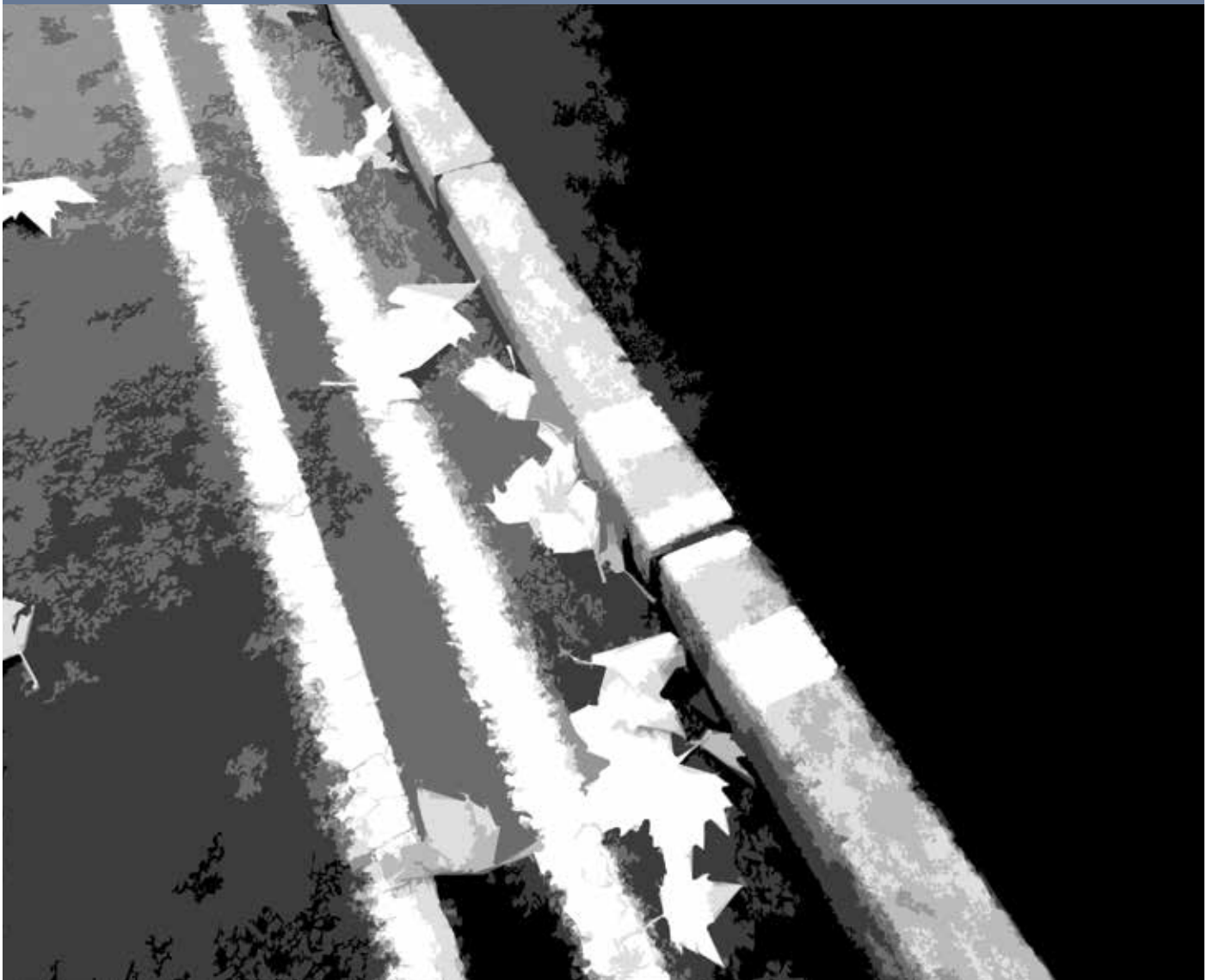
To enhance the connections between major land uses and areas of activity.



Clapham Old Town, existing and proposed images.  
Project design by Urban Movement [http://www.urbanmovement.co.uk/clapham-ot\\_projects\\_urd.html](http://www.urbanmovement.co.uk/clapham-ot_projects_urd.html)

## 2. Policy background & context

The creation of areas of high-quality public realm is supported by national and local planning policy and guidance, which has informed the content of the strategy.



## 2.1 National policy & guidance

2.1.1 The National Planning Policy Framework (NPPF) came into effect on 27th March 2012 and sets out the Government's approach towards planning and sustainable development. The document sets out how the planning system should facilitate sustainable development, by contributing to building a strong, responsive and competitive economy, by supporting strong, vibrant and healthy communities, and by contributing to protecting and enhancing our natural, built and historic environment.

2.1.2 The NPPF highlights the importance of creating a good quality built environment, ensuring the vitality of town centres, promoting sustainable transport, promoting healthy communities, and conserving and enhancing the historic environment.

2.1.3 Part 7 of the NPPF sets out how development should take available opportunities to improve the character and quality of an area and the way it functions. It supports good design and good quality streets & spaces which are safe and accessible.

2.1.4 The National Planning Practice Guidance sets out how the policies in the NPPF are to be implemented and contains numerous relevant notes on the need to promote high quality design, including areas of public realm.

*'Successful streets are those where traffic and other activities have been integrated successfully, and where buildings and spaces, and the needs of people, not just of their vehicles, shape the area.'*

*In many cases shortcomings in street design reflect the rigid application of highway engineering standards in terms of road hierarchies, junction separation distances, sight lines and turning radii for service vehicles. The result is often a sense of sprawl and formlessness and development which contradicts some of the key principles of urban design.*

*Imaginative and context-specific design that does not rely on conventional standards can achieve high levels of safety and amenity. Each street should be considered as unique – understand its location, character and eccentricities.*

*Designs should relate to these local characteristics, not to something built elsewhere.' (NPPG, Paragraph 042)*

2.1.5 One of the primary objectives of the Public Realm Strategy is to reduce unnecessary clutter within the public realm. Paragraph 042 of the National Planning Practice Guidance states the following:

*'Every element of the street scene contributes to the identity of the place, including for example lighting, railings, litter bins, paving, fountains and street furniture. These should be well designed and sensitively placed.'*

*Unnecessary clutter and physical constraints such as parking bollards and road humps should be avoided. Street clutter is a blight, as the excessive or insensitive use of traffic signs and other street furniture has a negative impact on the success of the street as a place.'*

*The removal of unnecessary street clutter can, in itself, make pavements clearer and more spacious for pedestrians, including the disabled, and improve visibility and sight lines for road users. Street signs should be periodically audited with a view to identifying and removing unnecessary signs.' (NPPG, Paragraph 042)*

2.1.6 National policy is clear that good design is a fundamental part of the planning process.

*'Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design.'*

*Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.*

*'Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.'*

The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre.' (NPPG, Paragraph 007).

2.1.7 Manual for Streets 1 (DfT March 2007) and Manual for Streets 2 (DfT September 2010), are the primary Highways policy guides and support the creation of quality streets.

2.1.8 The 2007 CABE document 'Paved with Gold: The Real Value of Good Street Design', in particular sets out various key aspects for the design of quality streets.

- Dropped kerbs, tactile paving and colour contrast
- Smooth, clean, well-drained surfaces
- High-quality materials, high standards of maintenance, including pavements wide enough to accommodate all users with no pinch points
- Potential obstructions placed out of the way and enough crossing points in the right places
- Traffic levels not excessive
- Good lighting and a sense of security with no graffiti or litter, with no signs of anti-social behaviour
- Signage, landmarks and good sightlines with public spaces along the street resulting in a street that is a pleasant place to be.



## 2.2 Local policy and guidance

2.2.1 There are a number of important local policies relating to the design of the public realm. 'Manual for Gloucestershire Streets' (Gloucestershire County Council, June 2013) sets out the various technical and design standards relating to roads and streets within the county.

2.2.2 'Gloucestershire County Council Enhanced Materials Policy' (October 2010) sets out the types of materials which are acceptable to ensure safety and ease of maintenance, but which are of a higher quality than the standard range of highways materials, such as tarmac.

This allows enhanced and often more locally distinctive materials to be used within adopted highways, with commuted sums generally being collected to allow for future maintenance over the 'whole life' of an area's materials.

2.2.3 The 4th Edition of Manual for Gloucestershire Streets (April 2016), sets out a range of criteria and guidance on the design of Highways areas.

2.2.4 The Joint Core Strategy (November 2014) is at the Submission stage of its development and is now a material consideration in determining planning applications and guiding the design of developments within its boundary.

2.2.5 Policy SD5 (Design requirements) within the emerging JCS sets out policies relating to the design of public realm. Table SD5b sets out specific design principles, including the design of public realm.

2.2.6 The Gloucester City Council 'Second Stage Deposit Local Plan 2002' provides policy guidance on design issues, including proposals for landscaping, the appearance of developments, the impact of

developments on the character and quality of an area and the need to reinforce local distinctiveness in the long term. The emerging Draft City Plan will replace the 2002 Local Plan and has specific policies on public realm quality and design.

2.2.7 The City Centre Conservation Area Appraisal has a number of policies relating to public realm and this document should be considered during the development of any public realm project within the City Centre.

2.2.8 It is intended that the strategy will form part of the emerging Gloucester City Plan, and has been adopted as a Supplementary Planning Document.

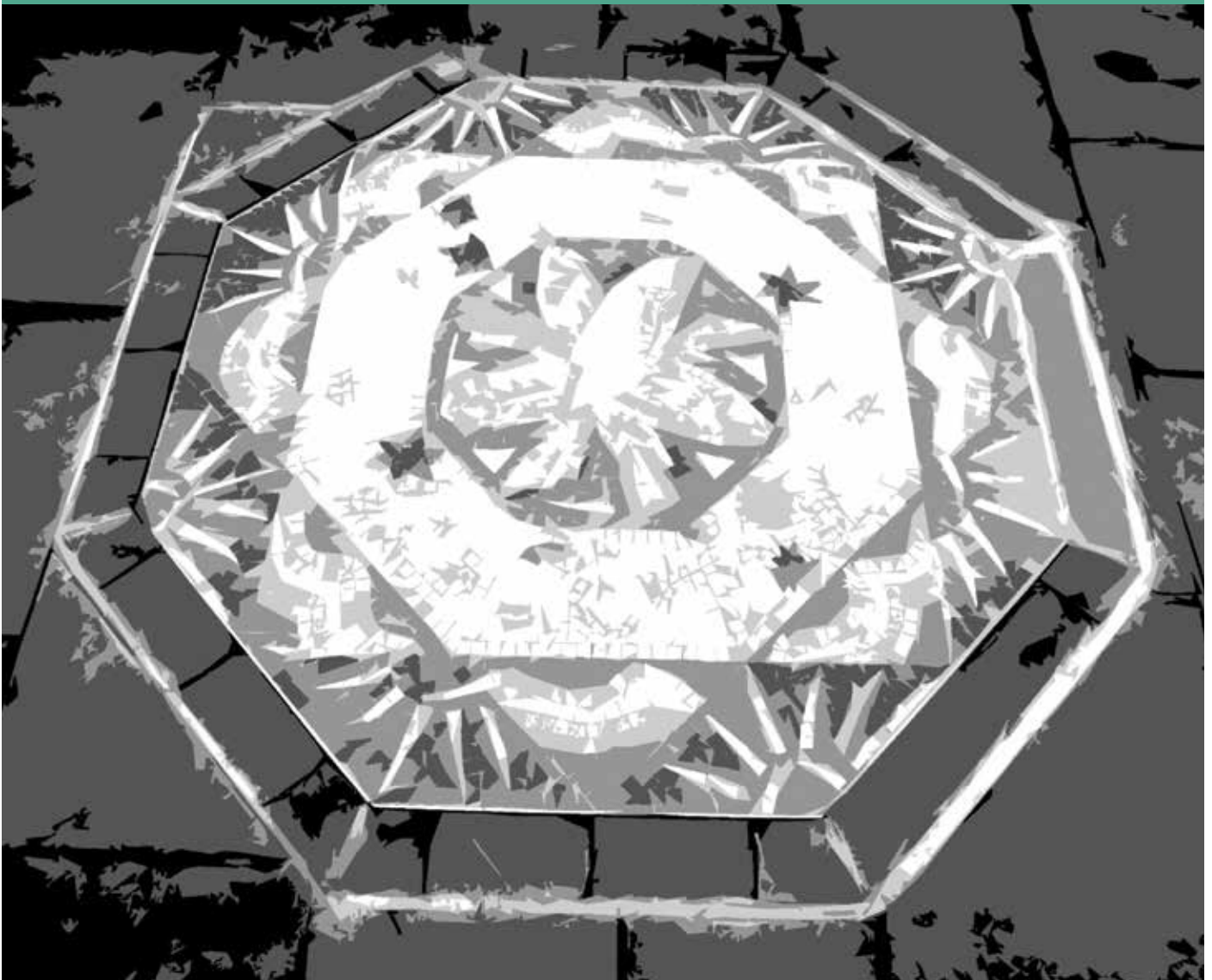
**Table SD5a**

### Hierarchy of Transport Modes

Highest	<ol style="list-style-type: none"> <li>1. Pedestrians and people with mobility difficulties</li> <li>2. Cyclists</li> <li>3. Public transport and social/community services</li> <li>4. Access by commercial vehicles</li> <li>5. Ultra-low emission vehicles</li> </ol>
Lowest	<ol style="list-style-type: none"> <li>1. Other motorised vehicles</li> </ol>

# 3. Public realm analysis and strategy area

In order to be able to propose appropriate improvements to Gloucester's public spaces, it is first essential to analyse and understand the way in which the public realm in Gloucester is formed and used, what the character of the place is and what the positive and negative aspects of the existing public realm include.



### 3.1 Public Realm Strategy area

3.1.1 The focus for the strategy is the centre of Gloucester, including the historic core, areas around the train and bus stations, the Docks, and the Gate Streets. A plan showing the extent of the area is below.

This general area includes some of the most important historic sites in the city, as well as the main areas of employment and activity.

3.1.2 This central area also holds the most important redevelopment sites within Gloucester and will have a significant impact on the overall character and perception of the city. The central area also forms the anchor of the sequence of spaces from the Gate Streets, via the Docks, to Gloucester Quays.

3.1.3 Further public realm recommendations and strategies are encouraged for areas outside of the central core of the city but the recommendations contained in this strategy are specific to the central area.

### 3.2 Historic development pattern

3.2.1 The area chosen for the focus of the strategy also relates to the historic development pattern of the city, dating back to the establishment of the original Roman city of Glevum in the late 90's AD.

3.2.2 The Roman City at Gloucester (Glevum) was established on the site of the fort around 90AD and the city walls follow exactly the layout of the earlier fortress. The fundamental principles of Gloucester's layout were established at this time, and many elements remain, over 1900 years after they were established.

3.2.3 Very little is known about the development of Gloucester immediately after the Roman period (between 410 and 700AD) and the city may have been wholly or partly abandoned during this period. But by the 8th and 9th centuries Gloucester was certainly re-established as a settlement and by the end of 10th century was an important town and fortress.

3.2.4 Following the Norman conquest the City Centre underwent a number



of quite profound changes. St Peter's Abbey obtained lands outside the walls – extending the Abbey Precinct to Pitt Street in the north and St Mary's Street in the West. In doing so the north-west corner of the Roman walls was removed entirely.

3.2.5 In the south west of the city the construction of a Norman castle was followed swiftly by the creation of a large stone castle on the site of what is now the prison. For much of the medieval period the area around the castle was kept empty, hence the name 'Bearland'.

### 3.3 Character areas

3.3.1 There are a number of distinct character areas within the strategy area, notably formed through the distinct areas of the Cathedral and its precincts, the clear pattern and fairly continuous character of the central Gate Streets, the King's Quarter area which includes the train and bus station sites.

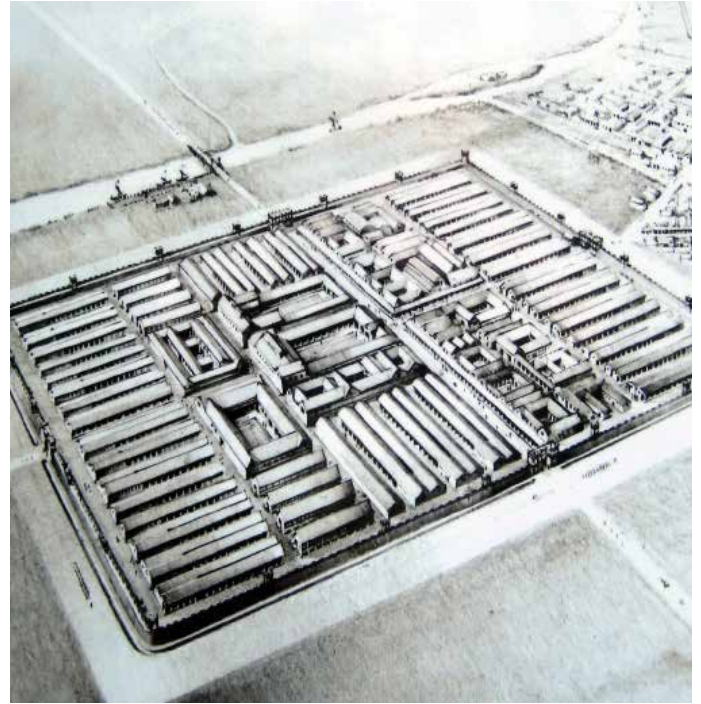
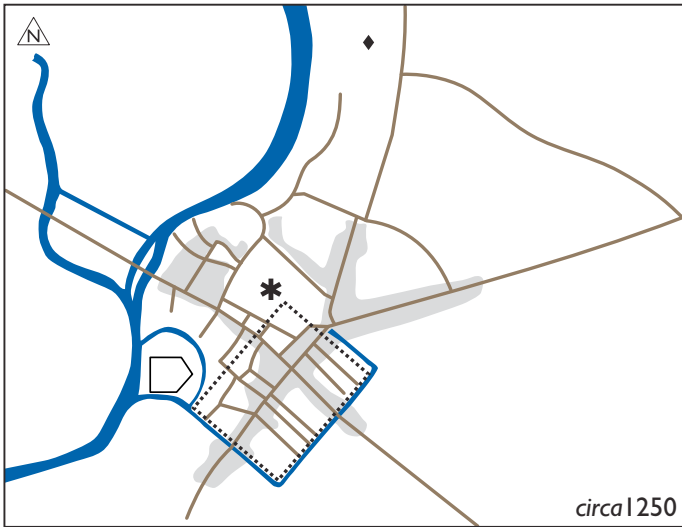
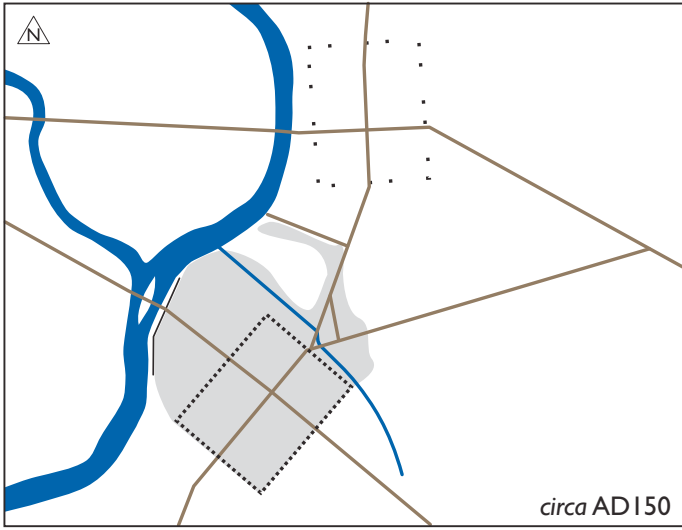
The Greater Blackfriars area is also included, which lies between the Westgate Street / Southgate Street boundary and the Docks (including the former prison site) and the Greyfriars area.

3.3.2 Areas which lie just outside the strategy area include the Spa, Park area and St. Oswald's Park. Detailed public realm proposals which follow the general principles set out in this strategy could be extended into these areas.







3.3.3 The distinctions between character areas can be used as the basis for proposing variations in overall and detailed public realm treatments, including types of materials and carriageway widths. This response to the local context is an important aspect of developing a style for new public realm projects which enhances and builds on the positive and distinctive aspects of the City Centre.

## Historic maps

The plans below set out the historic development pattern of Gloucester through the various time periods, including settlement areas, streets, river course and emergence of The Docks.



Drawing by Phil Moss (1st Century Gloucester)

- |   |                      |   |          |
|---|----------------------|---|----------|
|  | Known occupied areas |  | Aqueduct |
|  | Roman Colonia        |  | Priory   |
|  | Cathedral            |  | Manor    |

# Key Arrival Points and Car Parks



## KEY ARRIVAL POINTS

- 1 Railway Station
- 2 Bus Station
- 3 Bus Stops
- 4 The Quays
- 5 Gloucestershire Royal Hospital
- 6 Asda
- 7 Go Outdoors



## CAR PARKS

- 8 Southgate Moorings
- 9 Blackfriars (Barbican)
- 10 Blackfriars (Ladybellegate)
- 11 Longsmith
- 12 Westgate
- 13 Hare Lane
- 14 King's Walk
- 15 Eastgate
- 16 Train Station
- 17 Bruton Way
- 18 Hampden Way
- 19 St. Michael's Square

### 3.4 Arrival points

3.4.1 Arrival points into the centre of Gloucester are one of the key project areas for any regeneration or public realm improvement programme or strategy, given that these are the places which provide access into the central area and also where people will get their important first impressions of Gloucester, particularly important for visitors and for resident's daily experiences.

3.4.2 Providing efficient, appealing and highly legible arrival points, particularly regarding the major transport nodes such as train or bus stations, is one of the more important ways that any urban area can improve the overall experience of a place, for residents and visitors alike.

3.4.3 The importance placed on each transport type within this strategy broadly aligns with the following sequence, with the most important at the top. This is set out within Policy SD5 (Table SD5a - Hierarchy of Transport Modes), of the Joint Core Strategy.

1. Pedestrians and people with mobility difficulties
2. Cyclists
3. Public transport and social/community services
4. Access by commercial vehicles
5. Ultra-low emission vehicles
6. Other motorised vehicles

3.4.4 A significant proportion of the strategy area is at least partly pedestrianised and the safety and ease of movement of pedestrians should be one of the key principles.

3.4.5 The map opposite shows the various arrival points which are located either within the strategy area or which directly border the area. These are described below.

#### 3.4.6 Train station

Located just within the eastern boundary of the strategy area, the train station provides local, regional and national connections, and is on the mainline to London. At present, the quality of the train station and its immediate surroundings is poor, with a limited physical connection across Bruton Way (the A430), towards the bus station and City Centre, and an overall appearance which is cluttered

and negative. There is significant potential to create a welcoming and high quality arrival point.

#### 3.4.7 Bus station

The existing bus station falls within the Kings Quarter redevelopment area and provides a strategic public transport link on a local and national level. The quality of the bus station is limited in terms of its appearance and functioning.

The form of the development creates an illegible link towards the City Centre and the internal spaces are not overlooked by surrounding development, leading to significant security issues. A clear link between the train station, bus station and City Centre is lacking at present. There are however, plans to provide a new bus station which will greatly improve the functioning and appearance of the area.

#### 3.4.8 Car parks

The various City Centre car parks form Gloucester's main non-public transport arrival points. The main public car parks are as follows.

1. Southgate Moorings
2. Blackfriars (Barbican)
3. Blackfriars (Ladybellegate Street)
4. Longsmith Street
5. Westgate Street
6. Hare Lane
7. Kingswalk Shopping Centre (off Station Road)
8. Eastgate Centre (off Brunswick Road)
9. Train Station
10. Bruton Way
11. Hampden Way car parks
12. St. Michael's Square

3.4.9 The quality and style of the car parks varies a great deal, with some being surface level areas and others being 1960's and 70's multi-storey structures. In general, the quality of the car park corresponds to its age, with most of the car parks being decades old.

#### 3.4.10 Bus stops

The main City Centre bus stops are located along Clarence Street and Lower Eastgate Street. Both of these streets have circulation issues with poor materials existing in many places. The central location of the bus stops does however, provide easy and direct access to the key City Centre attractions.

### 3.5 Land use and activity hotspots

3.5.1 Areas of concentrated retail, office and leisure uses generally create the most significant activity levels, in the most concentrated spaces. Residential areas tend to generate high activity levels, but only at peak times of the day and in a more dispersed pattern, over wider areas.

3.5.2 Due to this trend, central areas which contain high concentrations of retail uses, such as a number of the areas within the strategy boundary, are some of the most concentrated in terms of numbers of people who use those areas, both in terms of shopping activity and as employment sites.

3.5.3 People are also drawn to areas of historic interest, such as the Gate Streets, Cathedral and the Docks. There are also numerous other tourist sites, mainly centred on the historic Gate Streets, with the Gloucester Quays Outlet centre also being a draw for visitors and residents alike..

3.5.4 The following are the major land uses within the City Centre which have a direct impact on areas of public realm.

1. Eastgate Shopping Centre
2. Kingswalk Shopping Centre
3. Bus station & train station
4. GLI, Asda, Go Outdoors
5. Gloucestershire Royal Hospital
6. The Quays Shopping Centre
7. Wilkinson, Sainsbury's and Debenhams
8. Gloucester Rugby Club (Kingsholm)

3.5.5 The major land uses generate the varying activity levels which are experienced within the City Centre. Areas of more concentrated activity are linked to the major land uses. Improvement projects in, around and between the activity hotspot areas will therefore make the most difference to people's experience of the centre of Gloucester and have the most impact on raising the perceived quality of the City Centre.

3.5.6 The main City Centre activity hotspots have been identified and this is presented in the plan opposite.

# Land Use and Activity hotspots



## LAND USES

- 1 Eastgate
- 2 King's Walk
- 3 Railway Station
- 4 Bus Station
- 5 GLI
- 6 Asda
- 7 Go Outdoors
- 8 Gloucestershire Royal Hospital
- 9 The Quays
- 10 Debenhams, Sainsbury's and Wilkinson
- 11 Kingsholm RFC



## ACTIVITY HOTSPOTS

- 12 Railway to Bus Station
- 13 King's Square
- 14 Clarence Street
- 15 Boots Corner
- 16 Eastgate Street entrance to Eastgate Shopping Centre
- 17a&b Greyfriars Housing sites
- 18 Southgate Street entrance to Eastgate Shopping Centre
- 19 The Cross
- 20 Cathedral and Shire Hall
- 21 Area connecting Debenhams, Sainsbury's and Wilkinson
- 22 Bruton Way / Northgate Street junction
- 23 The Quays
- 24 The Docks
- 25 Kingsholm RFC

### 3.6 Connections

3.6.1 One of the main functions of the public realm within the centre of Gloucester is to provide routes between important destinations. Identifying and enhancing these connections between major land use and activity nodes is one of the key aspects of the strategy. The routes between activity areas not only provide access, but are also places in themselves, the quality of which is important in how the City Centre is perceived and used.

3.6.2 Before the details and approaches to the design of these connections is established, it is necessary to identify the character and quality of each connection. The following is a list of strategic connections through the centre of Gloucester:

#### **1) The Docks, via Kimbrose Triangle to the Southgate Street entrance of the Eastgate Shopping Centre and the Cross.**

This route was identified as 'linkages route 1' within the LDA Design document 'Gloucester – Public Realm Links' (July, 2008).

This was one of four routes set out as in need of improvement, with the aim being greater connections between The Quays development and the City Centre. The completion of the final section of this route to the Cross is a significant strategic goal.

#### **2) Train and bus station, via Kings Square to Gate Streets.**

This route is possibly the most significant within the centre, but is also dependent on the redevelopment of the train and bus stations, as well as the Kings Quarter area.

This route connects the most important historic areas of the centre, with the most significant redevelopment site and the largest activity generators. This should be considered the most strategically important connection within the centre.

#### **3) Train and bus station, via Clarence Street, to the Kings Walk and Eastgate shopping centres.**

This route connects the primary arrival points with the primary activity nodes within the centre.

#### **4) Lower Eastgate Street (GLI, Asda, Go Outdoors), via Eastgate Street shops, to Kingswalk and Eastgate shopping Centres.**

This route takes in major retail land uses at each end (including the GLI leisure centre), with a collection of smaller shopping units between. The quality of this link at present is poor and a public realm improvement scheme along this route would have a significant impact.

#### **5) The Docks, via Bearland and Westgate Street, to the Cathedral.**

This route connects Gloucester's two most significant historic tourist attractions. This route was identified as 'route 2' under the LDA design Public Realm Links document, and also has the significant aspect of having two of Gloucester's most important redevelopment sites along its length, in the former prison site and Blackfriars.

#### **6) The Via Sacra. This route, established in the 1960's, connects numerous historic tourist attractions within the City Centre.**

This is the most popular Civic Trust tourist trail and broadly follows parts of the Roman walls. Section 4.10 (Public Realm Strategy principles) explain this route in greater detail.

#### **7) Lower Westgate Street car park, via the cathedral to the Cross.**

This is one of the most significant historic connections and includes Westgate Street which holds the highest number of listed buildings of any street in Gloucester.



# Connections



- 1 The Quays to the Cross
- 2 Railway Station to the Cross
- 3 Railway Station via Clarence Street to King's Walk and Eastgate Street shops
- 4 Lower Eastgate Street to King's Walk and Eastgate Centre
- 5 The Docks to the Cathedral
- 6 The Docks via the Prison to the Cathedral
- 7 Via Sacra
- 8 Westgate Street car park to the Cathedral and the Cross

### 3.7 Existing hard landscaping materials

3.7.1 A wide range of materials exists within the City Centre, in varying states of repair. The Gloucester Quays Outlet and linkages project, including the public realm works around the Docks and Southgate Street, have all raised the quality of public areas within the City Centre. Simple palettes of robust paving materials, combined with modern and simple street furniture have set a high standard.

3.7.2 The Gate Streets public realm dates back to the early 90's and is around 25 years old. While the overall style of the public realm is dated, there are more pressing practical

issues which need addressing, such as paving materials needing replacement and the need to invest in high quality public realm to match or exceed that developed by competing edge of centre destinations, notably the Gloucester Quays Outlet.

3.7.3 There are a number of key central areas of public realm which should be highlighted, which form a useful comparison to the character and quality of the Gate Streets.

These are as follows.

- Gloucester Quays Outlet and Llanthony Road
- Orchard Square (proposed)
- Docks public realm
- Southgate Street Linkages

- Cathedral (Project Pilgrim) public realm improvements (proposed)

3.7.4 The map below shows the sequence of spaces which these major public realm projects create and the large area which has (or is proposed to be) enhanced. The area between the Docks and Cathedral (including the Gate Streets, Kings Quarter and Blackfriars) form an obvious and important next step in the regeneration of the City Centre, both in terms of connecting areas but also in terms of creating better places for people to live in and experience.

3.7.5 It should be noted that much of areas 2 and 3 shown within the 'Public Realm Projects' plan, are

## Public Realm Projects



privately owned, but are in general publicly accessible for much of the day. The same high quality treatment of these spaces in terms of materials and design are sought as for the other areas of 'public realm'.

3.7.6 There are various materials which have been installed and proposed, generally including natural materials, with granite (mixed colours), Forest of Dean sandstone and Yorkstone (slabs and pavers) being the primary hard surfacing materials. Resin bound gravel and coloured tarmac appear in specific areas to meet certain functions, such as highways

areas through the Southgate scheme. Street furniture incorporates a blend of grey metal, treated hardwood timber and stone.

3.7.7 A balance must be struck between the appearance of a palette of materials, their robustness and finally the overall cost.

3.7.8 The Gate Streets at present incorporate a combination of protected pavement areas of York Stone slabs to the sides of the streets, with smaller clay setts in a herringbone pattern around the middle areas (upper Westgate and

Eastgate Streets), or a higher quality stone sett pattern (upper Southgate and Northgate Streets) which are more robust and allow for vehicle movements. A strip of clay or stone setts in stretcher bonds are laid between the edges and middle sections.

3.7.9 One of the positive distinctive features are the outlines of previously existing buildings, laid in black engineering brick, which are set into the paving at various points along Westgate and Eastgate Streets.

### Gloucester Quays Outlet and Llanthony Road





Southgate Street / Commercial Road Linkages





Cathedral (Project Pilgrim) public realm improvements (under construction)



# 4. Public Realm Strategy principles

In order to be able to propose appropriate improvements to Gloucester's public spaces, it is first essential to analyse and understand the way in which the public realm in Gloucester is formed and used, what the character of the place is and what the positive and negative aspects of the existing public realm include.

The following section sets out the guiding principles for the design of the public realm within Gloucester City Centre.





A range of well finished drain covers



## 4.1 Main design principles

4.1.1 Public realm schemes within the City Centre must be designed to a high standard and should be guided by the following principles.

- Create a City Centre which is legible and clearly defined, based on the three distinct categories of spaces
- Low design speeds for vehicles should be established throughout the central area, to provide a safer and more pedestrian focussed environment. This is particularly important within the areas where vehicles, cyclists and pedestrians come into contact
- Streets and spaces should be designed to maximise the pedestrian domain, while also providing an environment that is pleasant to use for various activities, including walking, socialising, shopping or just sitting, and which continue to be safe and accessible at night
- Materials and street furniture used within public realm projects must be high quality and suitable for the character of the area in which they are placed
- The palette of materials must be elegant and visually appealing, and should enhance the character of each area. Materials should respect the fabric of the historic streets, reinforce local identity and will be selected from a limited palette to ensure design continuity
- Materials must be robust and able to withstand a variety of uses, from heavy goods vehicles to cyclists and pedestrians, depending on the character and function of each space
- Public realm schemes must be designed with low maintenance principles, including easy and straightforward periodic maintenance
- Proposals for landscaped areas and street furniture should form a coherent palette with a clearly defined overall theme
- Any street furniture proposed must function well, be robust and visually appealing, but also compliment other elements within the public realm.

- The siting and amount of street furniture will be designed with the aim of reducing visual clutter, while also providing sufficient furniture to accommodate people's needs and to allow the proper functioning of the public realm
- Designs should accommodate the needs of people with disabilities that may affect mobility, sensory or cognitive impairment
- The design of spaces should be flexible enough to accommodate various uses both now and in the future, including shifting land uses and activity areas
- The design of paved areas close to the built form should emphasise and identify special places and buildings within the public realm such as the entrance to feature buildings, sitting areas and terraces of restaurants / cafes

## 4.2 Gloucestershire Highways

4.2.1 Much of the public realm within the strategy's area falls within the responsibility of Gloucestershire County Council. The majority of the streets and spaces which are not classified as Public Open Space (POS) are classified as highways and must be able to provide suitable environments for the full range of vehicles, cyclists and pedestrians.

4.2.2 There is clear guidance set out for street design at various levels, including within Manual for Streets 1 (DfT March 2007) and Manual for Streets 2 (DfT September 2010), Manual for Gloucestershire Streets 4th Edition (April 2016) and Gloucestershire County Council Enhanced Materials Policy (October 2010).

4.2.3 The Categories of Spaces plan indicates types of public realm, split into three distinct types. Some of the areas of land indicated as 'public' are in fact privately owned, such as parts of the Gloucester Quays shopping area, the Cathedral Precincts, and the Docks. It is not intended that these privately owned areas are reclassified, rather that they are at present publicly accessible and contribute to the character of their areas and the

experience of residents and visitors. The Categories of Spaces plan should be used as guidance when considering new public realm projects, as well as during programmes of renewal and reinstatement.

4.2.4 It is critical to the success of any public realm project, including the strategy itself, that Gloucestershire County Council is involved in the process and supportive of the public realm strategy principles. The public realm within the strategy area must be designed and installed to a high standard, using high quality materials, which are robust and which provide for low maintenance over time.

4.2.5 It is critical that both the overall appearance of the public realm and the issues of robustness and maintenance are considered together during the design process.

## 4.3 Category of spaces

4.3.1 The analysis section of the strategy highlighted the way in which the historic development pattern through the Roman and Medieval periods still forms a significant part of the present City Centre. The existing land uses and activity patterns also contribute to an overall model for applying any future public realm schemes.

4.3.2 There are three general categories of spaces which stand out through the analysis of the City Centre and which will be used as the basis for public realm guidance.

- Lanes
- Primary streets and spaces
- Secondary streets and spaces

4.3.3 Each category has its own character and function and applying different treatments to each type of public realm will enhance each type's distinctive character and build a clear and legible series of spaces within the City Centre.



# Category of spaces



## 4.4 Lanes

4.4.1 The lanes category forms the finest grain of public realm within the City Centre. The majority of the lanes are well maintained and consist of good quality paving and detailing. This existing character and quality should be maintained and where necessary enhanced, following the existing style.

4.4.2 The following principles should be used to guide future public realm works projects within the lanes areas.

- A very simple materials range, limited to no more than two types
- Wall to wall paving with buildings up to the edge of paving
- Large format and smooth surface paving slabs
- Generally a central drainage channel
- Although largely traffic free, paving must be able to cope with occasional emergency vehicle use
- Keep surfaces free of clutter with very limited use of posts, lighting columns and bollards. Lighting should be fitted to buildings where possible
- Areas of surviving historic surfacing should be retained as part of any scheme
- Obstructions around narrow sections of lanes, in particular by entrances, should be moved to allow less restricted movement
- Retain existing mosaics at head of each lane.



## 4.5 Primary streets and spaces

4.5.1 The primary streets and spaces category is formed from the most important historic character areas within the City Centre, including the Quays and Docks, the Gate Streets and the Cathedral Precincts. These distinct areas contain some of the most important spaces in the city, which have a significant impact on the perception and identity of the city itself.

4.5.2 Part of the character and quality of the Quays and Docks area is indicated in section 3.7 'Existing hard landscaping materials'. A significant part of the Quays and Docks public realm has either already been uplifted, or detailed plans drawn up. Likewise, the area around the Cathedral is due to undergo significant improvements over the next 5 years, in line with the quality and range of materials set out in this section. As such, the focus for this strategy is the Gate Streets public realm.

4.5.3 A series of bollards generally forms the edge to a fairly narrow pavement line closest to each side of the streets, where York Stone paving slabs are used to distinguish these areas from the more common central areas. No kerbs are present within the upper areas of the Gate Streets, closest to the Cross, with bollards and street furniture forming boundary lines.

4.5.4 The newly completed public realm works along the southern end of Southgate Street and Commercial Road have set a high quality standard which should generally be continued into the remaining Gate Street areas.

4.5.5 This public realm uses a combination of high quality, locally sourced natural Forest of Dean sandstone, with buff coloured tarmac to the main carriageway (where it exists), with smaller natural stone setts used in sections, depending on use. Darker edging stone provides a contrasting band separating the carriageway and the pavement, with a flat surface across the majority of the public realm, except in small kerbed sections around the junction with Southgate Street, which relates to the bus stops.

4.5.6 The following principles should be used to guide future public realm projects within the Gate Streets, building on many of the standards established in the Southgate Street and Docks projects.

- A more varied range of landscaping and street furniture to respond to the character, use and activity of each area while still forming a simple and coherent palette of materials
- Reduce clutter by simplifying landscaping and street furniture
- The focus of movement within the Gate Streets and Primary streets and spaces, should be on pedestrians, with vehicles able to access the areas but restricted to specific times of day
- Reverse the existing movement proportions within the public realm by greatly widening the pavement areas nearest the building line and reducing the carriageways. This would immediately shift the focus of the Gate Streets towards pedestrians while also protecting the cellars of historic buildings which line the Gate Streets
- Remove all non-essential street markings
- Create a series of distinct 'places' at street intersections, so that lengths of continuous, unbroken carriageway are reduced
- Loading / parking bays to be defined by small setts, which are consistent with the treatment in the Southgate Street public realm
- Use street furniture, including benches, planters/trees, light columns and bins, as a way of defining and reinforcing the edge of the main pedestrian pavements, rather than long lines of bollards
- Set out paving in a staggered pattern, in the direction of most common movement, with straight joins across the narrowest dimensions of a space.
- Higher quality Forest of Dean stone within protected pavement areas to the sides of the street,

with pavers in Highway areas, with a strong edging stone between two main materials

- Granite setts or recon setts to Highways only for Upper Gate Streets, but tarmac acceptable beyond historic 'Gates'
- Much more flexibility in non-vehicle areas for higher quality paving
- Where tactile paving is required on either side of a controlled crossing over a Highway, simple metal studs should be specified, rather than single colour standard tactile slabs. Coloured metal studs can be used where greater colour contrast is required with the surrounding paving.

4.5.7 Consider the introduction of kerbs in carefully considered and limited locations, in combination with general widening of pedestrian-priority spaces.

- Kerb heights should be set to the minimum necessary to provide tactile guidance, whilst encouraging informal pedestrian crossing, such as a 40-60mm level
- Kerbs would help define street areas
- Allow some distinction of areas for visually impaired people
- Add some interest and variety to the street scene
- Provide a notional plinth upon which the various historic buildings would sit
- Provide some protection for pedestrians from vehicles
- Define a channel along which water could be drained
- Help to protect historic cellars to the fronts of properties.

Primary streets and spaces (proposed materials)

The images below show a range of suitable high quality materials which would be suitable for the primary streets and spaces category, including a mix of natural stone products and metal tactile paving studs.



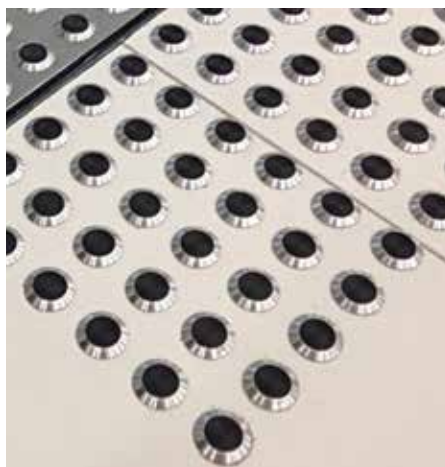
A range of colour tones and unit sizes of granite could be appropriate



Porphyry natural stone setts

Natural dark granite kerbs

Forest of Dean sandstone



Raised metal tactile studs at crossing points, set in natural stone

## 4.6 Secondary streets and spaces

4.6.1 The routes and spaces which surround the historic Gate Streets and lanes form the outer layer of public realm within the City Centre and have important strategic and functional roles. These peripheral routes provide the access into the core of the centre and serve all of the major arrival points, including the bus and train stations, as well as the City Centre car parks.

4.6.2 While the focus of these routes is the movement of the full range of transport types, the existing provision is heavily weighted towards vehicles of all sorts, in terms of the design of the roads and their appearance. One of the main principles of the Public Realm Strategy is to move away from standard vehicle focussed roads and towards streets which serve all types of transport types in a more balanced way.

4.6.3 The term 'streets' refers to something different from 'roads'. Roads are often interpreted or understood as routes that give precedence to motor vehicles over pedestrians and cyclists, and therefore prioritise movement over place.

4.6.4 Streets still allow movement, but they seek to provide more of a balance between pedestrian, cycle and motor vehicle movement. They also have a sense of place, in that they are locally distinctive, high quality, and they encourage social activity. This strategy promotes a move away from routes that act as roads and encourages routes that function as streets.

4.6.5 The edge of centre streets should act as a transition between the pedestrian-focussed Gate Streets and the more standard highway roads, which make up the majority of routes within the wider city.

4.6.6 Creating streets and public realm which respond to the local context is important to consider. Manual for Gloucestershire Streets (MfGS) states that, 'the NPPF and MfS place great emphasis on the benefits derived from good design and the effective context appraisal, relating a new development to the existing infrastructure. It is recommended that this process is conducted at the earliest possible

opportunity'. It is a requirement that all new public realm schemes which affect these edge of centre streets are designed taking into account the local context. The following principles should be followed.



Existing Secondary Street context



Secondary Street materials



Cairnhill pre-cast kerb, dark grey/black

- Downgrading of The Quay / Commercial Road / Southgate Street to 20 mph. This is an important strategic aspiration, as it will lead to safer streets and allow the public realm to function better for a wider range of people and transport types.
- Formal crossing points delineated with tactile paving should be positioned as close to junctions as possible, to allow pedestrians to follow desire lines along the street.
- Pedestrian crossing points across edge of centre streets are an important consideration in providing safe and easy movement. Ramped pedestrian crossings which use the same pavement material across the top, allow level access across street, which is particularly important for people with disabilities and for the movement of buggies and pushchairs.
- Tactile paving must be provided on both sides of every crossing point, to make partially sighted people aware that a crossing exists. Simple metal studs should be specified, rather than single colour standard tactile slabs. Coloured metal studs can be used where greater colour contrast is required with the surrounding paving, such as either side of a controlled crossing.
- Reducing road speeds for vehicles is important to improve pedestrian and cyclist safety and to create appealing environments. This can be achieved by providing tight turning radii at junctions, providing rumble strips at crossing points and entrances to different street types (particularly into the Gate Streets) and reducing junction widths.
- An overall reduction in the width of highway space and an increase in pavement widths would help to re-balance the focus of the secondary streets away from vehicles and more towards pedestrians and cyclists. Streets which function well for all modes of transport should be the key objective.

## Secondary streets and spaces

The images below show a range of suitable high quality materials which would be suitable for the secondary streets and spaces category, including a mix of natural stone products, conservation style natural aggregate, as well as simple tarmac for Highways areas.



Drivesett Tegula block paving, Pennant Grey



Tarmac, dark grey



Conservation smooth flag pavers



Forest of Dean sandstone

## 4.7 Summary of proposed materials

4.7.1 The following graphical matrix shows a summary of the proposed materials for the different categories of spaces. These materials are presented as a guide, with a range of specific materials available.

Lanes	Primary streets and spaces	Secondary streets and spaces	
N/A	 <p>Granite pavers - mixed greys</p>	 <p>Tarmac - dark grey</p>	Highways
N/A	 <p>Porphyry natural stone setts</p>	 <p>Drivesett Tegula block paving - Pennant Grey</p>	Unloading bays
 <p>Large natural stone slabs</p>	 <p>Granite pavers - light grey</p>	 <p>Conservation Smooth Flag pavers</p>	Channels
N/A	 <p>Granite blocks - dark grey/black</p>	 <p>Cairnhill pre-cast - dark grey/black</p>	Kerbs
 <p>Natural stone rectangular setts</p>	 <p>Forest of Dean sandstone</p>	 <p>Forest of Dean sandstone</p>	Pavements
N/A	 <p>Forest of Dean sandstone</p>	N/A	Crossings

## 4.8 Precedent projects

4.8.1 The recently established public realm schemes within the Quays, Docks and Southgate Street offer high quality local precedents which should be used to guide future public realm schemes within the City Centre. Other suggested references are set out in this section.



Clapham Old Town, visualisation of final scheme.

Project design by Urban Movement [http://www.urbanmovement.co.uk/clapham-ot\\_projects\\_urd.html](http://www.urbanmovement.co.uk/clapham-ot_projects_urd.html)

Winner of the NLA 'Public Space' Awards 2015, the London Planning Awards 'Best New Public Space' 2015, the London Transport Awards 2015 'Excellence in Cycling & Walking', and 'Highly Commended' for the RTPI Awards 2015 in the 'Planning for the Public Realm' category

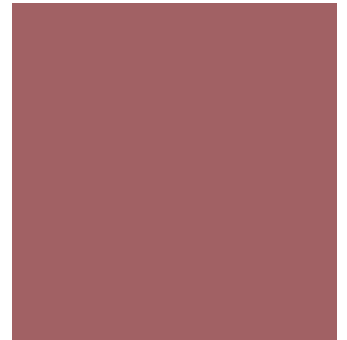


Place d'Youville, Quebec, Canada  
by Claude Cormier + Associates  
<http://www.claudecormier.com/en/projet/place-dyouville>



Paving, Copenhagen





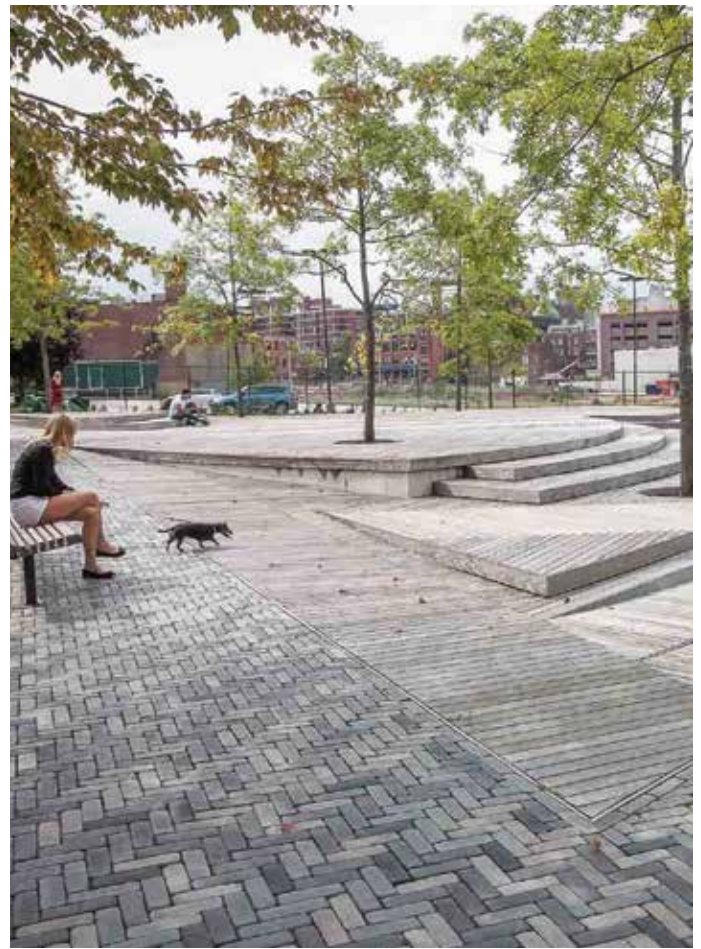
The Waterfront Promenade, Aker Brygge, Oslo (Norway) by Link Landskap

Below: Public Realm project at Stationsstraat, Sint-Niklaas, Belgium





Ribe Cathedral Square, Denmark



The Jewelry District, Providence (USA)

Below: Federation Square, Melbourne



Contrasting paving textures

## 4.9 Design affecting visually impaired, disabled and elderly groups

4.9.1 The public realm of Gloucester should cater for the needs of a broad cross-section of the population. The needs of visually impaired, disabled and elderly people should be taken into account when designing new areas of public realm, or when adapting existing areas.

4.9.2 The following principles should be followed.

- Maximising the area for pedestrians will benefit visually impaired and disabled
- Using clearly set out and unbroken boundary lines will help ease of movement
- Introducing an unobstructed raised kerb within the Gate Streets will improve the legibility of the public realm for partially sighted or blind pedestrians
- Using flat and smooth paving types will allow good movement to those in wheelchairs

- Rough or uneven surfaces can be difficult for wheelchair users and people with prams and pushchairs to cross, and they can create trip hazards or be confusing for blind or partially sighted people. A greater focus on maintaining and repairing damaged hard landscaping will provide safer and less obstructed routes
- Strong contrasts can make it easier for partially sighted people and colour blind people to find their way. Clear and consistent colour schemes within the landscaping and street furniture, can make it easier for everyone to understand streets and spaces
- Highway and planning authorities must comply with the Disability Equality Duty under the Disability Discrimination Act 2005. This means that in their decisions and actions, authorities are required to encourage participation by disabled persons in public life
- Consultation should be carried out with interest groups particularly at the detailed design

stage to ensure designs meet the needs of the community

- The introduction of new street furniture should ensure that the design meets the needs of all users and is sited to ensure unimpeded routes
- Seating should be well designed and located and be provided at regular intervals
- Public lighting should be at an adequate level to help create safe routes and space for all.
- For planned new public realm schemes, a disability user audit should be undertaken to identify where improvements can be made to a scheme. This should be carried out during the design stages and not once a design has been finalised, to allow for proper integration of suitable features.



## 4.10 The Via Sacra

4.10.1 The Via Sacra is a circular walk around the centre of Gloucester which broadly follows the line of the Roman city walls. It's route passes numerous historic landmarks and is identified by black or contrasting alternating paving. It was established in the 1960's and is now the most popular Civic Trust walking tour within the city.

4.10.2 The existing Via Sacra route crosses all of the Gate Streets at various points and is made up of varying types of paving, in a range of states of repair. Both the concept and physical marking of the route are well supported and the route forms a useful walking route which broadly reflects the historic Roman wall line.

4.10.3 However, the Via Sacra route does miss many notable historic

structures and spaces, including The Cross and the numerous historic buildings along Westgate Street.

4.10.4 The following recommendations were formed in response to the lack of a single, coherent paving style and the varying states of repair along the route (including the absence of markings in various places). Research based on precedents from other cities was also considered.

- Where possible, retain the existing cruciform pattern where materials are in good order. Examples include the route through the Kingswalk Shopping Centre and along Greyfriars Lane
- Renew existing poor quality areas of Via Sacra paving and add metallic markers set into the paving, which indicate the route. This has been used to good effect

in Norwich, and would allow the Via Sacra route to essentially overlap the existing streets without the need for wholesale repaving of entire routes, while also being fairly unobtrusive and not contributing to street clutter. A marker could be positioned at every turn in the route

- The design of the markers could be inspired by a locally distinctive feature or concept, with each plate being individually artist designed, or a series of duplicated designs
- Query the inclusion of parts of the Via Sacra route, including Kings Square and Eastgate, and consider including The cross and more of Westgate Street.



# 5. Street furniture

The most noticeable and functional elements of the public realm are often the street furniture, which involve a wide range of items, including benches, litter bins, bike racks, light columns and signage. The following section sets out design principles and proposals for each main type of street furniture, based on the analysis carried out within Gloucester and of precedent schemes from across the UK and Europe.



## 5.1 Design principles

There are a number of important principles which any type of street furniture should follow.

- The design of the street furniture should be coordinated using a limited palette of traditional materials such as stone, wood and metal. The design should have a timeless quality that is capable of accommodating future additions or changes
- Any street furniture must be robust with very low maintenance requirements, including being resistant to vandalism. Any items must be able to be treated to preserve their structure or prolong their lifetime
- Where timber is used within street furniture, a hardwood must be specified to provide a more robust and longer-lasting finish, possibly including a preservative treatment
- Street furniture must be visually appealing and enhance the character and quality of the area.
- Furniture should function well and be fit for purpose
- Surviving historic street furniture should be retained and refurbished where necessary, particularly the pin and needle bollards found within the Gate Streets
- Consideration should be given to grouping and locating furniture so that it responds to the uses and activity within the surrounding area. This would include placing fewer items of furniture in particularly busy areas, or leaving space to the fronts of cafes and restaurants to allow for outside seating areas
- A coordinated colour palette should be agreed, which helps to develop a unique local theme for street furniture within the City Centre. This colour palette should complement the choice of materials used in hard landscaped areas.

- In order to reduce clutter, consideration should be given to linking items of furniture. This could involve integrating separate sign columns onto a new lighting column, or using benches, bins and light columns in place of long rows of bollards. Consolidating furniture would also lead to a clearer and simpler public realm which would enable fewer high quality items to be provided
- Although it is advisable to reduce unnecessary street clutter, consideration must be given to not reducing the essential public realm items which support the functioning of the City Centre,
- Where rows of bollards are unavoidable to protect areas of high quality paving or existing cellars of older properties, consideration should be given to reducing the number of bollards and increasing the spacing between bollards.

## 5.2 Litter bins

5.2.1 Bins are one of the most important functional items within any City Centre public realm scheme. There are a number of essential requirements which any proposed bin within the Gloucester City Centre must meet.

- Seagull proof (it has a covered top with two clear openings)
- Cigarette provision including stubber and accessible ash collector; which doesn't detract from the visual quality
- A type which can be adapted for recycling
- A contemporary form and appearance must be of a high quality
- The physical structure must be very robust, using full metal construction, including the internal liner; with a minimum 5-year guarantee
- The bin must be able to be fitted into a variety of base materials, including stone and brick, with an adjustable base being preferable
- A capacity for main bins not below 110L to provide for adequate general use
- Must have wide enough opening to accept a wide range of items.

5.2.2 Following extensive research into bin types, the OMOS s16.2 bin has emerged as one of the leading contenders, which meets all of the criteria, with a 10 year guarantee, robust construction and positive appearance. This bin type should be considered for inclusion within the Gate Streets. This bin has also recently been installed within the Royal Parks of Cambridge.



Examples of OMOS s16.2 bins

5.2.3. In addition to meeting the primary criteria for litter bins, the OMOS s16.2 has the following features.

- A recycling adaptation to the openings means the same bin type can be used for both recycling and general waste, which will allow better integration into street scene
- The form and appearance has a quality which means it is aesthetic but doesn't overly stand out, with a flowing curved form
- The construction is very robust with a 10-year guarantee, which is the only bin on the market to provide this level of cover. The bin is full metal construction using 10mm galvanised truck steel and aluminium top
- Fully adjustable base and fixings with robust base material allows placement in any position
- Full range of RAL colours available
- A Large capacity of 120L, which is 10L more than the standard capacity, meaning fewer bins are needed overall.

### 5.3 Bollards

5.3.1 There are a number of areas within the City Centre where bollards are required, however bollards also contribute to street clutter and there are often other means of achieving the same functions.

- Use of bollards should be limited to areas where potential impacts on pedestrian safety exist or where vehicular impacts could damage buildings or street trees
- The use of raised kerbs, or the placement of other essential items of street furniture, should be considered as an alternative to the introduction of bollards in most cases
- Bollard design should complement other items of street furniture
- Consideration should be given to the robustness of the bollard

types used, as well as the longer-term maintenance issues. A simple stainless steel bollard can present fewer maintenance issues over time and would complement a simple palette of materials, including stone, timber and stainless steel

- A selection of the Gate Streets pin and needle bollards should be retained but where appropriate, should be reduced in number to avoid street clutter.

### 5.4 Bike racks and hoops

5.4.1 In order to encourage non-vehicular forms of transport, it is essential to also provide the necessary secure storage and parking facilities for bicycles within the City Centre.

5.4.2 Bike racks must be located in easily accessible locations which are close to the main centre uses, such as shops and restaurants. At present, bike racks are located at the pedestrianized entrances to each of the Gate Streets, which is in line with the policy of only allowing cycle access through the Gate Streets between the hours of 10am and 5pm. This restriction is in place to reduce the conflicts between cyclists and pedestrians, in often crowded areas.

5.4.3 It is recommended that these general areas allocated for bike racks are retained as the main cycle parking areas for the Gate Streets. Additional bike racks should be installed adjacent to other major activity generators within the secondary streets and spaces, such as within Kings Square.

5.4.5 Stainless steel racks would not suffer from damage to paintwork and are a robust and cost-effective solution. An alternative plain metal style could also be suitable in a different finish but any material chosen must be highly robust due to the consistent impacts from daily use.

5.4.6 Covered bike racks should also be considered in high activity areas where demand for bike parking is high. This would improve the chances that people would use these facilities and potentially lead to improved use.

### Summary

- Well placed, accessible and secure bike parking facilities are essential to provide, which are close to the main City Centre facilities
- Bike racks located at the pedestrianised entrances to the Gate Streets should be retained, with additional racks considered around entrances to key activity generators
- The re-painting of existing bike racks should be considered as a short-term improvement
- Introduce stainless steel bike racks as a low maintenance and robust material
- Introduce covered bike racks in areas of high activity, to encourage use.



Sheffield hoops



Edge bike shelter



Cyclehoop Ltd Public Bike Pump

## 5.5 Benches and seating

5.5.1 Benches are one of the essential items of street furniture that any area of public realm within the City Centre should provide.

5.5.2 Good provision of benches in strategic places will enhance people's experience of the City Centre and allow people to extend the time they spend there.

5.5.3 Where appropriate the design and layout of seats and benches should define and enclose spaces as well as provide seating. Simply providing rows of benches is not the best use of space and more imaginative options could encourage better use and enhance people's experiences.

5.5.4 The provision of benches within and adjacent to high activity areas must be promoted.

5.5.5 Seating can easily be incorporated into other forms of street furniture in order to simplify the number of items and reduce street clutter. Seating set within planters or surrounding street trees, can be an effective approach.

5.5.6 Seating should generally be positioned towards the edges of a street and face towards the centre of

the street. This allows the best views of activity within the street. Another option is to place seating backing onto each other and facing up and down the street, thereby providing longer views. This also provides the opportunity for clusters of feature seating which define specific areas.

5.5.7 Multi-facing benches should also be considered if a more central position is chosen, to allow choices of facing positions for people and to maximise the views on offer.

5.5.8 In order to make seating areas easier to use and more comfortable, particularly considering elderly and disabled people, seating should generally incorporate backs and arm rests.

5.5.9 Seating can provide a good opportunity to provide forms of feature lighting, particularly under block style seating. This can create interesting and more defined areas of lighting and enhance the general appearance of a street scene after dark. Maintenance and robustness issues should be considered and the need to properly maintain lighting over time.

5.5.10 Materials for benches should be robust and able to withstand daily use. Metal will generally be the most appropriate material (either painted or stainless steel), with stone

providing a more solid alternative. Timber should be considered within a small palette of materials and is recommended to break up the hard stone and metals and to provide a more comfortable surface. If timber is used, only a European hardwood which is FSC Certified should be specified.

### Summary

- Seating should be positioned close to activity generators, such as shops, areas of open space, cafes and restaurants.
- Arranging benches to enclose spaces, or in positions other than in simple lines (such as backing onto each other), can create more options for people
- Main areas of seating should generally be positioned towards the edges of a street or space, to allow longer views across the public realm.
- Multi-directional seating should be considered if seating is positioned more towards the centre of a space, for example surrounding a feature tree
- Robust materials must be specified for benches.



Alcorque I corten bench - Lab23



Clifton hardwood bench - Woodscape



Woodscape Westbrook Circular



Docks stone block seating



## 5.6 Planters and street trees

5.6.1 Street trees and planting are always popular and valued aspects of the public realm. Trees can help to soften sometimes overly hard landscapes and provide an organic contrast within urban areas. Trees also provide shelter from the elements and shade on sunny days, while also helping to limit and control atmospheric pollution.

5.6.2 At present, street trees exist at limited locations within all of the Gate Streets, often in the areas within the line of the Roman walls. Their use does compliment the very defined public realm, where the majority of buildings are located hard against the street.

5.6.3 The existing street trees should be preserved and where necessary, maintained to limit their overall size. The introduction of additional street trees should be carefully considered.

5.6.4 The following principles should be considered and followed when developing designs for new public realm projects.

- The guiding principle is to provide the right tree in the right place. Inappropriate tree planting can have a negative impact in many ways

- Consider the ultimate size and shape of the tree. Will the tree frame, enhance, detract or screen a view, building, or setting? Views towards landmarks or listed buildings should be preserved
- Develop a clear rationale for why the tree is being planted
- Consider the ground and site conditions. Trees will need to cope with, and be protected from, a range of factors within the urban environment, including poor soils, pollution, drought, extremes of temperature, and underground services
- Tree characteristics, including leaf texture, size, shape, autumn colour, bark colour, flowers and fruit should be considered. Are these characteristics appropriate to the setting?
- The vast majority of tree roots grow in the top 1 to 1.5m of soils. Roots can exert direct pressure upon hard-surfacing in close proximity to the base of the tree as they grow. Tree pits can be used within hard landscapes to limit or control root growth.
- Enhanced green infrastructure should be considered, including increased tree planting, green

roofs, insect-friendly areas of planting and bird & bat box provision!

5.6.5 In general, trees should be planted in the ground rather than in planters as this will help to prolong the life of the tree and aid the growing stages. Far less on-going maintenance is required for ground-planted trees, including watering during the summer months.

5.6.6 There will be occasions when it is not possible for planting to be placed in the ground, possibly due to archaeology or services, or when a less permanent solution is desired. In this case, the following criteria should be applied to the design and construction of tree planters.

- The style of planter should be urban and modern, drawing on the references from the palette of materials established for other street furniture items
- The construction of planters should generally be limited to robust materials, including concrete, stone and metal. Timber should be avoided as a priority due to its less robust finish and on-going maintenance issues



Timber and metal bench, Kimbrose Triangle



Streetlife Rough&Ready Topseats bench



Camber bench by Forms+Surfaces



Timber bench, The Lyng - West Bromwich

- The use of planters could be considered in place of bollards or benches and would perform the multi-function of protecting sensitive areas, providing planting and seating
- A public art theme could be incorporated into the planter design and help to form a consistent theme which would run through the various street furniture elements and landscaping.



Aalborg City Centre tree grille



Corten tree grille and timber bench

5.6.7 Tree grilles and other furniture associated with tree planting should be carefully considered as part of the overall public realm design. These elements offer opportunities for public art or decoration, which can help to improve the interest and appearance of public spaces and streets.

5.6.8 A consistent theme should be developed based on the category of spaces set out in Section 4.3. A bespoke set of grilles could be designed to link into the branding of each specific Gate Street, which could help to distinguish each area and enhance the local character and identity of those streets.



Streetlife conical tree tubs



Tripla tree grille

5.6.9 In general, guidelines set out in the Trees and Design Action Group document, titled 'Trees in Hard Landscapes – A Guide for Delivery', should be followed when developing planting schemes.



Streetlife Corten Shrubtubs



Streetlife Love Tub

## 5.7 Signage and road markings

5.7.1 While some street signage forms an essential part of a properly functioning City Centre, the over provision of signs can lead to confusion and clutter. Signs must only be provided if absolutely necessary.

5.7.2 Multiple signs should be placed on the same post where possible to limit the number of individual posts.

5.7.3 When designing new areas of public realm, guidance set out in Manual for Streets should be considered. A starting point of zero signage should be introduced and only introduce signage if necessary.

5.7.4 Statutory signs must give users a clear message. Limiting the number of these signs is encouraged, as this will have more impact. Providing a uniform shape and colour for the signs will aid the recognition process.

5.7.5 In general, road markings of all types should be avoided, unless absolutely necessary. For example, double yellow lines are unsightly and detract from the character of an area. Small 'no parking' signs can be used instead and fixed to existing items of street furniture to limit and control street clutter. Metal studs or a contrasting material should be used for parking bays instead of painted line markings.

5.7.6 Adshel advertising signs can have a negative impact on the functioning and appearance of the public realm. In general, these forms of signage should be removed. Where they are deemed to be absolutely necessary (or where existing contracts limit removal options), they must be positioned perpendicular to the pavement not at right angles as this blocks pedestrian flows and restricts views and desire lines.

5.7.7 The modern wayfinding map panels installed as part of the linkages project are simple and easy to understand, but display a fairly limited range of information. The quality of the finish is also very poor.

5.7.8 An updated style of map panel should be developed for the City Centre which sets out clear and legible information, which integrates the Quays linkages information and which

provides an indication of walking times through the area. The Bristol Legible City project could be used as the basis for a new system in Gloucester.

5.7.9 Principles for new map panels should include;

- Clear and easy to read and understand
- Strong structurally and hard wearing
- Must show all of the major tourist attractions and places of interest
- Must not block desire lines or visibility lines
- Must visually and stylistically relate to the Linkages map panels, to promote continuity between areas
- Should be elegant in appearance and not visually dominate the appearance of the streetscene.

5.7.10 The fingers element of the wayfinding signs are an important feature and clearly direct visitors to key City Centre locations. This fingers element of the existing signage should be replicated in a similar way in any new form of City Centre wayfinding signage.

5.7.11 The use of A-boards is controlled by separate guidance produced by the Licensing team within the City Council.

5.7.12 Digital signage is another method of displaying a range of content, including advertising, wayfinding and targeted local events information. Content is able to be regularly updated to reflect specific local needs, for example to alert people to festival information or when an event is being held at a local venue.

5.7.13 Due to limitations with existing display technology and the need to provide very robust outer shells, the overall depths of external digital signage units remain high. The bulkiness of these digital units, whether single or double-sided displays, must be carefully considered when assessing their impact on the character of an area, particularly within areas of significant historic interest.

5.7.14 The colour of signage in general will have an impact on how much they stand out within the streetscene. Darker colours, tend to stand out more and in general, should be avoided. Items of street furniture which have a heavy appearance and which dominate the appearance of the streetscene, should be avoided and lighter alternatives considered.



Wayfinding signage in Mulhouse, France



Birmingham City Centre digital signage

The following images show examples of potentially suitable signage.



Rivermeade Linkages wayfinding signs



Wayfinding signs, Millennium Square, Sheffield



Bath wayfinding signage by Pearson Lloyd Reddacliff Place, Brisbane, Australia



## 5.8 Lighting

5.8.1 Public realm lighting is an important element of the overall functioning of the City Centre and has a significant impact on the actual and perceived safety of people. Good lighting allows the use of the public realm to be extended beyond daylight hours, particularly during the winter months.

5.8.2 The existing lighting within the City Centre is predominantly based on standard Highway lighting design principles, where high lamps are mounted on columns. The public realm lighting within the Gate Streets is based on building-mounted, high-level floodlights, set at regular intervals.

5.8.3 It is recommended that lighting within the edge of centre streets follows the standard highway approach, given that this is functional and this lighting is generally in areas outside of the historic core.

5.8.4 The Gate Streets and Lanes provide a different type of public realm, generally being pedestrianised at most times, with a focus on the quality of the spaces and buildings. People experience these areas at a lower speed and it is important to provide the best experience possible.

5.8.5 The existing lighting within the Gate Streets in particular provides a very functional and even effect, which supports CCTV operations. The Gloucester Lighting Strategy (2008) sets out numerous lighting projects and design principles, with one of the suggested projects being to re-light areas of the City Centre. Part of that approach would be to move from the high-level building mounted floodlights, to column based lighting.

5.8.6 A more efficient and focussed approach is proposed, whereby only key junctions are re-lit. The Kimbrose Triangle area has already been provided with lighting based on a limited number of multi-head light columns. This approach could be applied to The Cross, which would eliminate four building-mounted floodlights on historic buildings and create the opportunity to provide remote architectural lighting. The final area could be by the Cathedral, at the junction of Westgate and College Streets.

- Multi-head systems offer the opportunity to provide not just ground lighting, but feature lighting of specific items within the public realm, such as seating areas or ground paving artworks
- The existing building-mounted floodlights could be removed, leading to less intrusion onto historic or listed buildings within the conservation area
- Architectural lighting would become very easy with one lamp directed at a building of interest, without the need to fix costly and intrusive equipment to the buildings themselves. This would avoid the need for contracts with building owners and for Listed Building Consent in most cases
- Maintenance and repairs would be straightforward and limited to specific columns which are easily accessible from the public highway. Each component is easily ordered when necessary and come in energy saving LED options
- Power would be taken from the County's supply rather than multiple individual property owner's supplies, resulting in a far more efficient system
- CCTV can be incorporated into lighting columns to remove additional items of clutter

5.8.9 Lighting within benches is a further option available, which can have the benefit of producing more subtle lighting within specific areas, as well as creating or enhancing artworks or features within the streets.

5.8.10 In any situation where lighting is provided, robustness of equipment and a long lifespan is essential to reduce on-going maintenance costs and to preserve the intended effects.

## Public realm lighting

The following images show examples of high quality public realm lighting, which focus on multi-head, column-based types.



Charlie Davidson, Sunnyside Gardens Sunderland, UK



Budapest street lights



Pere Cabrera multi-head light column, Barcelona



Gloucester Docks public realm light columns



Woodhouse Olivio light

## 5.9 Public art

5.9.1 Any area of public realm can potentially be enhanced and made more interesting through the installation of public art features. Public art is particularly good in areas where a focus is needed or where large groups of people congregate. The following can be achieved through public art.

- Create a sense of place and local distinctiveness
- Enhance the architectural and historic heritage of a place
- Develop new relationships within the community
- Inspire a creative and imaginative approach
- Improves the quality and interest within the public realm
- Helps to express local identity and cultural diversity
- Brings social and economic benefits.

5.9.2 Public art can take many forms, including paving features, street furniture, planting, enhanced materials or building-mounted forms, including the design of cladding or sculptures.

5.9.3 In general, public art which has a connection to the local people or area is best and in addition to trained artists, this can involve community groups, college students and members of the public in the design process. For example, the stone wave bench sculpture at the cross by Peter Yarwood illustrates the Severn Boar which periodically runs up the River Severn.

5.9.4 The 2006 document 'A Place for Art – A Public Art Strategy for Central Gloucester' (by Ginkgo Projects Ltd), should be used to guide the provision of public art within the Public Realm Strategy area. This strategy document highlighted the historic city gates as potential areas for public artworks and sets out management strategies for the existing artworks.

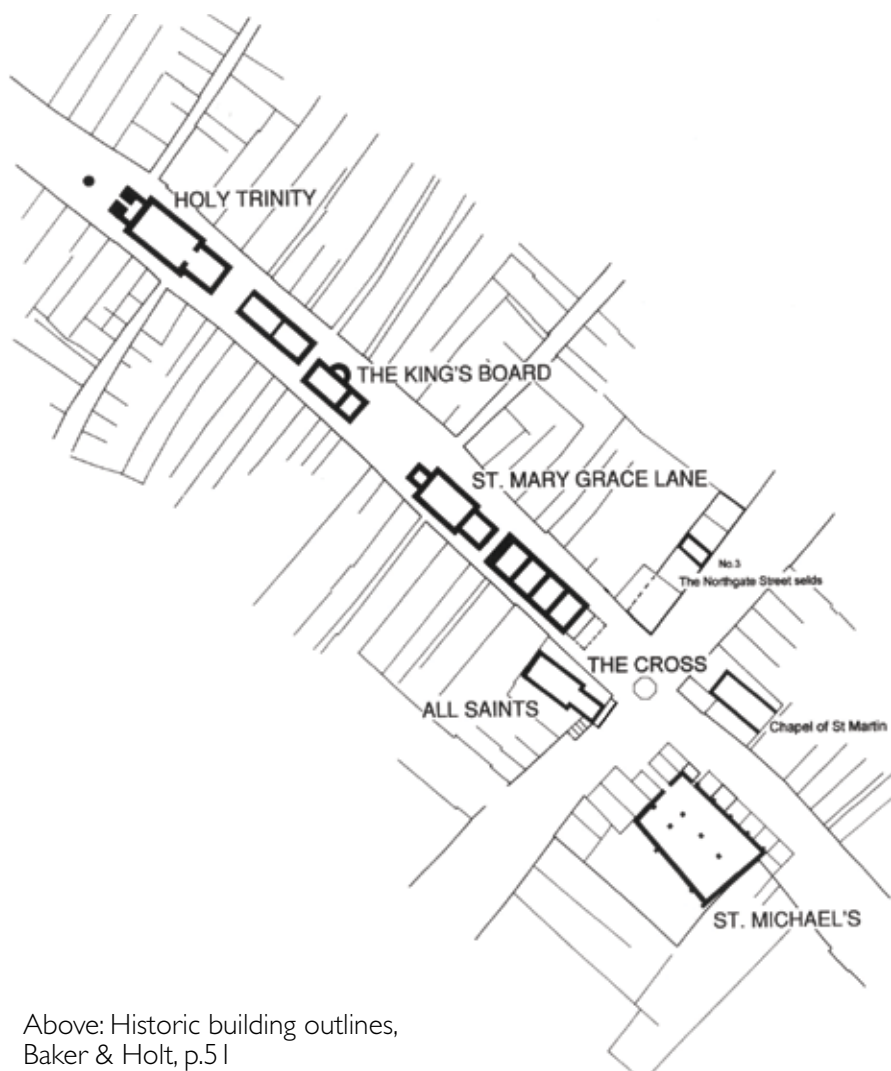
5.9.5 One of the more interesting but often overlooked public artworks

within the Gate Streets is the series of building outlines along Westgate and Eastgate Streets. These outlines, formed in black engineering brick, show the locations of historic buildings which stood within these streets, which is a real link to the history of the place.

- It is recommended that these features are retained within any new public realm works project
- The existing form of the outlines needs reviewing to help the feature stand out more
- Coloured metal strips could be used for the outlines, against a lighter paving background to increase the contrast between colours and materials
- Alternating colours, from bright yellow, through orange and red down the street, could draw further attention to these features
- The use of textured materials could be appropriate.

5.9.6 A series of recently reconstructed mosaics are set into the ground at the head of each lane off Westgate Street and older mosaics along Northgate and Southgate Streets. These broadly illustrate the types of historic activities which were carried out within each of the specific lanes or buildings. Each of the new mosaics is set within a metal tray which should allow them to be temporarily removed during any public realm works. These mosaics should be retained within any new public realm project.

5.9.7 Some form of artistic branding of the Gate Streets using artist designed decorative signs could be an interesting way of signifying each streets' identity and character, possibly linking into an individual theme for each.



Above: Historic building outlines, Baker & Holt, p.51

Precedent images of different forms of public realm art



Berlin Wall paving marker



Paving and Corten marker, Arminza, Spain



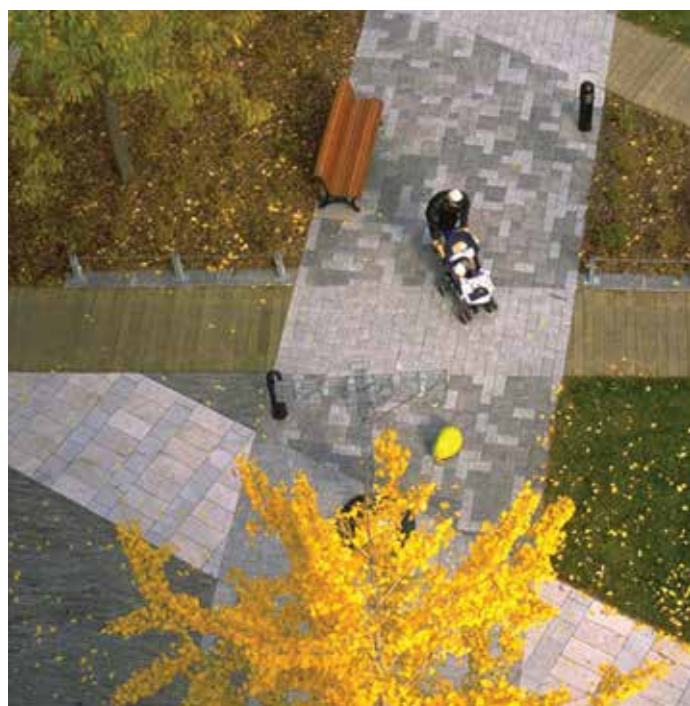
A 22 metre high Corten steel candle in the Docks, by artist Wolfgang Buttress



Paving directional tile



Lighting of the 16m tall Kyneburgh Tower artwork at Kimbrose Square, Gloucester; by artist Tom Price



Landscaping and paving detail, Place d'Youville, Quebec, Canada by Claude Cormier + Associes





Category	Comments	Response
<p><b>General</b></p>	<p>Well received; stimulating, encouraging, well researched and suggests excellent improvements. Positive emphasis on ‘streets’ not roads. A very informative, detailed and well considered document.</p> <p>It all sounds good. I think Gloucester should celebrate its ancient origins far more and encourage people to be aware of what is underneath their feet. I would like to see the city beautified a lot more.</p> <p>The document should be formally adopted as an SPD to enable this to be used in a robust manner in relation to forthcoming regeneration schemes. A policy relating to this in the City Plan is also required to assist with s106 contributions for public realm improvements.</p> <p>Analysis (p12-). Might be useful to have some (good/bad) conclusions to inform subsequent chapters.</p> <p>There seems to be no reference to the importance of specification, attention to detail in execution, and maintenance. This all relates to Implementation and Management. Is there to be a sister document on this, which might cover local protocols for the highways dept and statutory undertakers? If so, should it be trailed?</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Gloucester City Centre has many problems but has many opportunities. This document doesn't easily identify these. A lot needs to be done to Gloucester to make the City Centre attractive. I hope this is a step towards that but I was disappointed with this</p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p> <p><b>Noted. Adopting the document as an SPD is one of the possible outcomes of the process and would add planning weight to the principles contained within the document.</b></p> <p><b>Noted.</b></p> <p><b>Noted. The focus of the Public Realm Strategy (PRS) is on principles and does not cover more detailed issues.</b></p> <p><b>Noted. This will be considered during the review process prior to the final PRS revision.</b></p> <p><b>Noted.</b></p>

	<p>document. Flashy pictures and lots of small text doesn't make a document good.</p>	
<p><b>Strategy: Principles</b></p>	<p>Public spaces often have multiple uses at various times through the day and night, the outside of licensed premises which are used at night should be safeguarded from developments that affect the daytime usage.</p> <p>We are surprised to note that the public realm strategy makes no mention of boundary treatment particularly as this continues to be a hot topic around the Docks. We suggest that an additional section setting out criteria for boundary treatments, including railings, bollards and fencing would help to give clarity and help prevent a plethora of styles and materials, particularly within the Dock area.</p> <p>This SPD could recognise the Public realms potential to also act as Green Infrastructure (GI) and consider how it's main design principles might link to the Joint Core Strategy's own GI strategy.</p> <p>Guidance for the docks area should include retaining the ability to serve the area by water, especially we would wish to see protection for the following: ability to undertake one-off heavy lifts, ability to receive 'final mile' deliveries, ability for commercial passenger vessels to allow passenger to embark and disembark in the docks.</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential</p>	<p><b>Noted.</b></p> <p><b>Noted. The focus of the PRS is on principles and does not cover more detailed issues.</b></p> <p><b>Noted. The PRS does include information relating to trees but a further paragraph detailing the more strategic advantages of providing enhanced GI will be included within Section 5.6, along with selected examples, such as additional street trees, green roofs, insect-friendly areas of planting and bird &amp; bat box provision.</b></p> <p><b>Noted. The design principles within the PRS do not cover more detailed or use-specific issues but these issues can be raised during the consultation stages of planning applications adjacent to the canal.</b></p> <p><b>Noted. The PRS does include information relating to trees but a further paragraph detailing the more strategic advantages of providing enhanced GI will be included, along with selected examples, such as additional</b></p>

	<p>Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>The document should make some reference to Paragraph 58 of NPPF which explains the need to “ Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.” Additionally Gloucester City Council’s 2016 publication ‘ Designing Safer Places should be mentioned or referenced.</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape, through sensitive siting and good design, and avoid unacceptable impacts.</p>	<p><b>street trees, green roofs, insect-friendly areas of planting and bird &amp; bat box provision.</b></p> <p><b>Agreed. Additional text will be added within section 2.1 National policy &amp; guidance, which details these points.</b></p> <p><b>Agreed. Local distinctiveness is a key theme within the principles section, primarily relating to the use of materials and the basis upon which the categories of spaces plan was developed.</b></p>
<p><b>Strategy: Category of Spaces</b></p>	<p>We agree in principal with the category of spaces, however, the use of the terms Primary and Secondary for areas , where these are already used in road classification, but with widely opposing meanings, is likely to lead to confusion for developers.</p> <p>The primary “red” route between the city centre and the Docks/Quays should be continuous, rather than having the secondary “orange” route overlaying it and therefore appearing to take precedence.</p>	<p><b>Noted. While the wording used is the same as road classifications as noted, it is unlikely that the two distinct areas of design would be confused, particularly given there are already very precise Highway requirements set out in various documents. Any area of Highway would primarily be covered by Highway legislation with the PRS acting as an additional guide to enhance overall quality in specific areas.</b></p> <p><b>Noted. The area in question includes Kimbrose Way which is treated with coloured tarmac, which relates to the Secondary range of materials, set out on page 33. The Primary</b></p>

	<p>The principle objection of our client to the document as drafted is that the text and plans (pages 5 and 13 for example) within the DGPRS identify vast swathes of <b>private</b> land within the city centre as 'public realm'. For example, private land currently identified in the DGPRS includes land owned by our client but land also owned by the Cathedral and Canal and River Trust. To be clear if the DGPRS was sought to be used as a vehicle to allocate land as 'public', this would be unlawful. However, even if the document were not seeking to 'allocate' land, identifying private land in an SPD as 'public realm' may have the unintended consequence of undermining our clients ability to exercise their rights and ability to use their private land as they see fit. Therefore our client would respectfully suggest that a number of changes are made:</p> <ol style="list-style-type: none"> <li>1. (1)It is made clear by a statement in the introduction to the document that the DGPRS is not a land use planning document.</li> <li>2. (2)That a statement is made clarifying the purpose of the DGPRS is to provide additional guidance on preferred materials and the design approach supported by the Council to areas of 'Public Realm' in the strategy area. In this regard the SPD provides additional guidance to supplement the emerging Joint Core Strategy and Gloucester City Plan.</li> <li>3. (3)That the document clearly distinguishes between public and private land in the strategy area, ideally through clarifying this on the plans in the document, but notably those on pages 5 and 13. If this is not possible, then text should be added to the document and as notes to the plans that clarify that the strategy areas includes both public and private land.</li> <li>4. (4)The plan on page 20 identifying 'Public Realm Projects' should be updated, to either omit those on private eland, such as Orchard Square, or identify that</li> </ol>	<p>category would involve granite pavers to the Highway.</p> <p><b>Noted. The main Categories of Spaces plan indicates three distinct types of spaces, which include a range of different types of land classification, including private and City and County Council owned. The response notes set out below aim to provide specific answers to the points raised.</b></p> <p><b>Noted. Paragraph 1.6 within the Introduction chapter will be amended with additional text to cover points 1 and 2.</b></p> <p><b>Noted. The document will be amended to include a caveat statement, as it is not seen as beneficial to complicate the simplicity of the Category of Spaces plan. Section 4.2 will be amended to include an additional paragraph explaining the issue in more detail, with the heading altered to 'space classification'.</b></p> <p><b>Noted. In addition to the amended para within the introduction chapter, an additional</b></p>
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	<p>these are privately owned areas where given some public use, the same high quality treatment of the spaces in terms of material and design are sought as for areas of ‘public realm’.</p> <p>Character Areas (p13). How have these been determined and how should they specifically inform spatial proposals within them (as against the Category of Spaces from p27 onwards)? Useful to cite evidence base.</p>	<p><b>paragraph will be inserted after 3.7.4 explaining this issue.</b></p> <p><b>Noted. The differences between distinct character areas is evidenced through the Conservation Area Appraisals which are available to view or download from the Gloucester City Council website.</b></p>
<p><b>Strategy: Proposed Materials</b></p>	<p>The graphical matrix is not clear, and uses too much modular/block/stone.</p> <p>Recommend the use of coloured surfacing, for all vehicle routes, and conservation kerbing, rather than granite setts.</p>	<p><b>Noted. The graphical matrix provides images and descriptions of each type of material suggested for each part of the public realm, arranged into the three categories of spaces identified on the plan on page 27. The use of higher quality stone, sometimes using smaller module sizes, provides an enhanced appearance, compared to the standard materials but alternatives would be considered during any design process. The use of higher quality natural stone in selected areas would also better relate to areas of historic importance.</b></p> <p><b>Noted. There are a number of issues regarding the use of coloured surfacing, including issues around maintenance and reinstatement, including coloured surfaces showing oil and tyre marks, and where road works have taken place, inappropriate reinstatement often leads to a patchy and negative appearance. For secondary routes, the use of restricted areas of dark grey tarmac, combined with higher</b></p>

	<p>The maintenance of uneven surfaces like cobbled stone and stone slabs is of utmost importance to avoid trip hazards or twisted ankles.</p>	<p><b>quality pedestrian areas is proposed in the PRS. Conservation kerbing is suggested for secondary routes, with the higher quality granite for the primary areas. The PRS is a guide and some variation is expected in final material selection.</b></p> <p><b>Agree and noted.</b></p>
<p><b>Strategy: Design Affecting visually impaired, disable or Elderly Groups</b></p>	<p>More zebra crossings advisable to guard the safety of pedestrians and people with mobility difficulties. Specific concerns are:</p> <ul style="list-style-type: none"> <li>-The access ramp leads past the Gloucester Museum and the Conservative Club to the Eastgate Centre;</li> <li>-The crossing point for mobility scooters coming from Shopmobility past Sahara Lounge;</li> <li>- Difficulties for people with mobility difficulties who want to enter the Eastgate Centre adjacent to the ramp that leads to the Eastgate Centre.</li> </ul> <p>The train station is in close proximity to the hospital but only for those who can navigate the subway. This should be made pram / wheelchair accessible, or a second exit provided to lead to Great Western Road.</p>	<p><b>Noted. The PRS sets out broader principles which aim to guide future detailed public realm proposals.</b></p> <p><b>Agree. The link between the train station and the hospital area, via the subway, is identified as part of the strategy area, and is one of the regeneration priorities for the City.</b></p>
<p><b>Strategy: Highways</b></p>	<p>Reference is made to Manual for Streets (MfS) and Table 3.1 of MfS is a useful process to apply to proposed changes to existing streets. The process consists of 7 Stages and a Non Motorised Users Context Report should have been undertaken in Stage 2 – ‘Objective Setting.’ It would also appear appropriate that Stage 4 – ‘Quality Auditing’ should be undertaken at this stage (section 3.7 of MfS) to support the Strategy. As a minimum this Audit should include a Road Safety Audit (including a Risk Assessment), access, walking and cycle audits and a Non Motorised Users Audit.</p> <p>Proposal to create “places” at street intersections – these must be able to</p>	<p><b>Noted. The PRS sets out broad design principles which aim to guide further more detailed proposals for specific areas. All the relevant guidelines will be considered at the more detailed level.</b></p>

	accommodate large vehicle turning movements – so modular paving and street furniture should be avoided. Low height kerbing (40-60mm) is generally unpopular with visually impaired users as they are harder to distinguish. Setts are inappropriate for highway areas, as they are not robust	
<b>Strategy: Lanes</b>	We note that there seem to be several streets which we would classify as “lanes” which have not been noted as such in the figure on page 27 of the strategy.	<b>Noted. The ‘extent of strategy area’ plan on page 13 shows the areas covered under the PRS. It may be that there are examples of lanes which lie outside the strategy area. The lanes shown within the strategy area have been identified as sharing a similar character.</b>
<b>Strategy: Secondary Streets and Spaces</b>	The area around Wilkinson’s, especially the building where Cash Converters currently exists, are terribly ugly and in dire need of being replaced or facelifted so I do hope there are plans for that.	<b>Noted. This area is highlighted on page 17 of the document as an activity hotspot, which would benefit from improvements to the public realm.</b>
<b>Strategy: Precedent Projects</b>	Tree planting and retention can play in improving air quality in Gloucester. The Woodland Trust has published a report entitled <u>Urban Air Quality</u> which explains how trees can specifically help improve air quality. A good example from a nearby local authority can be seen in the Bristol Central Area Plan adopted in March 2015 – viii, 6.13, 6.14.	<b>Noted.</b>
<b>Strategy: The Via Sacra</b>	The design of the markers around the route could be created through a competition so city residents can contribute to the creation of these markers along this route.	<b>Noted.</b>
<b>Street Furniture: Principles</b>	<p>The lack of mention of the importance of placing any type of street furniture in such a way as to protect long distance key views, although the desire to provide keys views to those using the street furniture is mentioned.</p> <p>Signage, boundaries, trees, public art and benches can all interrupt key views. The recent concern regarding the advertisement pods in Gloucester Docks can show how important siting and design can be to protect key views but also highlights that due to the wide range of different character areas within the city, particularly within the</p>	<p><b>Noted. There are possible situations where street light columns could interfere with clear views, but any proposed light columns would take into account this issue.</b></p> <p><b>Agree. The PRS is at least partly based on the principle that the design of public realm should be suitable for the character of each area, meaning that a single design approach would</b></p>

	<p>primary streets and spaces area, there may not be an acceptable design which fits all locations. Paragraph 4.1.1 states; <i>Materials used within public realm projects must be high quality and suitable for the character of the area in which they are placed.</i> Should this be widened to include mention that the design should also be suitable for the character of the areas in which they are placed?</p> <p>We agree with the principles, our particular emphasis would be for usability, maintainability and robustness with a <b>limited</b> material palette, and clear arrangements for licensing of street furniture, particularly where provided/promoted by the City Council. We would request that you emphasise the “limited” palette. Ownership and licensing of street furniture, particularly where provided by the City Council, should be clear. The City Council cannot license itself.</p> <p>Any street furniture should be designed and selected to limit ASB and skateboard damage.</p> <p>Street Furniture (p39-). Should this be distinctive to Gloucester?</p>	<p><b>not be suitable.</b></p> <p><b>Agree. Some of the key issues to consider include functionality, robustness and low maintenance cost, while also considering the appearance of the public realm.</b></p> <p><b>Noted.</b></p> <p><b>Noted. Developing an approach to public realm design which responds to the distinct character areas within Gloucester, is a key part of the PRS. This concept is detailed within the design principles on page 40.</b></p>
<p><b>Street Furniture: Signage</b></p>	<p>Currently signs that indicate where landmarks and places of public interest are found, for example the Gloucester Museum, use a very faint font which makes it hard for residents and visitors to read. These should be replaced with signs that meet the approval regarding size and readability of many older residents.</p> <p>The example of “Museum Zeughaus” form page 51 of the Draft brochure looks eye-catching and attractive and might help guide visitors and residents to attractions off the</p>	<p><b>Noted. The principles for signage and road markings are set out on page 46 of the strategy. The clarity or legibility of the signage is a very important consideration, which includes issues relating to colour, size of text, position within the street, height above ground level and the overall form of the signage. The first bullet point in para 5.7.9 will be amended.</b></p> <p><b>Agree. The Museum Zeughaus example is clear and legible, with good contrasts of colour.</b></p>



	<p>beaten track like Gloucester Library.</p> <p>Statutory requirements as set out in the Traffic Signs Regulations and General Directions (TSRGD) 2016 for road signage and marking must be met.</p> <p>We are surprised to see the digital mobile phone type signage shown as an example of 'high quality signage'. In the future, when this type of phone is seen as old fashioned the signage will appear equally so. We suggest a more timeless style is adopted, particularly for sensitive areas. The scale and consequent impact on the heritage settings of buildings make this type of signage incongruous in many of the primary streets and spaces.</p>	<p><b>Noted.</b></p> <p><b>Noted. The form of this type of signage is partially replicated in the existing wayfinding signs, as well as in the high quality example from Bath. The choice of materials and finish is a key consideration and can have a significant impact on the overall impression of the signage.</b></p>
<p><b>Street Furniture: Public Art</b></p>	<p>There should be a piece of public art to mark the cross.</p> <p>Please get rid of the ugly black statues near the zebra crossing at the quays shared space they make the city look terrible.</p> <p>More art is a nice idea, as suggested, but please no more ugly modern art. That rusty needle at the docks is not attractive.</p> <p>To ensure any art is adopted by the community, their involvement in its design or selection would be vital.</p> <p>To further ensure the art is accepted, it would help to offer some element of interpretation or explanation. For all the years I have been visiting Gloucester for work or business, I never knew what the Westgate Wave represented and was oblivious to</p>	<p><b>Noted. There are various technical and functional issues with placing a structure at The Cross, including potential for archaeology, impacts on below ground services, impacts from vehicle movements, blocking of views and blocking of desire lines.</b></p> <p><b>Noted. The refurbishment of the artworks could improve the appearance of those features.</b></p> <p><b>Noted.</b></p> <p><b>Noted.</b></p> <p><b>Noted. Interpretation of artworks is an important aspect of their provision and can aid the understanding and appreciation of the artworks.</b></p>

	the building outlines within the paved surface.	
<b>Street Furniture: Litter Bins</b>	<p>The negative early impressions we have are of the huge amounts of litter bordering the verges of the ring roads, visible all winter. The amount in the budget allocated to street cleaning and litter picking should be ring-fenced and significantly increased, not cut.</p> <p>Altogether there seems a lack of waste bins along the arteries leading towards the town centre, for example along Barton Street, from Asda, from the train station to the bus station. Where there are recycling bins these are often far away from litter bins. .</p> <p>While the design of the proposed litter bin looks good, it would be a shame to create unnecessary landfill by not providing incentives to recycle more. It would be good to reinstate a recycling station which is attractive through colorful bins / lids according to the waste that can be deposited. Such as the seemingly well used one previously on Kings Square. In the Gate Streets it would make sense to replace conventional litter bins with such recycling stations to reduce landfill waste and to make recycling easier and more accurate.</p> <p>In the park, litter bins must be closer to the benches, and emptied more often, especially after weekends, as the bins often overflow and attract seagulls which are often seen as off-putting by residents and visitors.</p>	<p><b>Noted. Street cleaning and general maintenance are important functions related to the provision of good public realm.</b></p> <p><b>Noted. The provision of accessible waste facilities is important. Combining litter bins with a recycling function can be a good approach to provision.</b></p> <p><b>Agree.</b></p> <p><b>Noted.</b></p>
<b>Street Furniture: Bike Storage</b>	There is little mention of cyclists within the city centre, although they are noted as the second highest hierarchy of users in table SD5a (Page 11)	<b>Noted. Table SD5a sets out the order in which the different transport modes should be considered during the design process. At the more detailed design stages, provision for pedestrians and cyclists will form a key element of new areas of public realm.</b>
<b>Street Furniture: Trees and Planting</b>	<p>I am very much in favour of adding street trees and planted areas near benches to create a sense of calm like the image of Clapham Old Town shows.</p> <p>I am very much in favour of well-maintained planters and street trees. At present many</p>	<p><b>Noted.</b></p> <p><b>Noted.</b></p>

	<p>beds and planters around central Gloucester are only occasionally looked after. This led to many of the birch tree planters drying out and dying which was a real shame, given the good idea of the bee-friendly planters.</p> <p>The picture of the bricks around the tree roots on page 37 clearly shows a lack of understanding how trees grow! Removing more of these bricks and replacing them with stone that tapers into the ground will reduce these trip hazards. Alternatively a substantial loose fitting grille around the trees will allow rainwater into the soil as well as removing this trip hazard. There should also be more space for large planted containers and street trees within these streets and spaces. They will add to the attractiveness of the area.</p> <p>Intelligent use of water features and elements used in Sustainable Urban Drainage Systems (SUDS) will be beneficial and forward looking in these particular areas.</p> <p>The principles for street trees and planters at 5.6.4 and 5.6.5 are supported. It could perhaps be added under the 4th bullet beneath 5.6.4 that wildlife (biodiversity) value such as for insects and birds might also be a consideration to factor in?</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: green roof systems and roof gardens; green walls to provide insulation or shading and cooling; new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Whilst we welcome the introduction of a set of principles to be followed should new planting be considered, we believe that there should be a stated ambition to not only maintain but increase the tree cover within the public realm strategy.</p> <p>Any mulching materials used with on planters or other landscaping features should carefully choose the materials used to restrict criminal or ASB activities.</p>	<p><b>Agree. Considering how trees grow over time and the impacts is essential. The use of tree grilles is a good way to mitigate the impacts of tree roots while also adding a decorative feature.</b></p> <p><b>Noted.</b></p> <p><b>Noted.</b></p> <p><b>Noted.</b></p> <p><b>Noted. An increase in street trees would have to be carefully considered, given issues relating to underground services and archaeology.</b></p> <p><b>Noted.</b></p>
<b>Street</b>	To avoid any conflict and reduced capacity, the lighting and landscaping should be	<b>Noted.</b>

<p><b>Furniture: Lighting</b></p>	<p>designed and maintained to be compatible with CCTV system.</p> <p>Subtle lighting from bollards or under seat would help create a mood or atmosphere, and should be used in conjunction with other lighting methods.</p>	<p><b>Noted. This approach is a good way of enhancing areas after dark.</b></p>
<p><b>Document/ Textual Amendment</b></p>	<p>Sections 3.8 and 3.9 are mentioned in the Contents page, but do not appear in the document. Point 4.9.3 has been wrongly numbered 6.9.3.</p> <p>The document was too long, too small writing and didn't encourage me to read the detail or be able to comment properly. Flashy pictures and lots of small text doesn't make a document good.</p> <p>We wish to highlight a possible anomaly in that paragraph 3.3.2 indicates that the Docks lie outside of the central strategy area.</p> <p>The extent of the strategy covers a well built up area but it is noted that adjoining land use areas such as Alney Island and Gloucester Park are usefully highlighted in the summary leaflet. This version of the 'category of spaces' diagram with annotations showing Alney Island and Gloucester Park should also be used in the main document in our view. Otherwise the link with adjacent open spaces for recreation is not made as well as it could. This version also helps readers, including those not as familiar with the City, to orientate themselves</p> <p>It might be helpful at the outset to identify who the document is for and how you expect it to be used. This could include reference to its status (SPD?), and its relationship with other relevant management or policy documents/provisions such as the parallel Shopfronts etc. Design Guidance being produced.</p> <p>Although the document refers to relevant sources of information that have informed the exercise (2.1, p10) it might be useful to have this summarised as a reference list at the back. There is no mention of Historic England's Street for All Guidance - <a href="https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/regional-">https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/regional-</a></p>	<p><b>Agree.</b></p> <p><b>Noted.</b></p> <p><b>Noted. The reference to the Docks and Quays will be removed from paragraph 3.3.2.</b></p> <p><b>Agree. The version of the Categories of Spaces plan which is shown in the leaflet will be used in the main strategy documents.</b></p> <p><b>Agree. A reference to the planning status of the document will be included in the final version.</b></p> <p><b>Noted.</b></p>

	<p>documents/</p> <p>Images: Helpful to have annotations against these throughout, ideally explaining not just what they are showing but why they are relevant – especially when citing them as precedent projects (i.e. pp5, 8, 21, and 25). This is particularly helpful where examples from other places or countries are used as contexts can often be very different. Probably also better to use images of schemes actually implemented to ensure their credibility. References to exemplars from elsewhere might also consider including the Bath Public Realm and Movement Strategy and Pattern Book.</p>	<p><b>Noted.</b></p>
<p><b>Layout and graphics alterations</b></p>	<p>Contents page: Sections 3.8 and 3.9 deleted.</p> <p>Introduction (p.7): Objectives box moved and paragraphs added.</p> <p>Section 2.1 (p.10): Additional paragraph.</p> <p>Section 3.7 (p.21): Additional paragraph.</p> <p>Section 4.2 (p.26): Additional paragraph.</p> <p>Section 4.3 (p.27): Movement of paragraph 4.3 and alteration to the Categories of Spaces plan.</p>	<p><b>These sections are no longer in the document.</b></p> <p><b>Layout improvement and additional text in response to consultation process.</b></p> <p><b>Additional text following consultation response.</b></p> <p><b>Additional text following consultation response.</b></p> <p><b>Additional text following consultation response.</b></p> <p><b>Improvement to the layout to reduce amount of blank areas on the page. Location labels added to plan to make it easier to understand.</b></p>

	<p>Section 4.5 (p.30): Alteration to position of the photos and addition of subtitles.</p> <p>Section 5.5 (p.42): Alterations to text and image layout.</p> <p>Section 5.6 (p.44): Additional paragraph and movement of photos.</p> <p>Section 5.7 (p.46): Text format alteration and movement of photos from subsequent page.</p> <p>Section 5.8 (p.48): First column moved to previous page and photos on subsequent page moved.</p> <p>Section 5.9 (p.51): Photos of local public artworks added.</p>	<p><b>All the granite photos are now along the top row and captions now identify each photo.</b></p> <p><b>Blank areas of page have been reduced and photos moved to allow for text from subsequent sections to be moved.</b></p> <p><b>Additional text following consultation response. Photos moved to reduce blank areas on page.</b></p> <p><b>Blank areas of page reduced with new layout allowing subsequent content to be moved.</b></p> <p><b>Reducing blank areas and allowing the next section to start on a new page.</b></p> <p><b>Reduction in blank space and two prominent local examples of public artworks to improve section.</b></p>
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