

GLOUCESTER CITY COUNCIL

COMMITTEE : **PLANNING**

DATE : **3RD MARCH 2015**

ADDRESS/LOCATION : **'UPPER DECK', GLOUCESTER QUAYS
OUTLET CENTRE**

APPLICATION NO. & WARD : **14/01400/COU
WESTGATE**

EXPIRY DATE : **27TH JANUARY 2015**

APPLICANT : **GLOUCESTER QUAYS LLP**

PROPOSAL : **CHANGE OF USE OF UPPER DECK OF
FACTORY OUTLET CENTRE (OVER
CENTRAL CORE OF UNITS) TO USE CLASS
A1 FOR ANTIQUES CENTRE**

REPORT BY : **ADAM SMITH**

**NO. OF APPENDICES/
OBJECTIONS** : **SITE PLAN
4 REPRESENTATIONS**

1.0 SITE DESCRIPTION AND PROPOSAL

- 1.1 The application site is the area above the central core of outlet centre units at the southern end, known as the 'upper deck'. It can be seen from the internal walkways, above the shops with a glazed barrier to the perimeter. The upper deck area is some 1158sq metres. Access is currently available from the first floor car park. There are lifts and stairs between the levels.
- 1.2 The proposal is to change the use of the upper deck area to retail use for the Antiques Centre. The proposed plans indicate an escalator from the ground floor to the upper deck from the main entrance area (where the existing customer services desk is) and further additional accesses to the upper deck from the cut through between the two main walkways.
- 1.3 The application is referred to Committee at the Development Control Manager's discretion given the issues involved and concerns raised in representations.

2.0 RELEVANT PLANNING HISTORY

- 02/00271/OUT
- 2.1 This was the application for Outline Planning Permission for the Gloucester Quays site. The application was for major mixed use development comprising

new build and reuse of existing buildings to accommodate residential development (approx. 1000 units); food retail store (approximately 7,800 sq. metres); retail factory outlet centre (approximately 20,000 sq. metres); new Gloscat education campus (approximately 19,000 sq. metres); employment development (approximately 9500 sq. metres); hotel (80 beds); leisure development (approximately 6000 sq. metres) and the provision of associated car parking, servicing and infrastructure including a new road link across canal. Outline Planning Permission was granted by the Secretary of State on 22nd June 2006. A renewal of the permission was agreed by Members at the January Committee meeting pending the completion of legal agreements.

07/00708/REM

- 2.2 This reserved matters application was for a mixed use scheme consisting of a Retail Factory Outlet Centre, 15 residential flats, leisure floorspace (including A3, A4 & A5 food & drink) together with associated multi-level car parking (1311 spaces), bus and taxi facilities and landscaping. Approval of reserved matters was given 4th September 2007.

07/00771/FUL & 10/00894/REP

- 2.3 This was the application for the conversion and refurbishment of Lock Warehouse with retail/restaurant use on ground floor, 26 no. residential units above and associated cycle and bin storage. It was granted subject to conditions on 4th February 2008 and renewed on 19th November 2010, and was associated with a unilateral undertaking that included a commitment to relocate the Antiques Centre to an alternative location within the Docks or nearby surrounding area to provide a continuing presence of the Antiques Centre without materially interrupting the continuity of trading.

08/01566/COU

- 2.4 This was an application for the change of use of the first and second floors and part of the ground floor of the former Matthews Furniture Warehouse (known as Building P of the Gloucester Quays development) for retail use by the Antiques Centre (the relocation from Lock Warehouse). It was granted subject to conditions on 9th March 2009.

09/01281/COU

- 2.5 This application was for the change of use of part of the upper floor of Building E of the Gloucester Quays development from office, storage and service space to retail use for the Antiques Centre, with associated ground floor access, and alterations to and use of the connecting bridge over High Orchard Street for the Antiques Centre. It was granted subject to conditions on 9th February 2010 but not implemented.

14/01370/FUL

- 2.6 This was an application to change the use of part of the first floor and part of the ground floor (for access) of Block E (at east side of High Orchard Street) to offices (Use Class B1). It was granted subject to conditions on 5th February 2015.

3.0 **PLANNING POLICIES**

Central Government Guidance - National Planning Policy Framework

- 3.1 This is the latest Government statement of planning policy and is a material consideration that should be given significant weight in determining this application.

Decision-making

The NPPF does not alter the requirement for applications to be determined in accordance with the development plan unless material considerations indicate otherwise. In assessing and determining applications, Authorities should apply the presumption in favour of sustainable development. For decision-making, this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent, or relevant policies are out of date, granting planning permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole; or
 - specific policies in the NPPF indicate development should be restricted.

Authorities should look for solutions rather than problems and decision-takers should seek to approve applications for sustainable development where possible.

Core planning principles

Planning should:

- Be genuinely plan-led;
- Be a creative exercise in ways to enhance and improve places;
- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- Secure high quality design and a good standard of amenity;
- Take account of the different roles and character of different areas;
- Support the transition to a low carbon future, take account of flood risk and encourage the use of renewable resources;
- Contribute to conserving and enhancing the natural environment and reducing pollution;
- Encourage the effective use of land by reusing brownfield land;
- Promote mixed use developments;
- Conserve heritage assets in a manner appropriate to their significance;
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;

- Take account of and support local strategies to improve health, social and cultural wellbeing and deliver sufficient community and cultural facilities and services to meet local needs.

The NPPF is topic based on a similar basis to the previous PPGs and PPSs:

Building a strong, competitive economy and Ensuring the vitality of town centres

The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.

The NPPF retains a recognition of town centres as the heart of communities and encourages the pursuit of policies to support their vitality and viability.

The sequential and impact tests are maintained for planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date Local Plan.

Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more the 'impact' factors, it should be refused.

Promoting sustainable transport

Seeks to ensure developments generating significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Decisions should take account of whether;

- The opportunities for sustainable transport modes have been taken up;
- Safe and suitable access to the site can be achieved for all people;
- Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented on transport grounds whether the residual cumulative impacts of development are severe.

Requiring good design

Emphasis is retained on good design, seeking to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, optimise the potential of the site to accommodate development, respond to local character and history while not discouraging innovation, ensure safe and accessible environments, and are visually attractive as a result of good architecture and appropriate landscaping. Permission should be refused for development of poor design that fails to take opportunities for improving areas.

Promoting healthy communities

Encourages the involvement of all sections of the community. Decisions should aim to achieve places which promote;

- Opportunities for meetings between members of the community who might not otherwise come into contact;
- Safe and accessible environments;

- Clear and legible routes, high quality public space that encourage use.

Decisions should also;

- Plan positively for shared space, community facilities and other local services;
- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

The importance of access to high quality open spaces is also emphasised.

Planning obligations and conditions

Planning obligations should only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development: and
- Fairly and reasonable related in scale and kind to the development.

Planning conditions should only be imposed where they are

- Necessary;
- Relevant to planning and to the development to be permitted;
- Enforceable;
- Precise; and
- Reasonable in all other respects.

The National Planning Practice Guidance has also been published to accompany and in part expand on the National Planning Policy Framework.

The Development Plan

3.2 Section 38 of the Planning and Compulsory Purchase Act 2004 has established that - "The development plan is

(a) The regional spatial strategy for the region in which the area is situated, and

(b) The development plan documents (taken as a whole) which have been adopted or approved in relation to that area.

If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy that is contained in the last document to be adopted, approved or published (as the case may be). If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

Local Plan

3.3 The statutory development plan for Gloucester remains the City of Gloucester Local Plan (Adopted 1983 and partially saved until the Local Development Framework is adopted). Under the terms of the NPPF, weight can be given to these policies according to their degree of consistency with the NPPF.

3.4 Relevant saved 1983 Local Plan policies are as follows:

T1f – Provision for pedestrians in the city centre outside the main shopping area.

T4a – Differential charging of short and long stay car parks to discourage inappropriate use.

T6 – Measures will be introduced to encourage cycling.

S1 – The sub-regional shopping status of Gloucester will be maintained and strengthened within the context of its position in the pattern of shopping facilities in Gloucestershire. All comparison shopping facilities will be concentrated within the city centre other than where expressly stated to the contrary.

S1a – Major comparison shopping facilities will not normally be permitted outside the main shopping area other than in accordance with the specific provisions of other policies.

3.5 Subsequent to the 1983 plan there has also been the City of Gloucester (Pre-1991 Boundary Extension) Interim Adoption Copy October 1996), and City of Gloucester First Stage Deposit Local Plan (June 2001).

3.6 Regard must also be had to the 2002 Revised Deposit Draft Local Plan. This has been subjected to two comprehensive periods of public and stakeholder consultation and adopted by the Council for development control purposes. This cannot be saved as it is not a formally adopted plan, however with it being adopted for development control purposes it is still judged to be a material consideration. Appeal reference APP/U1620/A/07/2046996 dated 18th March 2008 confirms the degree of weight that may be afforded to the 2002 Revised Deposit Draft Local Plan. It is considered that particular weight may be afforded to those policies that attracted a limited number of, or no objections during the consultation stages. In his decision the Inspector stated the following;

“Although the local plan is not part of the development plan it has been adopted for development control purposes and I give considerable weight to it having regard to the amount of public consultation that it underwent....”

The following policies are of relevance:

Western Waterfront mixed use allocation

BE.4 – Criteria for the layout, circulation and landscape of new development

BE.6 – Access for all

BE.9 – Design criteria for large commercial development

BE.21 – Safeguarding of amenity

TR.9 – Parking standards

TR.11 – Provision of parking for people with disabilities

TR.12 – Cycle parking standards

TR.31 – Road safety

E.1 – Mixed use allocations (MU.2 Western Waterfront)

S.2a – Bakers Quay (factory outlet centre)

S.4a – New retail development outside designated shopping centres

T.1 – Visitor attractions in the central area

Emerging Plan

- 3.7 In terms of the emerging local plan, the Council has prepared a Joint Core Strategy with Cheltenham and Tewkesbury Councils which was submitted to the Planning Inspectorate on 20th November 2014. Policies in the Submission Joint Core Strategy have been prepared in the context of the NPPF and are a material consideration. The weight to be attached to them is limited by the fact that the Plan has not yet been the subject of independent scrutiny and does not have development plan status. In addition to the Joint Core Strategy, the Council is preparing its local City Plan which is taking forward the policy framework contained within the City Council's Local Development Framework Documents which reached Preferred Options stage in 2006.

On adoption, the Joint Core Strategy and City Plan will provide a revised planning policy framework for the Council. In the interim period, weight can be attached to relevant policies in the emerging plans according to

- The stage of preparation of the emerging plan
- The extent to which there are unresolved objections to relevant policies; and
- The degree of consistency of the relevant policies in the emerging plan to the policies in the National Planning Policy Framework

The following policies of the Submission JCS Document are of relevance:

SD1 – Presumption in favour of sustainable development

SD2 – Employment

SD3 – Retail hierarchy

SD5 – Design requirements

SD15 – Health and environmental quality

INF1 – Access to the transport network

INF2 – Safety and efficiency of the transport network

- 3.8 All policies can be viewed at the relevant website address:- Gloucester Local Plan policies – www.gloucester.gov.uk/planning; Gloucestershire Structure Plan policies – www.gloucestershire.gov.uk/index.cfm?articleid=2112 and Department of Community and Local Government planning policies - www.communities.gov.uk/planningandbuilding/planning/.

4.0 CONSULTATIONS

- 4.1 The Highway Authority raises no objection subject to a condition to prevent 'open A1' retail sales.

- 4.2 The Planning Policy Department has not commented.

5.0 PUBLICITY AND REPRESENTATIONS

- 5.1 The application was advertised by site notices. 4 representations have been received. Other representations have been submitted to the related application 14/01398/COU to convert the existing Antiques Centre premises to offices (also on this Committee agenda) but clearly comment on the proposed new location raising similar concerns.

- 5.2 Issues raised in the representations may be summarised as follows:
- The Antiques Centre has been an important landmark at the Docks for over 30 years
 - Along with the Docks it is second only to the Cathedral as Gloucester's main tourist attraction and is responsible for thousands of visitors. It outranks the Quays on Trip Advisor feedback scores
 - The prominent current location is a factor in this
 - The proposed new location is anonymous, impersonal and characterless, not suitable for retailing.
 - The only access is off the car park
 - It would create difficulties with delivering/collecting stock
 - People will not bother to try to find the new location
 - The Antiques Centre relies significantly on passing trade and the loss of a shop window and off street access is fundamental
 - The proposal for an escalator appears only to be a vague 'future' proposal and would cause disruption
 - The Antiques Centre is fragile and does not travel well
 - Traders will be reviewing their positions
 - The viability of the Antiques Centre and the proposed changes have not been discussed with the tenants
 - There have been no communications regarding the viability of the centre should these changes not take place, the move, or marketing
 - The proposed marketing speaks woefully inadequate and does not indicate a commitment
 - The proposal would almost certainly lead to the demise of the Antiques Centre
 - Traders have built up custom that helps towards the general well-being of the Quays
 - The relocation would be detrimental to the well being of the Quays
 - Offices are inappropriate in a shopping centre
 - Office jobs can be located anywhere
 - There are unoccupied buildings that would suit office use without destroying the flow of the retail environment
 - The proposal is not for the benefit of Gloucester
 - It would make more sense to move to adjacent ground floor units

I circulated to the objectors the supplementary material recently received from the applicant regarding the relocation proposals, signage and marketing, proposed layout and servicing, with a deadline of 27th February to comment. Some further responses have already been received.

- 5.3 The full content of all correspondence on this application can be inspected at Herbert Warehouse, The Docks, Gloucester, prior to the Committee meeting.

6.0 OFFICER OPINION

- 6.1 It is considered that the main issues with regard to this application are as follows:

- Economic considerations
- Traffic and transport

Economic considerations

Sequential test

- 6.2 The proposed retail use is a 'main town centre use' under the terms of the NPPF and the sequential test must be considered. However, the proposal is for a particular operation to be accommodated here, one that has historically been within the Docks and allowed to relocate to the current location in 2009.
- 6.3 While planning policy has been altered in the intervening period, the general thrust as applicable here has not and the rationale behind that 2009 decision holds firm in this new application – this is the same Antiques Centre operation involved that has historically been outside the primary shopping area, and there was a stated desire (taking effect through the unilateral undertaking associated with the Lock Warehouse conversion scheme) for the Antiques Centre to remain in the Docks vicinity and outside the primary shopping area.
- 6.4 Furthermore the relocation would be 150 metres to the south and in the same complex. Although it is just outside the zone of search in the earlier 'relocation' undertaking I do not consider that this is objectionable as a matter of principle.
- 6.5 This particular justification against the sequential test considerations does require a condition to restrict it to just such an antiques sales operation, as other retail sales have not been justified and could well not be policy-compliant, and would not benefit from the particular 'exception' cited above. This is also proposed by the applicant.

Impact test

- 6.6 The proposal is below the NPPF threshold for an impact assessment and I do not consider that there are special circumstances to request one. Suitably conditioned, a permission would facilitate the relocation of the same Antiques Centre business at a similar scale. It appears unlikely that the effect on the City centre would change much.

Suitability of new premises

- 6.7 The applicants acknowledge that the continuity of trading of the Antiques Centre is a key issue for the application, including its location and accessibility. A difficulty with this proposal is the apparent diverging opinions between the applicant and traders about the suitability of the new location.
- 6.8 I understand that the applicant is the owner of the Gloucester Antique Centre. The applicant wishes to make clear that without the relocation, the continued future trading of the centre is very uncertain. Therefore they argue that doing nothing is not an option, but they are committed to trying to provide a viable future for the Antiques Centre. The relocation is proposed as delivering appropriate premises that are still within a central location, allow a more stream-lined operation to be put in place, reducing overheads and providing a more flexible form of accommodation. They note that this would be a more

accessible location, improve the functionality and layout being over one level, provide enhanced and level access by car for collection of larger items and better access to the servicing arrangements of the outlet centre for delivery of bulky items, and that this can only be of benefit to the traders. The existing Antiques Centre premises has a floor area of approximately 1017sq m so there would be a modest increase in the size of facility (to 1158sq m). The applicant proposes that this would have no material impact on the operation of the Antiques Centre as a business.

- 6.9 Several traders meanwhile raise concerns about the appropriateness of this new location. The concerns appear to distil down to the visual presence and ability to access the new location, and the ability to service it.
- 6.10 The installation of an escalator at the 'front' end of the upper deck up from the entrance area would facilitate direct access from ground floor, and could be signed within the centre to make its location clear to the passing visitors that are so important to the traders. The additional accesses shown at the 'rear' of the upper deck from the cross-mall cut through would also assist. Of course it is possible that potential customers would not want to bother finding it.
- 6.11 Furthermore, the applicant has recently sought to respond to some of these concerns and provided some indicative details of a new range of signage to advertise the location of the Antiques Centre on the upper deck. They propose to implement a comprehensive new signage and marketing strategy for the Antiques Centre including on-line marketing.
- 6.12 In terms of servicing, the car park right outside the upper deck would appear to make servicing from cars and customers taking goods out easier than the current location. In respect of larger items (and from my visit the Antiques Centre does include some larger items of furniture such as tables, sofas and chests of drawers), I am advised by the outlet centre manager that delivery vehicles over 2.1 metres would use the outlet centre's delivery area A (next to the car park entrance), offload goods to another vehicle and take up into the car park. This is apparently the same arrangement as when they have held events on the upper deck before. They also propose to mark an area adjacent to one of the entrances for deliveries and collections.
- 6.13 This difference in opinion over the suitability of the upper deck is the really challenging issue, given the fears for the future of the Antiques Centre entirely. The Authority must be careful to base the decision on material planning considerations not just aspirations for the most advantageous arrangement for this business. The economic planning issues of siting the Antiques Centre in this part of the City can be overcome by suitable planning conditions, as previously done with the relocation to the current site. Furthermore, looking at it objectively, there appear to be means of addressing the two main issues cited by traders, and while they clearly are better informed about optimum locations for an antiques centre to successfully trade, there is only so far I consider this can be taken in terms of the planning considerations - a potential new site for this tourist attraction nearby to its existing premises has been identified in this application.

- 6.14 Ultimately, the applicant could evict the Antiques Centre at any time (subject to contractual arrangements) and traders would be forced to consider finding new premises themselves if they wanted to continue trading in the same manner. The current application offers an opportunity to do so within the same complex.
- 6.15 With the same restrictive goods condition and a further condition to ensure only one Antiques Centre operates (a 'doubling up' of such retail floorspace has not been justified against retail policy), I would raise no objection to this proposal in terms of economic planning considerations.

Traffic and Transport

- 6.16 The parking provision, customer access for vehicles and trip generation are all likely to be similar to the existing given the location within the same complex and the comparable floorspace. The modest increase is not likely to materially increase the trips.
- 6.17 The assessment is based on an antiques centre use and not other retail and the Highway Authority seeks to ensure this by condition – which also points to the imposition of the restrictive goods condition.

Human Rights

- 6.18 In compiling this recommendation we have given full consideration to all aspects of the Human Rights Act 1998 in relation to the applicant and/or the occupiers of any affected properties. In particular, regard has been had to Article 8 of the ECHR (Right to respect for private and family life, home and correspondence) and the requirement to ensure that any interference with the right in this Article is both in accordance with the law and proportionate. A balance needs to be drawn between the right to develop land in accordance with planning permission and the rights under Article 8 of adjacent occupiers. On assessing the issues raised by the application no particular matters, other than those referred to in this report, warrant any different action to that recommended.

7.0 CONCLUSION

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 7.2 The retail issues can be overcome by conditions to limit there to being one antiques centre retailing antique goods, and this would effectively allow the relocation of an existing business. Similarly this would be satisfactory in terms of highways impact.
- 7.3 Traders evidently have concerns about the new location, while the applicant believes that the proposal will safeguard a fragile business. Objectively, the proposal offers the opportunity to relocate the business nearby and the

applicant appears to offer means of addressing concerns about servicing and the visibility of the centre. With the threat of closing the business outright anyway, granting permission would at least offer this opportunity for relocation. I have considered the relevant policies and the representations and I do not consider that there are any reasons to refuse planning permission.

8.0 RECOMMENDATIONS OF THE DEVELOPMENT CONTROL MANAGER

8.1 That planning permission is granted subject to the following conditions:

Condition

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason

To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Condition

The development shall be undertaken in accordance with the plans referenced CTM GQ1 01 20 1100 – and CTM GQ1 00 20 1100 01 received by the Local Planning Authority on 1st December 2014.

Reason

To ensure the works are carried out in accordance with the approved plans.

Condition

The upper deck area as outlined in red on plan ref. CTM GQ1 01 20 1100 - shall be used for the sale of antiques, reproduction furniture, and ancillary items such as toys, pottery, stamps, bespoke jewellery and general collectibles and for no other purpose within Class A1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to the Class in any statutory instrument revoking and re-enacting that Order with or without modification, unless otherwise agreed in writing by the Local Planning Authority.

Reason

The application seeks to facilitate the relocation of the existing Antiques Centre within the locality, which is considered to be an important attraction for the City. The proposed site is outside the primary shopping area and in the absence of justification for other types of retailing, the condition is necessary to limit the goods that can be sold, and similarly the assessment of impact on the highway is made on this specific form of retailing. This is in accordance with the National Planning Policy Framework, Policies SD3, INF1 and INF2 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Submission Version November 2014 and Policies S.4a and TR.31 of the City of Gloucester Second Deposit Local Plan (2002).

Condition

The use hereby consented shall not be operational at the same time as an antiques centre is operational at the Former Matthews Furniture Building also known as 'Building P' of the outlet centre situated between High Orchard Street and Merchants Road and fronting Llanthony Road.

Reason

The particular justification for the use of this site for antiques centre-retailing is based on relocating the existing business. No retail analysis has been undertaken to justify two antiques centres in operation in this out of centre location therefore the limitation is necessary in accordance with the National Planning Policy Framework, Policy SD3 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Submission Version November 2014 and Policy S.4a of the City of Gloucester Second Deposit Local Plan (2002).

Decision:

Notes:

.....

.....

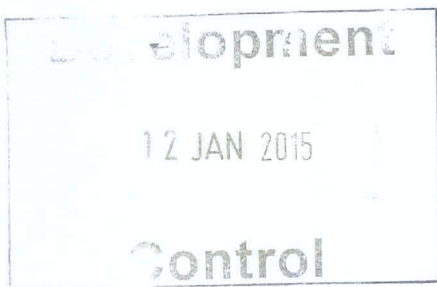
Person to contact: Adam Smith
(Tel: 396702)

14/01400/COU

Gloucester Quays Designer Outlet
St Ann Way
Gloucester
GL1 5SH

Planning Committee 03.03.2015





08/01/15

Ref - 14/01400/COU

Having traded at Gloucester Antique Centre (M & C Stamps) for over 30 years, I feel I can comment with some relevant experience on the proposed plans for relocation.

Since the earliest days of the centre when Eddie Cooke first opened the Lock Warehouse, and 'grew' his vision of an antiques emporium, one floor at a time, through to the more turbulent upheavals of 2013, the City council have always been extremely supportive and unflinchingly protective of this major tourist draw. Hardly surprising - this little gem is regularly only trumped by our magnificent cathedral in terms of on-line 'must visit' reviews of Gloucester, and currently even out-ranks the Quays itself on Trip Advisor feedback scores.

The Centre is, however a fragile asset, and from experience does not travel well. Certainly some of the existing traders will not countenance another move and simply leave, and any inappropriate relocation is likely to spell, at best, years before re-group, recovery and re-establishment, (let alone expansion) are achieved. Recent lack of Quays promotion and advertising means that many customers still think that we are at the Lock Warehouse, or worse still that we have closed for good!

I object to the proposed alternative site for the following reasons.

1) For whatever reason the Upper Deck has never managed to permanently establish itself, despite many attempts at various functions, so the odds are already stacked against a successful Antiques venture. The Gloucester indoor market debacle has demonstrated that successful group growth is from the ground floor upwards. The Quays is currently littered with empty shops on the more favourable ground floor, damaging customer satisfaction and giving the impression that the whole complex is struggling. Surely if we must move, it would make more sense to take over the 3 adjacent empty ground floor units, that are "up and ready to trade" in High Orchard Street for example. This would suit our specific business model and inject an instant 'flourishing' Quays customer impression.

2) There is only one access to the Upper Deck and this is from the car park and not the mall itself. This means the Antique Centre would get no passing trade - hardly appropriate for this showpiece and an effective death knell. Indeed, any customers determined enough to come to the Centre would have to leave the Mall, take the stairs/lift to the upper floor and then negotiate crossing 2 lanes of car park traffic to find the entrance! This safety concern is exacerbated by the fact that stock (often large items of furniture) in and out of the Centre would also be dodging//holding up car park traffic (watch out, four poster bed crossing!!) - clearly a lack of understanding of our business model.

3) The plans detail the installation of an escalator to the Upper Deck. This would doubtless help customer (but not large stock) access, but appears only to be a vague 'future' proposal. Few antique traders willing to move to the upper deck would do so, knowing their more fragile pieces are going to be exposed to jack hammers at a later date, and would need this work to be undertaken 'up front'. I doubt whether existing Mall traders -Pasty Presto/Costa would welcome this construction disruption at all

I am very grateful for the support given by Gloucester Quays through out the 2013 debacle and fully understand the financial business driver for conversion of our current site to offices, but these proposals for relocation are poorly thought out and endanger the future of a valuable city asset, when other less risky options are available. If the Quays are keen to support the Centres continuance and growth, they should be guided by the current management team within Gloucester Antiques Centre who are a safe pair of hands, with years of experience in how this business model works. If this is not the case, then we are again back to looking to the Council to protect one of Gloucester's treasures.

Mick Cant

This application can be considered alongside another application changing the use of the existing antique centre to an office and an obvious enforced move of the antiques centre from its current location. As a trader in GACL (building P) the proposed move to the Upper Deck would seem a real retrograde step and detrimental to the well being of the Quays. The Upper Deck is not a suitable area for retailing and can be likened to recent proposed enforced move of the market in Gloucester centre to an upper area. The results on business are self-evident, and the same principals apply in the Quays. Will people bother to make the effort to try and get to the upper deck, even if they can find it. - I'm concerned that so many will just not bother. It is just not a good location. For the antiques centre the loss of a 'shop window' and off-street access is pretty fundamental for a 'shop' that relies significantly on passing trade. The amount of sales to people who just happened to be walking by is vital and a move into the depths of a shopping complex, and upstairs to boot, just has to be a step in the wrong direction with a considerable reduction in income for all involved. In conjunction with the associated planning application it seems very inappropriate to be putting offices in the middle of a shopping centre, especially on the ground floor where the loss of a shop window is so fundamental, relegating a shop to the depths, well off the beaten track and difficult to find. Customers expect shops - not offices, and customers, once put off are very difficult to get back. For myself, and the other traders, the loss of a 'shop window' and off-street access is pretty fundamental for a 'shop' that relies significantly on passing trade. The amount of sales to people who just happened to be walking by is vital and a move into the depths of a shopping complex, and upstairs to boot, has to be a step in the wrong direction and brings into question the viability of the antiques centre itself. I and others would be reviewing our positions and the complete loss of the antique centre is a possibility. You may not be aware that many traders have spent considerable time and effort in building up trade which helps towards the general well-being of the Quays. I trust the committee will choose to support the traders of Gloucester and turn down this ill-advised application that is not for the benefit of Gloucester.

Mr Stewart Blencowe

Dear Sir, I note the further comments from Sarah Hawkins regarding the proposed planning permissions. It is rather odd that the viability of the Antique centre and the proposed changes have not been discussed with the tenants of the centre nor has there been any communications regarding the viability of the centre should these changes not take place. In addition there has been no input from the Centre/tenants regarding the proposed move – and no exchange of views regarding increased marketing or the new area. As they stand the proposed marketing strategy appears woefully inadequate considering the proposal to move the centre off the beaten track. – This does not indicate a commitment to the centre or it's tenants. Office jobs can be located anywhere – positioning an office in a retail environment is not good marketing practice, visitors expect shops and more shops, not offices,. There are un-occupied buildings that would suit office use in the vicinity without destroying the 'flow' of the retail environment. This does not make for logical development of this retail area and I would urge you to reject this change.

Mr Stewart Blencowe.

As a long time Dealer with a Unit in the Gloucester Quays Antique Centre, I would most strongly urge the Planning Authorities to seriously consider the likely outcome of granting permission for change of use of 'The Upper Deck'. Since its inception over 30 years ago the Antique Centre has been an important landmark at Gloucester Docks and along with The Docks is only second to the Cathedral as Gloucester's main Tourist Attraction, as such The Centre has been responsible for many thousands of visitors benefitting the City over the years. One undoubted reason for this is the continued prominent presence of the Antique Centre within The Docks, therefore to consider relocating it to an anonymous impersonal and characterless location at any time could spell disaster but given the current and foreseeable economic climate would almost certainly lead to it's decline and the eventual demise of an iconic part of Gloucester's recent history. Hopefully you will not let this happen.

Mr Peter Gamble