

City Plan Places, Sites, City Centre Strategy Consultation Responses

City Centre

City Centre Strategy

Issue	Representation	Response
General direction of travel	General support for the general thrust of the draft City Centre Strategy as it provides a firm commitment to improving retail, leisure, culture, business and entertainment in the city.	Support noted
Relationship between the City Centre and Gloucester Quays	Concerns regarding the relationship between the City Centre and Gloucester Quays. Concern that Gloucester Quays undermines the City Centre and that there is a need to ensure that they complement rather than compete with one another. Improve linkages.	Gloucester Quays is subject to a condition that restricts the types of goods that can be sold to ensure it does not directly compete with the City Centre. Any retail proposals at Gloucester Quays would be subject to tests to ensure it does not undermine the City Centre or isn't something that could reasonably be accommodated in the Primary Shopping Area (PSA). It is agreed that linkages are important.
Retail and leisure offer	Need to encourage a wider mix of shops, for example quality independent shops rather than chain or bargain shops. Improve night-time offer which is currently lacking. Encourage more outdoor events to bring people to the city. Need a central theatre to rival the Everyman in Cheltenham. Should be a drive to increase a greater variety of outlets in the 'gate' streets as well as Gloucester Quays.	These issues are identified as weaknesses in the SWOT analysis of the City Centre and are addressed in the draft 'Objectives' and 'Strategy for the City Centre'.

Objectives	General support for the objectives.	Support noted
<p>Objective 3</p> <p>To draw on Gloucester's strengths as an historic city to create a hub for culture, tourism and leisure.</p>	<p>Suggest should read '...to draw on Gloucester's strengths as an historic city, make better use of historic buildings, to create...'</p>	<p>This objective will be met through a range of activities, including the reuse of historic buildings, new builds, festivals, initiatives and so on. It is important therefore this statement remains more generic in nature.</p> <p><i>However, it is appropriate the reuse of historic buildings is amplified further and an additional bullet will therefore be added to the Strategy section to reflect this.</i></p>
<p>Objective 5</p> <p>To deliver a sustainable mix of complementary city centre uses which ensure vibrancy throughout the day and evening.</p>	<p>Could add '...based upon a significantly increased local residence presence.'</p>	<p>This is already adequately addressed at the Strategy section.</p>
<p>Objective 6</p> <p>To improve linkages within the city centre, encouraging the use of sustainable modes of transport whilst providing well located car parking.</p>	<p>This should be more specific and state that we want people to walk, cycle and use public transport rather than cars and include the canal and river as potential transport options.</p>	<p>The objective already refers to encouraging sustainable modes of transport, therefore no change required.</p>
<p>SWOT analysis</p>	<p>General support for the contents of the SWOT analysis – particularly a lack of cultural facilities, poor quality bus station and lack of connectivity.</p>	<p>Support noted.</p>

<p>SWOT analysis – strengths</p>	<p>Disagree that 'The City Centre and its residential areas do not have any issues with the availability of community facilities'. Existing facilities are Council owned and so not meet the needs of Gloucester's most disadvantaged areas. Question whether this should be included as a strength.</p>	<p>An audit of community facilities in April 2013 showed Westgate ward to have 22 facilities that were open to everyone in the community to use. The recognised calculation for assessing the provision of community facilities is 0.44 facilities per 1000 population. This figure is considered best practice and has been used by other local authorities. It is originally sourced from "Shaping Neighbourhood: Health, Sustainability, Vitality" Guise, Barton & Grant (2002).</p> <p>Using this calculation demonstrates that Westgate has 3.3 facilities per 1000 heads of population, way above the recommended 0.44. In comparison, Quedgeley Severnvale has no facilities. Westgate has a range of facility types including education venues, halls associated with places of worship, social and sports clubs and cultural facilities.</p> <p>In terms of the ownership of the community facilities, only 5 of the 22 facilities are owned by the city council."</p> <p>It is therefore considered that the availability of community facilities in Westgate ward should be considered a strength.</p>
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<p>SWOT analysis - weaknesses</p>	<p>Agreed with connectivity as an issue, suggest it should also include Westgate Leisure Park and Archdeacon Meadow. This should also be included as an opportunity.</p>	<p><i>Agree. Amended accordingly.</i></p>
<p>SWOT analysis – threats</p>	<p>Increasing momentum of Gloucester Quays will create an even greater imbalance with the city centre.</p> <p>A great threat is the lack of local residents and this should be embraced in a clearly stated strategic objective.</p>	<p>Noted. The impact on Gloucester Quays on the City Centre was tested at the time the planning application was considered and was found to be unacceptable. If further proposals at Gloucester Quays were submitted to the local planning authority they would be assessed in the same way, to ensure that they wouldn't have a significant adverse impact on the City Centre</p> <p>Equally, through City Plan a number of key regeneration sites in the City Centre will be allocated for appropriate uses, including for example King's Quarter, which will help to provide more of a balanced provision.</p> <p>Disagree. This issue is addressed as part of a more generic objective related to mix of uses and vibrancy and more clearly defined in the Strategy section of document with respect to promoting urban living.</p>

<p>Primary Shopping Area (PSA), Primary and Secondary Shopping Frontages</p>	<p>General support for the identified areas, which have been expanded to include the King's Quarter area. Suggestion that the proposals map should identify 'frontages' rather than 'zones'.</p> <p>Objection to the inclusion of all secondary frontage in the PSA, which is contrary to the NPPF.</p>	<p>Support noted.</p> <p><i>Agreed – the plan will be amended to identify frontages.</i></p> <p><i>The extent of the City Centre boundary, Primary Shopping Area and primary and secondary frontages will be reviewed prior to the publication of the Draft City Plan.</i></p>
<p>City Centre boundary</p>	<p>Mix of responses, some saying the City Centre boundary as drawn is too large, some agreeing with its proposed extent.</p> <p>Suggest city centre could be zoned into areas with similar uses e.g. historic centre.</p> <p>Objection to the city centre not including Gloucester Park which is considered an integral part of the City Centre.</p>	<p><i>Noted. The extent of the City Centre boundary, Primary Shopping Area and primary and secondary frontages will be reviewed prior to the publication of the Draft City Plan.</i></p> <p><i>This is an option to consider, however, at present the City Centre is not considered big enough to identify meaningful 'zones'.</i></p> <p><i>Noted. The extent of the City Centre boundary, Primary Shopping Area and primary and secondary frontages will be reviewed prior to the publication of the Draft City Plan.</i></p>

Residential development in the City Centre	Support policy that supports residential development in the City Centre, which will help to support vitality and viability. Important to ensure development is appropriate for both older and younger people, is of high quality design, appropriate to the area (design) and makes appropriate / timely contributions to investment in infrastructure.	<p><i>Support for city centre policies which encourage a mix of uses including urban living is noted.</i></p> <p><i>The City Centre Strategy sets out broad principles and this will be fleshed out with additional development management policies, which seek to address planning matters including type, tenure, design and delivery of infrastructure.</i></p>
Sequential test / impact test	Strong support for the proposed policy wording, requiring the assessment of proposals for retail development proposals not in the city centre against the sequential test and impact test. Helps to support the PSA and ensure the most is made of public transport services. Suggestion out-of-centre retail is not too much of an issue if there are good public transport facilities.	Support noted.

<p>Heritage</p>	<p>More should be done to make the most of heritage, which is currently under-utilised.</p> <p>There is a need for more tourism infrastructure e.g. hotels, coach parking, car parking.</p> <p>Strategy bullet 11, need more explanatory signage and interpretation.</p>	<p><i>Noted. Agree that the reuse of historic buildings be amplified further with an additional bullet being added to the Strategy section to reflect this. In addition there will be development management policies which will set out the Council's approach to, amongst other things, historic buildings and the historic environment.</i></p> <p><i>Noted. Most of these issues are identified in the SWOT and broad principles around these issues are set out in the City Centre Strategy and will be explored further as part of specific allocation and/or development management policies. However, there is a lack of reference in the Strategy to the role of parking and additional reference will therefore be made.</i></p> <p><i>A tourism strategy is also being prepared by the Council which will inform the preparation of the City Plan.</i></p> <p>Noted.</p>
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Connectivity	<p>Improve connectivity between the Docks and the City Centre.</p> <p>Improve connectivity with the mainline railway.</p>	<p><i>Noted. This is adequately addressed as part of the City Centre Strategy. However, it is also considered appropriate this is identified as an opportunity in the SWOT.</i></p> <p>Noted. This is not something that can be influenced by the City Plan. However, the Council continues to work with the County Council, Network Rail and other organisations on matters such as these.</p>
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City Centre sites

	Site / Issue	Representation	Response
General comments	Potential site allocations	More evidence will be required to demonstrate the impact of the proposed sites on the Strategic Road Network. This should be undertaken as part of the plan-making process. All sites will be required to provide safe and suitable access for all users and mitigate	Noted. This evidence will be provided as part of the emerging City Plan process.
WN1: Land fronting St Oswald's Road		No comments.	No comment.
WN2: Greater Blackfriars, incorporating The Fleece Hotel, Surface Car Park East, Surface Car Park West, County Council/The Quay, Gloucester Prison	<p>Support for the continued allocation.</p> <p>Protect viability and vitality of City Centre</p> <p>Concern over phasing.</p> <p>Concern over flooding</p>	<p>Strong support for the continued allocation of the Greater Blackfriars area. Mixed-use allocation to include a range of main town centre uses.</p> <p>Important that the development of this site does not undermine the vitality and viability of the Primary Shopping Area – complement rather than compete.</p> <p>Concern expressed regarding the phasing of the site as different elements will coming forward for development at different times to each other.</p> <p>Concern regarding location of site within the floodplain. The flood defences of The Quay (not recognised by the Environment Agency as formal defences) are at the previously predicted level of 1/100 year flood and need to be raised to the currently predicted level.</p>	<p>Support noted.</p> <p>Noted.</p> <p>Noted. This will be addressed through the emerging site allocation policy for Greater Blackfriars.</p> <p>Noted. This will be investigated and addressed through the emerging site allocation policy for Greater Blackfriars.</p>

WN3: 104 Northgate Street	Do not allocate	Suggest this site should not be allocated – doubts over deliverability and likely to be unviable.	The site has been identified as deliverable within the plan period through the Strategic Assessment of Land Availability (SALA).
WN4: King's Quarter / Bus Station and Market Parade	Support commitment to site. Mix of uses	Strong support for the Council's commitment to King's Quarter. Maintain allocation for retail-led regeneration. Suggest reference to the bus station should be amended to read, 'The redevelopment of the King's Square and bus station area would lead to the creation of a significant amount of new retail floorspace and other town centre uses that would have a positive impact on the vitality and viability of the City Centre. It would also, amongst other positive effects, lead to the creation of a modern bus station facility and the regeneration of a significant brownfield site in the heart of the City Centre.' Suggestion that other uses should be considered, for example relocation of Gloucester library, a new Tourist Information Centre, theatre, residential.	Support noted. Noted. This is the same as the existing wording. Noted. The King's Quarter site area has been identified as a retail-led regeneration area, incorporating a range of uses appropriate to its City Centre location. The exact uses provided within a scheme will depend upon commercial viability.
WN5: Car Parks, Hampden Way		No comments	No comment.
WN6: Gloucester Docks, incorporating	Support Make more of Docks/Quays as a	General support for proposed uses.	Noted.

<p>Land adjacent to Dry Dock, West Quay, Land adjacent to Llanthony Warehouse, Southgate Moorings</p>	<p>leisure/heritage destination Southgate Moorings</p>	<p>Important that the development of this site does not undermine the vitality and viability of the Primary Shopping Area – complement rather than compete.</p> <p>Make more of the Docks / Quays as an evening / leisure / dining destination and the waterside location / heritage / water-based industries.</p> <p>Suggest deal with Southgate Moorings as a separate development opportunity.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Given the relationship between the different sites in terms of location and constraints it is considered appropriate they are addressed on a comprehensive basis.</p>
<p>WN7: Land at corner of Southgate Street/Trier Way</p>		<p>No comments.</p>	<p>No comment</p>

Kingsholm and Wotton

Site	Site / Issue	Representation	Response
<p>KW1: Civil Service Sports Club</p>	<p>Evidence Base- Playing Pitch Strategy Transport Sand and Gravel</p>	<p>Both support and objection to the proposed allocation of this site. The developer supports on the basis the site is considered suitable for residential development, whereas Sport England and Active Gloucestershire object on the basis that it would have a detrimental effect on sport and physical activity in the City.</p> <p>Suggestion that allocation should be more flexible to allow for a wider range of sports uses.</p> <p>Evidence will be required to support the proposed allocation from a highways perspective given development has the potential to generate a significant number of trips.</p> <p>Assessment of the extent and economic viability of potential sand and gravel resources required.</p>	<p>Noted. The Council is in the process of preparing a Playing Pitch Strategy that will inform the position taken in City Plan in relation to this site.</p> <p>See above comment.</p> <p>Noted. This evidence will be provided as part of the emerging City Plan process.</p> <p>Noted. This issue will be discussed further with the County Council.</p>
<p>KW2: Hare Land North Car Park</p>		<p>No comments.</p>	<p>No comment.</p>

KW3: Industrial Units, Alvin Street	Gloucestershire Archives Sand and Gravel Resource	Consideration must be given to the impact of any proposals in the adjacent Gloucestershire Archives facility. Assessment of the extent and economic viability of potential sand and gravel resources required.	Noted. Noted.
KW4: 67 – 69 London Road		No comments.	No comment.
KW5: Wessex House		No comments.	No comment.
KW6: Former Telecom House site	Use of Site Sand and Gravel Resource	Support for allocation. Consideration should be given to the development of this site for use for long-stay car parking for the adjacent train station. Consideration should also be given to the creation of access directly onto Platform 4 to improve linkages with the wider area. Assessment of the extent and economic viability of potential sand and gravel resources required.	Noted. Noted. This issue will be discussed further with the County Council.
KW7: Warehouse GWR	Plan Evidence	Evidence will be required to support the proposed allocation from a highways perspective given development has the potential to generate a significant number of trips.	Noted. This evidence will be provided as part of the emerging City Plan process.
KW8: Great Western Road	Plan Policies - Level Crossing	Support allocation.	Noted.

sidings		<p>Consideration needs to be given to safety at level crossings – the impact from a development can result in a significant increase in vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.</p> <p>Suggest that the potential impacts from a development that affect Network Rail's level crossings is specifically addressed through planning policy as there have been instances where Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing.</p>	<p><i>Noted. This issue will be considered at the policy drafting stage.</i></p>
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Matson and Robinswood

Site	Site / Issue	Representation	Response
<p>MR1: Land at Corncroft Lane</p>	<p>City Plan Evidence JCS strategic allocation</p>	<p>Mix of responses supporting and objecting to the allocation of this greenfield site.</p> <p>Concern that any impacts of the proposal are thoroughly considered, including impact on Strategic Road Network, local accident hotspots, biodiversity and Key Wildlife sites.</p> <p>Suggestion that the site should be considered through the Joint Core Strategy given its relationship with possible strategic allocations.</p>	<p>Noted.</p> <p>Noted. This evidence will be provided as part of the emerging City Plan process.</p> <p>Given the size and indicative numbers in the SALA, it is not considered appropriate that this site is considered through the Joint Core Strategy.</p>
<p>MR2: Winnycroft Farm</p>	<p>City Plan Evidence JCS strategic allocation</p>	<p>Mix of responses supporting and objecting to the allocation of this greenfield site.</p> <p>Concern that any impacts of the proposal are thoroughly considered, including impact on Strategic Road Network, local accident hotspots, biodiversity and Key Wildlife sites.</p> <p>Suggestion that the site should be considered through the Joint Core Strategy given its relationship with possible strategic allocations.</p>	<p>Noted.</p> <p>Noted. This evidence will be provided as part of the emerging City Plan process.</p> <p>Given the size and indicative numbers in the SALA, it is not considered appropriate that this site is considered through the Joint Core Strategy.</p>

Abbey

	Issue	Representation	Response
A1 – Land adjacent to Abbeydale District Centre	Wildlife and biodiversity	This area is overgrown and an existing refuge for wildlife	Part of this site lies within flood zones 2/3 Subject to planning permission 15/0062/MOD/ 12/00868/MOD for variation of Section 52 Legal Agreement under planning permission 10727/01/OUT to remove the restriction that allocates the site for a library/police station and use of land for community purposes. The application was approved with a covenant that the site be gifted to community uses.
	Parking for the Hadwen Medical Centre	Discussion is ongoing with regard to parking for the Hadwen Medical Centre. Parking on the road outside the surgery is not safe with regard to large vehicle access to Morrisons.	Noted.
A2 - Land the Wheatridge	General lack of POS in the area	<p>The Abbey area already has a lack of open space as identified in the Council's own documents, this is one of the last open spaces that is peaceful and tranquil and is much appreciated by the local community.</p> <p>The sites should be retained for open space and children's play.</p> <p>The area is well used for walking, dog exercising and wild fruit picking. The area also has a bridle way running through it.</p> <p>The site could be opened up as a Farm Park which local residents could be involved in running.</p> <p>This informal open space provides opportunities for the community to meet socially.</p>	<p>The site is being promoted by the County Council as a development opportunity which is surplus to their requirements.</p> <p>This area is not formally adopted open space. It is private land owned by the County Council that is accessed informally by the local community.</p> <p>Development at the site could ensure some open space is retained and adopted by the City Council for retention in perpetuity in consultation with the local community.</p>

<p>A2 - Land the Wheatridge</p>	<p>Wildlife and biodiversity</p>	<p>The site provides a nature corridor for foxes and small mammals & is a hunting ground for birds of prey.</p> <p>Other species sited include badgers, hedgehogs, voles, field mice, red legged partridge, pheasants, goldfinches, bees, bats, newts and squirrels.</p> <p>Use for housing would lose habitat for urban wildlife.</p> <p>There are natural hedgerows and an abundance of flowers and wild fruit and elderflower bushes at the site.</p> <p>The site should be retained and developed/improved as a wildlife haven. The Woodland Trust could be involved to plant up the area. A wildflower meadow could be created.</p>	<p>The independently prepared biodiversity evidence base for the City Plan will assess the importance of the site for biodiversity purposes.</p>
<p>A2 - Land the Wheatridge</p>	<p>Traffic congestion</p>	<p>The Wheatridge East is the main thoroughfare to Upton –St –Leonards and can be very congested, any further development off this road will make matters even worse.</p> <p>People park on Wheatridge East for the Hadwen Medical practice on the Wheatway.</p> <p>Development of this site will result in more road accidents. The junction of Wheatridge East and Wheatway is already a difficult junction.</p>	<p>Noted. The City Plan transport evidence will identify any mitigation required in order to accommodate development at the site.</p>
<p>A2 - Land the Wheatridge</p>	<p>Community Facilities</p>	<p>The local pub is soon to be replaced by a service station and the existing doctors surgery is oversubscribed.</p> <p>Additional new housing at Brockworth has placed pressure on the existing community facilities at Abbeydale such that the area cannot take any more new housing development.</p>	<p>Strategic healthcare planning in the City is provided for by Gloucester Clinical Commissioning Group who will be consulted on future drafts of the City Plan.</p> <p>City Plan growth will need to be supported by the necessary infrastructure.</p>

A2 - Land the Wheatridge	Type of proposed development	<p>Three storey development would be inappropriate in this location as it would have an adverse impact on existing residents amenity.</p> <p>Any development should be limited to a small number of executive homes with as much of the field retained as possible.</p>	<p>Any new development will need to make the best use of land in accordance with JCS and City Plan policy however normal development control criteria would apply with regard to the protection of existing residential amenity.</p>
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Barnwood

	Issue	Representation	Response
<p>B1 – Land north of Walls</p>	<p>Potential impact on Strategic Road Network</p>	<p>The allocation has the potential to generate significant numbers of trips. Further evidence is required on the impact of this development on the Strategic Road Network, particularly roundabouts on the A40(T) to the north of the City and mitigation that maybe required. Such information should be incorporated into subsequent stages of City Plan preparation.</p> <p>Objection to the site being identified solely for employment use but should be for a mixed use of non-food retail/leisure and associated uses.</p> <p>The site should be bought forward in accordance with with paragraphs 22, 154 & 173-175 of the NPPF. Land should not be safeguarded for employment purposes if proposals for sites are not realistic. Despite marketing no responses have been received indicating interest in either developing or occupying the site for employment purposes. The only interest has come from car showrooms, food and drink operators, bulky goods retailers, a food retailer and a cash & carry/discount warehouse.</p> <p>A higher value use on the site is required in order to make an employment scheme viable owing to the costs of the highway improvements required & the cost of relocating the Unilever car park.</p>	<p>Transport evidence- which will include modeling of proposed City Plan sites – on the updated 2013 County Highways Saturn model – will inform part of the City Plan evidence base going forward and will address the issues raised by this representation.</p> <p>Highways Agency (now Highways England) and Highway Authority will be party to preparation of the tender brief for the Transport Assessment.</p> <p>An outline planning application for ‘B’ uses at the site is currently under consideration by the City Council (March 2015) demonstrating that the use of the site for employment purposes is deliverable.</p>

	Presence of watercourses	Watercourses are not a threat in themselves – they can be an important natural resource. This matter requires a more explicit response – that these particular watercourses can at times pose a flooding threat to the built environment.	<i>Amend references to watercourses at this site.</i>
B2 – Fire Station Eastern Avenue	Update on site	Gloucestershire Constabulary acquired the freehold interest in this site in October 2012 and plans to redevelop it to provide a new police station to service Gloucester City Centre and replace the existing Bearland Police Station which will be closed once the new facility at Eastern Avenue is operative. The new police station at Eastern Avenue will be the base for community policing and response for Gloucester. The existing custody function at Bearland will be relocated to a new facility at Waterwells so there will not be any custody function at Eastern Avenue.	The new custody suite at Waterwells is now operational. The City Council is working closely with the police to ensure a retained presence in the City Centre and to ensure an end use for the former fire station site that will retain the site in an employment use.
B3 – Royal Mail Distribution Centre Eastern Avenue	Greater flexibility of use	<p>The City Council is encouraged to build in greater flexibility for employment generating non B class uses to be developed on employment sites, in line with the “whole economy” approach advocated in para 7.11 of the NLP March 2011 report and paragraphs 21 & 22 of NPPF 2012.</p> <p>The emphasis should be on maximizing the use of brown field land within the existing urban area before considering the release of green field land.</p> <p>While it is appropriate to apply the sequential and impact tests in considering proposals for new retail development outside the Primary Shopping Area occupational demand from retailers may not always be in the City Centre and the City may therefore lose valuable investment that would make an exceptional contribution to the image and regeneration of the City if it does not apply the city centre first principle in a more flexible manner.</p> <p>The site is known as <i>Gloucester Mail Centre</i> not</p>	<p>Noted</p> <p>Noted.</p> <p>Noted. The sequential test is flexible in that it allows applicants to demonstrate special circumstances where particular form of retail development would not be applicable in a City/Town Centre locations.</p>

		<p><i>Royal Mail Distribution Centre.</i></p> <p>Correct site area is 2.25ha.</p> <p>Royal Mail consider the character of the area should be described as <i>mixed use</i> not <i>employment</i>.</p> <p>Royal mail request reference to possible contamination at the site be deleted.</p> <p>Reference to capacity of Walls and C&G roundabouts should be deleted.</p> <p>The existing access to the north bound carriageway of a the A38 is a constraint and should be added.</p> <p>Proposed use should read, '<i>Existing employment land to be retained for employment purposes. Uses that make an exceptional contribution to the image and regeneration of Gloucester will also be considered</i>'.</p> <p>Site should be described as, '<i>Prominent 'gateway' location with good communication links, offering a high quality development opportunity</i>'.</p>	<p><i>Noted – amend as suggested</i></p> <p><i>Noted – amend as suggested</i></p> <p>Eastern Avenue currently provides and will continue to provide an employment focus for the City. All brown field sites may be subject to possible contamination.</p> <p>City Plan Transport evidence will identify existing junctions currently operating at capacity.</p> <p>City Plan Transport evidence will identify site specific constraints and mitigation.</p> <p>Site will continue to be considered for employment purposes in City Plan.</p> <p><i>Agree amend however state it is an employment related development opportunity.</i></p>
<p>Barnwood Point sites</p>	<p>Other representations with regard to Barnwood</p>	<p>Request that sites be considered for allocation through the City Plan process</p>	<p>Potential City Plan sites have been ascertained through the SALA process – these sites have not been submitted to the SALA – however they have been picked up going forward in response to the 2013 City Plan consultation (March 2015).</p>

Barton and Tredworth

Site	Issue	Representation	Response
	Minerals and Waste	The British Geological Survey resources map suggests sand and gravel resources underlying the site (BT1 and others in other wards). The extent and economic viability of these resources should be assessed. Care consideration of any economic resources should be made in terms of the potential for prior extraction in the development proposals.	Noted. This issue will be discussed further with the County Council.
City Farm	Make more of the City Farm	More could be made of the City Farm area to attract visitors to Barton and Tredworth	The City Farm is leased to the Friendship Café community group who successfully run the farm and offer a range of activities and experiences for local people. This is outside the scope of City Plan.

Elmbridge

Site	Issue	Representation	Response
Site E2 Helipebs	<p>Suitability of site E2 Helipebs</p> <p>City wide issue</p>	<p>This site is identified as an occupied and functioning industrial area. There are also a number of identified constraints, including potential contamination issues. The cumulative impact of these considerations has a significant limiting effect on the potential for redevelopment. In particular, the fact that the site is a functioning industrial area implies that there are current occupiers who are likely to have varying lease agreements and structures. Complex sites, such as this, should not be allocated for development unless there is clear evidence that the site will become available with the plan period.</p> <p>City needs to allocate prime residential locations capable of delivering larger family housing, and not place undue reliance on the delivery of apartment based developments to meet the housing requirement.</p>	<p>The site was submitted to the council as part of the SHLAA process indicating its availability. The site has been thoroughly assessed by officers and is considered suitable, available and achievable within the plan period.</p> <p>The city council is committed to delivering housing to meet its identified housing need. The redevelopment of suitable sites plays an important role in delivering a mix of housing types including family housing.</p>
Site E2 Helipebs	Impact on highway network	Site E2 Development at any of the listed sites will be required to provide safe and suitable access for all users and mitigate any severe impact the development causes in line with the NPPF. In particular the site causes concerns over access to the highway network.	The potential impact on the highway network will be assessed through further evidence gathering as part of the City Plan process. Any planning applications submitted on the site will be required to submit evidence to demonstrate the impact on the highway network, and details of any mitigation as appropriate.

Longlevens

Site	Issue	Representation	Response
L1 Bishops College Site	Relationship between JCS allocations and City Plan allocations	The Plan needs to make linkages between allocations on the edge of the City and strategic allocations in the JCS eg L1 and G1 and G9.	Comment noted
L1 Bishops College Site	Transport	The Highways Agency (now Highways England) supports the site's location close to the City Centre, however, further evidence needs to be provided to establish the traffic impact of the proposal on the SRN, particularly the roundabouts on the A40(T) to the north of the City	Further evidence is being progressed to meet the requirements of the PPG in partnership with the Highway Authority and the Highways Agency (now Highways England).
L1 Bishops College Site L2 – Land off Leven Close.	Protection of Playing Fields	Ensure the Playing Pitch Strategy is kept up to date and meets the requirements of the NPPF. Object to the loss of playing fields and pitches and therefore seek the removal of the site allocation. The site does not meet the exceptions test.	An updated Playing Pitch Strategy is being prepared and will inform the City Plan and its policy approach in relation to playing fields.
L1 Bishops College Site		Seek protection of the site for educational purposes, particularly given the expected development to the north of the area. Agree with the SHLAA's conclusions that potential for residential development is limited. Concern over access into the site and the narrowness of Estcourt Road with no alternative available.	The site is surplus to the operational requirements of the County Council and has been approved for disposal. The site is being considered for residential development. A satisfactory access will need to be provided to the satisfaction of the Highways Authority.
L1 Bishops College Site L2 – Land off Leven Close.	Sand and Gravel Resources	The British Geological Survey resource maps suggest sand and gravel resources underlying the sites. The extent and economic viability of these resources should be assessed. Careful consideration of any economic resources should be made in terms of the potential for prior extraction in the development proposals. Any major planning application (over 1ha) that is submitted for any of the sites will require a waste minimisation statement as set out within the GCC Waste Minimisation SPD.	<i>Noted. This issue will be discussed further with the County Council.</i>

Quedgeley Severn Vale

Site	Issue	Representation	Response
QSV1 – Clearwater Drive	Nature Conservation	The approach (one of a number considered by GCC in the past) of partial development of QSV1 that ensures nature conservation assets are managed and enhanced long-term can be accepted from a biodiversity perspective on this County Council owned site. It should be mentioned in the table that this site is designated as a Key Wildlife Site by the Gloucestershire Wildlife Sites Partnership (i.e. The Causeway, Quedgeley KWS). Further details on this site's value can be obtained from the Gloucestershire Centre for Environmental Records (www.gcer.co.uk/) and this together with an ecological survey and assessment will be needed to inform any detailed development proposals that might come forward for QSV1 at the planning application stage.	An independently prepared biodiversity evidence base will inform City plan preparation.
QF1 – Land east of Waterwells	Proposed employment allocation	<p>The infrastructure required in order to bring the proposed employment allocation forward affects the financial viability of the scheme. Therefore the Council is urged to allocated 20 acres (approx) for residential purposes to enhance the area. The area is likely to become more sustainable with the completion of the 'Kingsway' and 'Hunts Grove' developments – additional residential development would be the most viable use in this area.</p> <p>Support for Option 3.</p> <p>Lynton Fields is available for commercial/residential development purposes.</p> <p>The Highways Agency (now Highways England) is not satisfied that this is the most sustainable location in transport terms for further intensification of employment development, especially in the absence of any certainty relating to the provision of a rail station or frequent bus services. Before it can support this allocation the Agency will require evidence to be submitted which explains;</p> <ul style="list-style-type: none"> - The transport impact of this allocation and in particular the additional traffic which would use Junction 12 of the M5 and; - The mitigation required to accompany the development. 	<p><i>Comments noted.</i></p> <p><i>Land East of Waterwells forms the last phase of the successful strategic Waterwells employment allocation. An element of residential is considered appropriate to deliver road infrastructure improvements to open up the remaining employment land and address the concerns of those living in the area. A comprehensive approach is required to delivering the site.</i></p> <p><i>Further transport evidence will be gathered to inform site allocations within the Plan.</i></p>

		<p>The proposed employment site is not easily or conveniently accessed from the Strategic Road Network and is relatively isolated from the rest of the business park.</p> <p>It would seem more appropriate for the site to be used for residential development will all necessary community services and facilities to serve future residents currently being provided and becoming available in the area.</p>	
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Tuffley

Site	Issue	Representation	Response
Land South of Grange Road (T1)	Loss of landscape value	<p>The last County Structure Plan (2000) depicted this land as falling into the two important landscape policies supported by the Government and the then Countryside Commission.</p> <p>T1 borders the A4173 from the Gloucester city boundary to Stroud and is considered to be the best (landscape) road entry into the City and to and from Stroud. The latter combined with Gloucester city Country Park Robinswood Hill (an outlier of the Cotswolds) the Cotswolds scarp itself, the Severn Vale, the winding River Severn, Painswick Village, May Hill, Forest of Dean, Harsefield Hill the Malvern Hills has always given the driver and passengers, in fantastic detail, one of the finest pleasure routes in the UK.</p>	<p>The City Council commissioned a Landscape Analysis Report which highlights that the southern part of the site is not suitable for development due to landscape constraints. The report also suggests mitigation to reduce any visual impact on the surrounding landscape should the northern part of the site come forward for development.</p>
Land South of Grange Road (T1)	Flooding	<p>The development of T1 will create hard surfaces. The fields already contribute flooding beyond Grange Road.</p>	<p>As part of the City Plan further work will be undertaken to assess the flood risk and any implications that may or may not have on the development potential of this and other sites.</p> <p>Any planning application for the development of the site would need to demonstrate how surface water will be managed. This work would need to satisfy the requirements of the Environment Agency and Severn Trent.</p>

Land South of Grange Road (T1)	Highways	Already congested by commuters by car and by public transport including schools, homes for the elderly and the like.	As part of the City Plan further work will be undertaken to assess the impacts on highways infrastructure. This work will form part of the evidence base and will inform the next stage of the plan.
Land South of Grange Road (T1)	Loss of agricultural land and rural character	The fields in T1 are normally full of cattle and sheep on good agricultural land with public footways styles and are linked to a circular walk all around the City of Gloucester linking it with its best outdoor features and landscape including Robinswood Hill and the River. The countryside here is truly rural and should remain as such. It has become a major asset for the City tourists and economy.	<p>The Landscape Analysis Report November 2013 assessed the quality of the landscape in the area. The findings of this work suggest that development to the south of the site would not be suitable and development to the north would need mitigation measures implemented to reduce any negative impacts on the surrounding landscape.</p> <p>The City Council must consider all sites that have a potential for residential, regardless of their previous use, given the need for housing that is presenting.</p>
	Retail	Develop small shopping areas for the older generation – but maintain them. Windsor Drive (local centre) is an absolute disgrace.	Local centres are an important element of sustainable communities. The City Plan will seek to protect local centres and support their regeneration should appropriate planning applications come forward.
	Concern over loss of greenfield	Stop the development of green fields at the end of Grange Road	The housing requirements for the City are such that not all of the housing can be accommodated on brown field development.

Land South of Grange Road (T1)	Site T1 should be considered through the Joint Core Strategy (JCS)	It is noted that some sites adjacent or close to the city boundary have a relationship with possible strategic allocations. In particular sites MR1, MR2 and T1 all fall within JCS broad location site G6 (the remainder of which is predominantly located within Stroud local authority area). These sites should be considered through the JCS process, particularly where their rural boundaries are not defined by a hard feature such as the M5 motorway as is the case at the southern boundary of MR2 and at the long south-east boundary of T1.	The districts within the JCS have signed up to a memorandum of understanding and have agreed to pursue a number of strategic sites. This site is not considered a strategic site as part of the JCS. The districts have agreed that the most sustainable direction for growth should be to the north of Gloucester to better link, and take advantage of services and employment opportunities in the existing centre.
Land South of Grange Road (T1)	Strategic Highways	Site T1 – These (along with MR1 and MR2) are the largest potential allocations in the City Plan (in terms of hectares) and they are all on greenfield (and in fact Green Belt) land on the southern edge of the city. Each of the sites has the potential to give rise to a significant number of trips. However, it is not clear at this stage how, or if, trip generation from them will affect the SRN as these sites are some distance from the A40(T) or M5 motorway junctions by existing roads. The local authority will need to provide evidence which explains the traffic impact of these sites and the mitigation which may be required at them. This information should then be incorporated into subsequent stages of the City Plan production.	The comment is inaccurate in that the site is not located within green belt. As part of the City Plan further work will be undertaken to assess the impacts on highways infrastructure. This work will form part of the evidence base and will inform the next stage of the plan
Land South of Grange Road (T1)	Promotion of site T1 for development	Site T1 represents a highly appropriate and sustainable location for future development to meet the needs of the City. For the reasons set out in these representations we consider the land south of Grange Road is a suitable, sustainable and deliverable site. There are no constraints precluding the site from coming forward for much needed family housing in the early years of the City Plan. – An illustrative masterplan for the development of 200 homes is included in the plan.	Noted. The City Council will undertake further evidence gathering as part of the development of the City Plan. This work may or may not highlight further development constraints.

<p>Land South of Grange Road (T1)</p>	<p>Opposed to development of T1</p>	<p>Access limited - Grange Road too narrow and Stroud Road already busy Too many houses in a small area Flooding likely Shortage of Facilities Loss of agricultural land – needed more as population expands</p>	<p>As part of the City Plan further work will be undertaken to assess the impacts on highways infrastructure. This work will form part of the evidence base and will inform the next stage of the plan</p> <p>As part of the City Plan further work will be undertaken to assess the flood risk and any implications that may or may not have on the development potential of this and other sites.</p> <p>Any planning application for the development of the site would need to demonstrate how surface water will be managed. This work would need to satisfy the requirements of the Environment Agency and Severn Trent.</p> <p>The City Council must consider all sites that have a potential for residential, regardless of their previous use, given the need for housing that is presenting.</p>
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Westgate South

Site	Issue	Representation	Response
City Plan Consultation document	Object to wording in introduction to Hempsted	<p>Object to the last sentence of the first paragraph on page 84 of the CPCD which states that Hempsted now forms part of the wider built up area of the City. Seeks this wording to be replaced by wording from the 2007 Conservation Area Appraisal to be included as follows..'<i>Despite this, Hempsted preserves its separate identity as a village on the south western side of the City.</i>'</p> <p>The third paragraph should state that <i>"crucial to that environment are the agricultural fields to the east and west of Hempsted Lane which preserve the sense of separation from Gloucester and maintain the green and rural character of the village. They are also critically important to the setting of the conservation area."</i></p>	<p>Hempsted forms part of the administrative area of the City of Gloucester.</p> <p>These comments are too site specific to be included within a general SWOT for Hempsted. The SWOT already refers to the areas strengths as its setting within the landscape and its conservation area and character of the older part of the village.</p>
	Object to SWOT wording in Ward analysis for Hempsted	<p>Object to the analysis of the ward on page 85 of the CPCD. The environmental strengths are underplayed. The items under strengths should be deleted and be replaced with the following :</p> <p><i>The older part of the village has a rural character and identity which provides environmental benefits for the whole Hempsted area.</i></p> <p><i>Fields to the east and west of Hempsted Lane, which are still in agricultural use penetrate the built up area and are essential in preserving the rural character and identity of Hempsted and critically important to the setting of the conservation area.</i></p> <p><i>Fields to the east and west of Hempsted Lane contain features of historic and archaeological importance, including Lady's Well, various earth works, ridge and furrow and remnants of an old orchard. The Council's own interpretation board, along the footpath link from Hempsted Lane to The Gallops, highlights the importance of these and other features.</i></p> <p>Under threats the wording should be revised to say:</p> <p><i>Loss of village character through large scale development proposals Any development proposals in locations which are critically important to</i></p>	<p>These comments are too site specific to be included within a general SWOT for Hempsted. The SWOT already refers to the areas strengths as its setting within the landscape and its conservation area and character of the older part of the village plus states threats relate to loss of 'village' character through large scale development.</p> <p>Design policies will be included within the plan that cover some of the issues identified relating to character and views.</p>

		<p><i>the setting of the conservation area</i></p> <p><i>Any development proposals which would not –(i) help to preserve the sense of separation of the older part of Hempsted from Gloucester, (ii) maintain the green and rural character of the village, and (iii) protect important views.</i></p>	
Hempsted Village	General comments	<p>Hempsted is a village despite recent growth.</p> <p>Support the Council's analysis of the area</p> <p>Damage to community cohesion and loss of community.</p>	Comments noted.
	Sustainable Development	Further development would not be sustainable.	A Sustainability Appraisal is being prepared alongside the City plan which will inform its preparation and ensure delivery of a sustainable development plan.
	Infrastructure	<p>lack of infrastructure and services which would worsen with further development.</p> <p>capacity of school/sewerage system,</p>	Future development will need to ensure it meets necessary infrastructure requirements. An Infrastructure Development Plan will accompany the City Plan.
	Open Space	<p>Concern over loss of green space/amenity space,</p> <p>Protect open space and develop only brownfield sites and reuse empty homes</p>	Comment noted. An open space study and an updated Playing Pitch Strategy are being prepared which will help inform preparation of the City Plan.

	Traffic congestion	Road congestion. Hempsted Lane cannot absorb any increase in car trips, All roads in Hempsted will require widening if sites are developed. Congestion on the local road network especially around school times means there is no access for emergency vehicles.	A Transport Assessment- which will include modeling of proposed City Plan sites – on the updated 2013 County Highways Saturn model – will comprise part of the City Plan evidence base going forward and will address the issues raised by this representation.
	Natural Environment	impact on landscape and the natural environment, loss of views, Greenfield sites within and around the village form a protective green belt around the village.	The independently prepared biodiversity/landscape evidence base for the City Plan will assess the importance of identified sites for biodiversity purposes.
	Heritage	Development would change the character of the conservation area, and lead to much denser development.	The City Plan will seek to preserve the character of the conservation area whilst needing to meet identified development needs of the city.
WS9 – 26 Hempsted Lane	Support development of the site	Support development of brownfield site (for employment use)	Support noted
WS10 – Former Oil Storage Depot	Support development of the site	Support the limited development of this brownfield site. Needs to be proportionate, take full account of the environment and make proper and timely contributions to infrastructure. The development must not result in over development, open up Honeythorn Close to pedestrian/vehicular traffic, result in adverse impact of proposed developments on Hempsted Lane, Meet resulting infrastructure needs as a result of the development. The development must not impinge on views from the west	Site has outline planning permission granted in February 2015

WS10 – Former Oil Depot	Object to development	Lack of infrastructure for education and drainage make this an unacceptable development site. Separate from the village	Site has outline planning permission granted in February 2015
WS11 – South West Bypass	Support		Noted
WS11 – South West Bypass	Object to development of the site	Linear development which would block the view of the green space west of the bypass and create an overdeveloped feel. Separate from the village	Site supported by the SELLA panel as appropriate for employment use.
WS12 – Land East of Hempsted Lane	Object to development of the site	<p>Greenfield Site</p> <p>Development would destroy the rural village character which makes Hempsted an attractive place to live.</p> <p>Housing density proposed is double that of those adjacent to them within the village and are out of character,</p> <p>Land under agriculture since the middle ages.</p> <p>Forms an important separation between the new development along the bypass and the old village of Hempsted and is essential to maintaining the green and rural character of Hempsted in visual and community terms plus contribute to the setting and character of the conservation area and archaeological importance for the area.</p> <p>Sites protected from development on environmental grounds – Landscape Conservation Area/Prime Biodiversity Area</p> <p>Dispute Council's open space study which states that there is a shortfall in open space provision in Hempsted</p> <p>Need to provide a quality environment for the residents of Gloucester and not develop valuable sites to offset use of Green Belt elsewhere.</p> <p>Outgrown hedge obscures view of Chosen Hill, Detrimental impact on the protected environment.</p> <p>Lack of infrastructure for education and foul and surface water drainage make this an unacceptable development site.</p>	WS12 now has Outline planning permission for residential development granted in December 2014

		<p>Hempsted Lane is unable to cope with additional traffic that would be generated from the development of this site.</p> <p>Development of these sites would require improvements to highway which would impact on the local rural environment</p> <p>The sites position in the centre of Hempsted provides an outstanding presence on the whole area.</p> <p>The fields are integral part of the rural character of Hempsted, they form part of the open countryside, protect the archaeological importance for the area and medieval ridge and furrow field system and traditional orchard, are critically important to the setting of the Conservation Area, prevent the coalescence of the main urban area with the older historic part of Hempsted Village, protects important views across the site to Robinswood Hill and the Cotswolds, should be allocated as part of the Green Infrastructure system securing long term green areas.</p> <p>SHLAA assessment does not meet guidance requirements</p> <p>Issues with SA process</p> <p>Council ignored consultation responses which did not support development of the site</p> <p>Concerns over impact on traffic movements into and out of the village plus associated parking issues.</p> <p>Seek updated polices to protect fields.</p> <p>Designate site as a Local Green Space.</p>	
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<p>WS12 – Land East of Hempsted Lane</p>	<p>Support development of the site for residential /public open space</p>	<p>Support limited development with open space gains and improvements of access with the wider Hempsted area. Manor Farm and the house opposite retain their landmark nature. Support development of site for 50 – 60 houses and around 1.5ha of public open space.</p> <p>Prime biodiversity Area (PBA)– site would not impact on designated sites owing to their spatial relationship and lack of connectivity with the site. Through development parts of the site eg the remnant orchard could be restored and improved.</p> <p>Landscape Sensitivity – land has a rural use but in an urban context. Landscape quality is low with potential for enhancement through development</p> <p>Landscape Conservation Area policy (LCA1) is a non statutory policy and the inclusion of the site within the policy was recommended against by an independent Inspector.</p> <p>There will be no effect on the setting of designated assets. The setting of the historic part of the village will be maintained by retaining open land on this part of the site.</p> <p>The Conservation Area has not been extended to include land east of Hempsted Lane.</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014</p>
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<p>WS13 Land at Rectory Lane</p>	<p>Object to development of the site</p>	<p>Greenfield site,</p> <p>Housing density proposed is double that of those adjacent to them within the village and are out of character,</p> <p>Development would compromise the natural and undeveloped views from the valley floor to the west of the village, river basin and city approach</p> <p>Protection of the landscape character/urban fringe landscapes views should be preserved for their amenity value on the local network of rural paths</p> <p>Unsuitable development site due to access, size, position and instability of land resulting from development of Chartwell Close. Development would be imposing on property which sits below this site and impact on skyline when viewed from west. Also lack of infrastructure for education and drainage constraints apply. This flat area is built up of rubble which sits atop of the clay slope and was put there at the time Chartwell was built. Access problematic, illegal school parking a problem. Development here would have an adverse impact on the character of the village.</p> <p>There are likely biodiversity assets on the site which are in close proximity to the strategic green infrastructure of the River Severn and Wash Lands.</p> <p>Sites have poor access to public transport, services and facilities and there is a lack of capacity in the foul and surface drainage infrastructure and insufficient primary school capacity in the area.</p> <p>Concerns over impact on traffic movements into and out of the village plus associated parking issues.</p> <p>Development of these sites would require improvements to highway which would impact on the local rural environment</p>	<p>Comments noted</p> <p>Further evidence will be undertaken to inform potential city plan allocations.</p> <p>The site may be too small for allocation within the Plan.</p>
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<p>WS14 Land at Rea Lane</p>	<p>Object to development of the site</p>	<p>Greenfield site</p> <p>Housing density proposed is double that of those adjacent to them within the village and are out of character,</p> <p>Development would compromise the natural and undeveloped views from the valley floor to the west of the village, river basin and city approach</p> <p>Protection of the landscape character/urban fringe landscapes</p> <p>Views should be preserved for their amenity value.</p> <p>on the local network of rural paths</p> <p>Unsuitable development site due to access on Rea Lane, ad hoc development next to Chartwell Close. Also Lack of infrastructure for education and drainage constraints apply</p> <p>Development here would have an adverse impact on the character of the village. There are likely biodiversity assets on the site which are in close proximity to the strategic green infrastructure of the River Severn and Wash Lands.</p> <p>Sites have poor access to public transport, services and facilities and there is a lack of capacity in the foul and surface drainage infrastructure and insufficient primary school capacity in the area. Concerns over impact on traffic movements into and out of the village plus associated parking issues.</p> <p>Development of these sites would require improvements to highway which would impact on the local rural environment</p> <p>The site has biodiversity interest. Disagree with the SHLAA comment that the hedge is species poor. The hedge supports a great deal of fauna and restoring this boundary would be quickly and easily achieved. The southern part of the site forms a new orchard. Buzzards nest in the area and kestrels feed. The western boundary includes mature trees including an oak and possible rare black poplar that need to be protected.</p>	<p>WSP Landscape Analysis of potential development sites 2013: the site is appropriate for development. The sites position is well screened from the flood plain and is bound to the north and east by residential properties.</p> <p>JCS Gloucester Landscape Sensitivity Area – High- Medium sensitivity</p> <p>SELAA – capacity should be reduced owing to the access constraints at this site.</p> <p>Adjacent to strategic GI of Severn and wash lands</p> <p>Archaeological constraints?</p> <p>Further evidence will be undertaken to inform potential city plan allocations.</p>
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Other Sites

Site	Issue	Representation	Response
Rear of cattle market and adjacent to Archdeacon Meadow – possible residential opportunity.	Additional site	possible residential opportunity	Noted. The site has an outline consent for mixed use development as part of the wider St Oswalds development site. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.
<input type="checkbox"/> Former Kwiksave Site, Northgate Street	Additional site	Residential planning application exists but there has been no progress on development.	This site lies within the new Housing Zone where residential development is being encouraged. The site forms part of the SALA and its deliverability will be reviewed on a regular basis. Noted. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.
Baker's Quay site	Additional site	Mixed development opportunity to include residential, hotel etc.	Noted. Bakers Quay already benefits from outline planning permission. Notwithstanding this, consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan
Alney Island	Additional site	The H&G Canal Trust is currently driving the Llanthony hydro project (Green energy) and would be a leading partner in developing the Leadon Valley Green Infrastructure Project. With regard to this latter project Alney Island should be recognised as an integral part of it, and not as a separate entity.	Noted. Alney Island has been and will remain a key piece of strategic Green Infrastructure being progressed through the Joint Core Strategy. This will feed into the City Plan.

Canal	Additional site	Restoration of the Canal will bring significant benefits to the City and in the sustainability of its Plan. These will be in the areas of tourism, recreation, employment, health and wellbeing of residents through walking and cycling along the Canal, the provision of a substantial green corridor for wildlife, and in biodiversity, etc.. Make reference to the Canal under tourism, open spaces, sustainability, etc..	<i>Agree amend Plan to make reference to the Canal as stated.</i>
Land at Whaddon	Additional site	<p>The City Strategy should look beyond the administrative boundary to find the most sustainable and deliverable growth options for the city, and land at Whaddon should be included and assessed in this regard by both the City Council and Stroud District.</p> <p>Overall, constraints within the site are limited and the site is considered suitable and sustainable for development.</p> <p>The site has a strong physical and functional relationship with Gloucester City and represents a logical urban extension opportunity to the existing urban area. The site also has a strong physical functional relationship with wider Gloucestershire JCS administrative area and should be considered as a strategic opportunity for the wider housing market area in this regard.</p> <p>The site's location adjacent to the existing urban area provides good accessibility to Gloucester City's amenities, facilities and employment opportunities including the city centre by sustainable modes of transport.</p> <p>Land at Whaddon also benefits from ease of access to local bus services</p> <p>Land at Whaddon benefits from accessibility to the dedicated network of footpath and cycle routes</p> <p>The site is un-extraordinary in landscape terms</p> <p>A linear belt of floodplain bounds Daniels Brook through the centre of the site and can be easily accommodated within the development/masterplanning for the site.</p>	Site not required. Gloucester City Council is able to meet its needs within its boundaries and within the strategic allocations in the JCS

		<p>there are number of public footpaths within the site which can be accommodated within the development/masterplanning of the site.</p> <p>The evidence base clearly demonstrates that the growth needs of Gloucester City cannot be accommodated within the City boundaries and as such, sites within neighbouring authorities, including Stroud, will need to be allocated for development growth.</p> <p>As confirmed by the SHLAA assessment and by virtue of these representations, land at Whaddon is deliverable</p> <p>The City Plan Strategy Consultation has focused upon sites within its administrative boundary and has not assessed alternative delivery within Stroud District to serve local market needs. As Stroud DC sits outside the Gloucestershire JCS, cross boundary land to the south of Gloucester should be considered within the City Plan as well as the Stroud Local Plan.</p> <p>The suitability and sustainability of land at Whaddon is demonstrated by the City Council's identification of T1 in the City Plan Strategy Consultation. This is the northern proportion of the RSS Whaddon search area which is contained within the city boundary. Cross boundary working with Stroud District has not been undertaken here given that the suggested allocation stops at the City Council boundary.</p> <p>In this regard, land at Whaddon provides a more appropriate and sustainable growth location for Gloucester, which is better related to the City and inward investment than Hunts Grove.</p>	
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Land at Unilever B1	Change use	Support Barnwood as a development opportunity but not its suggested future use for employment only. Seek mixed use allocation including non food/leisure (and associated uses) as well as employment (B1, B2 and B8). The proposed use of the site is contrary to paragraphs 22, 154 and 173 of the NPPF, is not deliverable and not viable due to costs associated with achieving an acceptable access into the site, as well as utilities and car park relocation.	A planning application is being progressed for B uses on the site.
Peel Centre	Accessible out-of-centre location to accommodate new retail floorspace	The Peel Centre and adjacent sites should be prioritised as a very accessible out-of-centre location to accommodate new retail floorspace, as well as the reconfiguration / expansion / refurbishment / improvements as a retail warehouse location and the former Cineworld building. It should also be acknowledged that the Peel Centre has both D2 leisure and A3 restaurant uses.	Noted. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.
Madleaze Industrial Estate	Development opportunity	Madleaze Industrial Estate should be identified as a development opportunity – it is owned by the Peel Group who will be reviewing potential development opportunities in the early stages of the plan period.	Noted. Consideration will be given to the allocation of different sites for different uses as part of the next stage of the City Plan.

Non Site Specific Issues

Issue	Representation	Response
Highways	<p>The Highways Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN). With respect to the city of Gloucester the SRN comprises:</p> <ul style="list-style-type: none"> - The M5 adjacent the city's eastern boundary; and - The A40 close to the city's northern boundary between Elmbridge Court Roundabout and Over Bridge <p>Nearly all of the authority area is within 3 miles of a junction on the SRN. The Highways Agency is a statutory consultee on stages of local plan preparation and it is the Agency's intention to work closely with the City Council at every stage of the City Plan.</p> <p>The City Plan introduction also notes that it is clear that the City will be unable to meet all of its growth needs within its own boundaries and that consequently there is a need for the City Council to work with neighbouring authorities to allocate land outside but adjacent to the city boundary.</p> <p>The Agency is aware that the authority boundary is drawn tightly around the city and that significant housing and employment development has already occurred close to, but outside, of the city boundary.</p> <p>The Agency supports the key components of the draft City Centre Strategy, particularly the 'city centre first' approach towards all proposals for main town centre uses, which has the potential to reduce trip distances, increase the proportion of trips by non-car modes and reduce reliance on the private car.</p> <p>The Agency supports the assessment of proposals for retail development outside the Primary Shopping Area against the key tests set out in the NPPF, in particular the sequential test by which local planning authorities must require applications for main town centre uses to be located in the town centres.</p> <p>The Agency broadly supports policies which seek to increase residential development in the city centre as it offers the potential to provide housing close to facilities and public transport and reduce household reliance on the car.</p>	<p>Comments noted.</p> <p>It is the intention of the City Council to continue to work closely with the Highways Agency now called Highways England.</p> <p>It is noted that further evidence is required and this is being progressed.</p>

	<p>Indicative acceptable numbers of dwellings were or amounts of floorspace anticipated on each proposed allocation were not provided in the ward-by-ward summaries and would have been helpful in facilitating the Agency's analysis of the potential generation.</p> <p>It is not clear at this stage what up-to-date transport evidence supports the City Plan. The Agency must make it clear that, without the benefit of having sight of up to date transport models which predict the impact of different development scenarios on the SRN; the Agent is unable to comment in detail about the acceptability of individual proposed allocations.</p> <p>The Agency will be pleased to work in partnership with the City Council and its neighbouring authorities to identify the appropriate sub-regional transport modelling to support the preparation of the City Plan and ensure it can be found sound by the planning inspector.</p>	
Highways	In particular, the following sites cause concerns over access to the highway network: B1, E2, KW5, KW6, KW7, KW8 (plus anything that puts extra traffic through St Barnabas Roundabout.	Further highways work will be undertaken to assess the likely impacts and potential for mitigation prior to any site allocations.
Public transport	Lack of bus services to St Oswalds or the Quays Shuttle bus required between Quays and City Centre.	Bus services in the City are run by private companies and are not subject to planning controls.
Brownfield Land	<p>Complex sites (brownfield) should not be allocated for development unless there is clear evidence that the site will become available with the plan period.</p> <p>Due to the nature of the environment within the Gloucester City Council administrative area, it comes as no surprise that the majority of potential site allocations within the City Plan are small, urban 'infill' developments. Whilst we do not object to the allocation of such sites where these are considered viable and deliverable, it is important that the Council allocate appropriate sites to meet the range of housing market needs, including sites capable of delivering larger family housing.</p> <p>It is our view that the Council should allocate a mix of sites capable of delivering both apartment based redevelopment schemes and larger sites capable of delivering family accommodation. For the former, all realistically deliverable and viable sites should be allocated however the Council should not rely unduly on such sites to meet the housing needs and demands of the area. In addition to these, the</p>	<p>All sites put forward are assessed thorough the SALA process. This includes assessing whether or not the sites are suitable, available and achievable. Sites that do not meet the criteria will not be put forward as allocations within the City Plan. A mix of sites is being progressed to meet a mix of needs.</p> <p>The JCS will agree the quantum of housing that Gloucester requires.</p>

	Council should identify the most sustainable and appropriate locations for family housing development within the City boundary, based upon a clear understanding of the quantum of such housing needed to meet local demand.	
Brownfield	<p>In general support the use of brown-field sites and the re-classification of buildings for residential use. But this is on the basis that all developments/re-classifications: are proportionate, taking fully into account needs/character of the surrounding area; are the subject of extensive community/stakeholder consultation; successful applications require proper/timely contributions to the necessary investments in infrastructure.</p> <p>Something needs to be done with the areas around the Quays and the Peel Centre when the cinema moves as there is a great deal of unused space, derelict buildings etc there. Greenfield sites should be protected whilst there are so many brownfield or other formerly used sites standing empty.</p>	<p>Comments noted.</p> <p>Matters of infrastructure provision are dealt with as part of the City Plan.</p> <p>The site is privately owned. The City Council will continue to assist, where appropriate, those private landowners who wish to develop their brownfield sites in accordance with national and local planning policies, to ensure suitable and sustainable development.</p>
Landscape	There is a specific need to address more fully the environmental issues including built heritage, landscape and biodiversity in the City Plan area. The City Plan refers on page 5 to the need to “influence the regeneration of the city	Comments noted. The City Plan will address the areas identified to ensure a balanced approach to protection of environment whilst accommodating growth needs.
Shopping	Must find compatible/imaginative uses for vacant shop premises. Quality of street environment an important factor.	Noted
Open space/playing pitch	<p>Retention of sufficient green space to balance the inevitable development</p> <p>We note that there is a Playing Pitch Strategy which covers the local plan spatial area and supports effective planning policies for protection and creating new sites. It is not clear whether works are on-going to implement the strategy with action plans and monitoring. After 3 years without regular review, the Council will need to consider carrying out this work again to keep the evidence base for playing pitches robust and up to date.</p>	The City Council actively negotiate for the inclusion of positive green spaces as part of any significantly sized development. A playing pitch strategy and open space strategy will also inform the preparation of plan polices.
Historic Environment	There are separate sections on employment, retail, offices, tourism etc. The consultation document is completely devoid of any reference to built heritage, landscape, and biodiversity issues. There is also no reference to urban design or the provision of green infrastructure, also key to producing “an attractive place to live and work”. These assets should not be treated as ‘in addition’ but should be an integral part of the City Plan at all stages. The approach suggests that the Council’s	Comments noted. The City Plan will address the areas identified to ensure a balanced approach to protection of environment whilst accommodating growth needs.

	<p>vision is telescopic and only focused on development. This is contrary to the approach set out in the NPPF.</p> <p>There are several references to historic heritage and cultural services in the document but they seem to have confined comments largely to city council cultural attractions. It may be helpful to add a reference to Gloucestershire Archives since it is a cultural/heritage resource for the whole of Gloucestershire and for South Glos but is located in Kingsholm. It also attracts a fair number of tourists (some of the local hotels advertise that they are close to Gloucestershire Archives). Our service also fits in with the desire to promote Gloucester as home of the “knowledge industry” as it is all about protecting and promoting Gloucestershire’s unique information.</p> <p>The SHLAA sites were considered suitable for housing appear to have been carried forward into the City Plan Options Document without the benefit of any further studies or assessments of sites. If this is the case then such an approach is again contrary the NPPF page 38, para. 157, expects Plans, amongst many other points to: “157. Crucially, Local Plans should: “ identify land where development would be inappropriate, for instance because of its environmental or historic significance; and “ contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.” 6. In assessing whether a site is a suitable option for allocation for residential development the Council should have considered existing environmental/historic environment constraints and carried out new surveys to update this information on appropriate sites.</p>	<p>This consultation was for Part 2 of the City Plan which relates to potential development sites. Heritage was mentioned in part 1 and will feature in part 3 which will contain the policies.</p> <p>Further evidence on heritage, biodiversity and landscape is currently being compiled to fully assess any constraints that will impact on potential development sites.</p> <p>Noted.</p> <p>Further work is in the process of being undertaken to assess amongst other things any heritage constraints on the sites.</p> <p>Part three of the City Plan will contain policies relating to the enhancement of the natural, built and historic environment.</p>
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<p>Minerals and Waste</p>	<p>There are a number of sites within the plan (A2, BT1, H1, KW1, KW3, KW5, KW6, L1,L2, WN1, WS13, 1S14) where the British Geological Survey resource maps suggest sand and gravel resources underlying the sites. The extent and economic viability of these resources should be assessed. Careful consideration of any economic resources should be made in terms of the potential for prior extraction in the development proposals.</p> <p>Any major planning application (over 1ha) that is submitted for any of the sites will require a waste minimisation statement as set out within the GCC Waste Minimisation SPD. The waste minimisation statement requests consideration of sustainable waste management at the following stages; project planning and design stage, construction activities, operational life. In regards to waste minimisation, consideration should be given to policy WCS2 of the Waste Core Strategy.</p> <p>Consideration should also be made to core policy WCS11 Safeguarding Sites for Waste Management when allocating sites. A list of the waste sites within Gloucester City has been sent to the City Council and will be available on the GCC Minerals and Waste proposals map.</p>	<p>Noted. This issue will be discussed further with the County Council.</p> <p>Noted</p> <p>Noted - officers will cross reference all sites with the safeguarded sites waste management list.</p>
<p>Housing</p>	<p>In allocating sites for development it is important that the Council identify a sufficient quantum of the right 'type' of housing land to meet the needs and demands of the growing community.</p> <p>Over reliance on apartment development on infill sites rather than allocating larger sites for family housing. It is our view that the Council should allocate a mix of sites capable of delivering both apartment based redevelopment schemes and larger sites capable of delivering family accommodation. The Council should identify the most sustainable and appropriate locations for family housing development within the City boundary, based upon a clear understanding of the quantum of such housing needed to meet local demand.</p> <p>It would be useful to set out within the Plan that requirements for additional dwellings is a as result of increased household formation not simply from an increase in population.</p>	<p>Noted.</p> <p>The City Plan will provide for a mix and type of homes to meet local housing requirements.</p> <p>The JCS process will agree housing quantumns for the City.</p>
<p>Biodiversity</p>	<p>From a strategic biodiversity perspective we would like to draw your attention to guidance on taking account of the Gloucestershire Nature Map in Local Development Plans. This is to be found at http://gloucestershirebiodiversity.net/actionplan/guiding-principles.php on the right</p>	<p><i>Noted - Officers will cross reference sites with the Nature Map.</i></p>

	<p>hand side of the web page. The document is relevant to the consideration of ecological networks as required by the National Planning Policy Framework (NPPF).</p> <p>Although we appreciate that this is much more relevant to the JCS development documents, the City Plan's proposed development allocations should be checked to see if they are within or close to Strategic Nature Areas (SNAs) of the Gloucestershire Nature Map. This is being recommended so that a decision can be made as to where the City Plan should state that there will be a clear requirement for maximising a net gain for biodiversity. Where such an approach is identified and accepted then future sustainable development could contribute to a wider pattern of green infrastructure and ecological network enhancement across the county.</p> <p>The consultation document is completely devoid of any reference to built heritage, landscape, and biodiversity issues. There is also no reference to urban design or the provision of green infrastructure, also key to producing "an attractive place to live and work". These assets should not be treated as 'in addition' but should be an integral part of the City Plan at all stages. The approach suggests that the Council's vision is telescopic and only focused on development. This is contrary to the approach set out in the NPPF.</p> <p>The SHLAA sites were considered suitable for housing appear to have been carried forward into the City Plan Options Document without the benefit of any further studies or assessments of sites. If this is the case then such an approach is again contrary the NPPF page 38, para. 157, expects Plans, amongst many other points to: "157. Crucially, Local Plans should: " identify land where development would be inappropriate, for instance because of its environmental or historic significance; and " contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified." 6. In assessing whether a site is a suitable option for allocation for residential development the Council should have considered existing environmental/historic environment constraints and carried out new surveys to update this information on appropriate sites.</p>	<p>Further evidence on heritage, biodiversity and landscape is currently being compiled to fully assess any constraints that will impact on potential development sites</p>
CIL	<p>New housing development will create new demand for sport and physical activity facilities. Not anticipating or meeting this demand or being able to model supply will have a negative impact on sport and physical activity participation. In order to exert a positive and significant impact on the physical, mental and social health of these new communities we believe that all new housing proposals in Gloucester should</p>	<p>Noted.</p> <p>A playing pitch strategy is being prepared which will inform plan policies .</p>

	<p>provide for new, or enhance existing, sport and physical activity facilities and use planning obligations to secure and maintain such provision.</p> <p>Sport England supports use of planning obligations/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.</p> <p>All new dwellings in Gloucester in the plan period (up to 2031 and beyond) should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.</p> <p>We would welcome the opportunity to meet with you to expand on the above and discuss how this could be incorporated in the Plan in the most beneficial manner, and in particular to look at the incorporation of the Llanthony Hydro Scheme within the Council's objectives and to secure s106/CIL contributions for it and the Leadon Valley scheme as part of Green Energy and Green Infrastructure within, and linking to, the City.</p>	<p>A CIL charging schedule is being prepared through the JCS which will need to be revisited once the City Plan infrastructure requirements are more fully understood.</p>
Waste Management	<p>Any major planning application (over 1ha) that is submitted for any of the sites will require a waste minimisation statement as set out within the GCC Waste Minimisation SPD. The waste minimisation statement requests consideration of sustainable waste management at the following stages; project planning and design stage, construction activities, operational life. In regards to waste minimisation, consideration should be given to policy WCS2 of the Waste Core Strategy.</p> <p>Consideration should also be made to core policy WCS11 Safeguarding Sites for Waste Management when allocating sites. A list of the waste sites within Gloucester City has been sent to the City Council and will be available on the GCC Minerals and Waste proposals map.</p>	Noted

<p>Tourism</p>	<p>For a city with such a great history, medieval architecture, the Docks and the city's location these attributes are woefully exploited. Coming from Bath, where it could be argued that over-exploitation abounds, I find it incredible that Gloucester's rich past is overshadowed by Cheltenham's mono-Georgian glory and feel that more needs to be done to package the cathedral, city centre, docks, military and industrial heritage into an infrastructure package of hotels, restaurants adjacent to the main attractions. Furthermore coach and car parking should not be neglected but needs to be discrete and within walking distance.</p> <p>The developments at the dock are a step in the right direction, however, the shopping experience is pretty sterile and not everyone who enjoys living close to the waterfront wants to live in a converted warehouse. It is a shame that the opportunity wasn't taken to develop a marina bounded by modern residential, retail and recreation. Enhancement through the provision of affordable studios/workshops to develop an arts and crafts, and light industry should add vitality and improve vibrancy and sense of community and add to the attractions for tourists.</p>	<p>Many of these points should be addressed within a tourism strategy. Comments will be forwarded onto the tourism officer.</p> <p><i>Comments on mix of uses are noted and will be taken on board in terms of policies in the Plan.</i></p>
<p>Development quantum</p>	<p>I read that the City is expected to build 6500 houses before 2031. I am unable to discover anywhere the justification for such a build programme. How can the Council justify new build when currently there are over 2000 houses that are not occupied within the City.</p>	<p>The justification for the overall housing requirement is being progressed through the strategic plan called the Joint Core Strategy which is being prepared jointly with the authorities of Gloucester, Cheltenham and Tewkesbury.</p>
<p>Infrastructure</p>	<p>In general support the use of brown-field sites and the re-classification of buildings for residential use. But this is on the basis that all successful applications require proper/timely contributions to the necessary investments in infrastructure.</p>	<p>Comments noted.</p> <p>Matters of infrastructure provision are dealt with as part of the City Plan.</p>

Objectively Assessed Need	<p>The document would be enhanced and would provide a better understanding of the purpose of the City Plan if it were to refer more directly to the City's obligation to meeting its objectively assessed need for additional dwellings. Whilst we are aware that this objectively assessed need has not been confirmed in detail as yet through the JCS, the magnitude of that need and the magnitude of how much of that need can be met within the City boundaries, should be referred to together with the responsibility in the first instance to meet as much of that need as possible within the City boundaries. The Plan would also be enhanced in the same context by addressing the quantum of this need to be met within the City boundary that is capable of being met on brownfield sites.</p> <p>The City is not meeting all of its own need and under the duty to cooperate, some of the need is being met in Tewkesbury Borough. There is a duty on Gloucester to deliver the maximum number of dwellings in its own boundary.</p> <p>Plan should state that neighbouring authorities are being required to meet some of the need generated from Gloucester on allocating Green Belt/Greenfield sites of some environmental sensitivity to meet the City's need.</p> <p>Recognise in the Plan that the requirement for additional dwellings is as a result of increased household formation not simply from an increase in population.</p>	<p>Comments noted.</p> <p>The City Plan will refer to its development requirements as suggested.</p> <p>This issue is currently being progressed through the JCS.</p> <p>The City Plan will identify all suitable, available and achievable capacity within its boundary.</p>
Health/Sport	<p>The importance of sport should be recognised as a key component of local plans, and not considered in isolation. We believe that it is essential that there is a planned approach to the provision of facilities and opportunities for sport and physical activity in order to ensure that the needs of local communities are met and that supply meets demand.</p> <p>Being active should be built in to everyday life. There are many examples of good quality urban design principles and practices that make it easy for communities to be more active and healthy. Increasingly this approach is known as Active Design which focuses on improving accessibility; enhancing amenity and increasing awareness.</p>	<p>Noted.</p> <p><i>Officers will further consider the use of Active by Design when evidencing and drafting design policies for the City Plan.</i></p> <p><i>A playing pitch strategy is being prepared which will inform the preparation of related plan policies.</i></p>

<p>Design</p>	<p>Being active should be built in to everyday life. There are many examples of good quality urban design principles and practices that make it easy for communities to be more active and healthy. Increasingly this approach is known as Active Design which focuses on improving accessibility; enhancing amenity and increasing awareness.</p> <p>Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness.</p> <p>Sport England would encourage the developers to design future proposals in Gloucester in line with the Active Design principles.</p>	<p>Noted.</p> <p><i>Officers will further consider the use of Active by Design when evidencing and drafting design policies for the City Plan.</i></p>
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SHLAA issues

Issue	Representation	Response
Inconsistencies between 2011 and 2012 SHLAA	No evidence alluded to in 2012 SHLAA to support changes in approach between 2011 and 2012 SHLAA's with regard to site known as Land east of Hempsted.	Noted. The 2012 SHLAA was informed by the emerging JCS Landscape Characterisation and Sensitivity Analysis evidence work which did not include the site 'Land east of Hempsted' as it was considered to lie within the existing urban area of the City, and therefore not subject to a landscape designation to render it 'unsuitable' for development in the SHLAA. Neither at this time was the site subject to a statutory adopted landscape protection policy. Additional landscape work commissioned by the City Council from WSP and published in autumn 2013 identified developable areas of the site. The site is now the subject of an outline planning permission that was granted in December 2014.
2012 SHLAA not properly prepared	2012 SHLAA not prepared in accordance with guidance contained in the DCLG 2007 SHLAA Guidance or the NPPF.	Noted. Gloucester City has always endeavored to prepare an accurate and up to date SHLAA that takes account of the emerging evidence base of both the JCS and City Plan development plan documents in accordance with emerging government guidance, including the NPPF.

<p>2012 SHLAA sites found 'suitable' carried forward into 2013 consultation document without further evidence.</p>	<p>A sites options document should be accompanied by an additional evidence base to support sites where they have previously been subject to historic or environmental constraints.</p>	<p>Noted. The 2013 sites consultation document was based on sites considered 'suitable' for development in the 2012 SHLAA. Preparation of the City Plan is an iterative process, new landscape and historic environment evidence will support future City Plan consultations.</p>
<p>2012 SHLAA is developer led and does not take account of existing policy designations.</p>	<p>The 2012 SHLAA is a response by the City to the need for the JCS to release green belt sites in Tewkesbury Borough in order to accommodate the City's future growth. The Council should be aiming to provide a good quality environment in the City as well as meeting housing needs.</p>	<p>Noted. The NPPF requires local planning authorities to demonstrate a 5 year supply of suitable, available and deliverable sites for the delivery of housing. In preparing a SHLAA the authority is obliged to consider all sites within the City promoted to them for this purpose, this includes both green field as well as brown field sites. Within the City where green field sites are not covered by a statutory national designation, in the absence of any locally up to date adopted or saved policy , such sites are considered 'suitable' for development.</p>
<p>SHLAA & SELAA identifying development opportunities</p>	<p>The Highways Agency notes that development opportunities have been identified through the SELAA and SHLAA process in line with national policy. Highways Agency also note that many proposed allocations were also contained in the LDF Site Allocation and Designation Document and Central area Action Plan both of which reached preferred option stage in 2006.</p>	<p>Noted. (Former Highway Agency now known as Highways England).</p>

Sustainability Appraisal issues

Issue	Representation	Response
General comment	Not clear whether the Highways Agency was consulted on the SA Scoping Report in 2005.	At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thorough through the Sustainability Appraisal process as the City Plan is progressed. The City Plan will be assessed from a SA perspective in accordance with the SA Scoping Report (October 2008). The Highways Agency was engaged in the preparation of this Scoping Report.
Highways	SA could be expanded to include reference to the kinds of transport mitigation which may be necessary to mitigate the effects of different proposals.	At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thorough through the Sustainability Appraisal process as the City Plan is progressed. This will consider issues such as those highlighted and will draw on the most recent evidence base, which includes detailed highways work.
Highways	Strongly agree with the statement that it will be necessary to consider cumulative impacts as opposed to just impacts on a site-by-site basis. However, no information is provided on what evidence has, or will be prepared, to analyse cumulative effects, transport or otherwise.	At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thorough through the Sustainability Appraisal process as the City Plan is progressed. This will consider issues such as those highlighted and will draw on the most recent evidence base, which includes detailed highways work.

<p>Hempsted</p>	<p>The appraisal for Hempsted is very light in detail and appears to be confined to a description of all that is good about Hempsted.</p> <p>The SA fails to properly appraise the different sites in Hempsted, in particular it fails to describe the importance of the open agricultural fields to the east and west of Hempsted Lane in terms of retaining the special rural character and separate village identity of Hempsted.</p> <p>The SA contains no reference to any negative impacts of developing any sites in Hempsted. There does not appear to have been a proper SA carried out for Hempsted and the Council must do this before it takes any more steps in the City Plan preparation.</p>	<p>At this early stage in plan preparation, the Council has sought to identify the key sustainability issues that will be considered more thoroughly through the Sustainability Appraisal process as the City Plan is progressed. This will consider issues such as those highlighted and will draw on the most recent evidence base.</p>
<p>WS12 – Land East of Hempsted Lane</p>	<p>The assessment ignored constraints identified in the Hempsted Conservation Area: Appraisal and Management Proposals.</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014.</p>

WS12 – Land East of Hempsted Lane	<p>Biodiversity</p> <p><i>Current Situation and Opportunities</i></p> <p>It is unclear what level of biodiversity the fields East of Hempsted Lane support. They do link with the wider countryside and River Severn valley and floodplain and may well be used by a variety of wildlife visiting from these areas. The now established planting of deciduous hedgerow species along the eastern and southern boundaries may also have provided new habitats for birds and other species. There are the remains of the last surviving old orchard in Hempsted, which also provides a habitat for mistletoe. There also appears to be evidence of springs in the fields which could also be attractive as a habitat. The fields have the potential to create part of a green infrastructure network in this part of the City which could provide a major opportunity for creating and enhancing habitats, benefiting the wider community in south Gloucester.</p> <p><i>Impact of Development</i></p> <p>Development of the site for housing will prevent use of the area by any wildlife, destroy hedgerow habitats or make hedgerow habitats less attractive</p>	
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	<p>to wildlife and prevent opportunities for provision of green infrastructure.</p>	
<p>WS12 – Land East of Hempsted Lane</p>	<p>Natural Environment: Objectives: Improve soil quality; Protect and enhance landscaped character</p> <p><i>Current Situation and Opportunities:</i> In terms of agricultural use the fields currently provide grazing for cattle and it is therefore assumed the soils provide for good growth of grass. At one time the area supported an orchard which because of lack of management has deteriorated in quality. Historically the area supported a ridge and furrow farming system which suggests a fertile soil.</p> <p>The fields are in active agricultural use for grazing and the soils appear capable of supporting other forms of agriculture.</p> <p>Impact of Development: Complete loss of existing and potential agricultural uses.</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014.</p>

<p>WS12 – Land East of Hempsted Lane</p>	<p>Natural Environment: Objective: Protect and enhance landscaped character.</p> <p><i>Current Situation and Opportunities:</i> The fields form an important part of a belt of continuous orchard, meadow and playing fields that run south to north from Hempsted to, and including, the Gordon League rugby ground and about the Inner Relief Road (Secunda Way). The fields and Hempsted playing field are currently designated as part of a wider 'Landscape Conservation Area' designated in existing Local Plans. The fields proposed for housing, together with fields to the west of Hempsted Lane are critically important to the setting of the conservation area. They help to preserve the sense of separation from Gloucester, to maintain the green and rural village character and identity of Hempsted, and they protect important views.</p> <p>There are opportunities to enhance the landscape character by laying the recently established hedgerows which would also further enhance important views of Robinswood Hill and other high ground and features.</p> <p>Impact of Development:</p> <p>To develop fields that are an integral part of the</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014.</p>
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	<p>rural character of Hempsted would be to change the character of the conservation area, sever the link with the agricultural past, lead to a much denser village scene, tip the balance in the village mix of modern and historic buildings in favour of the modern, and lead to the loss of panoramic views towards Robinswood Hill and the Cotswolds escarpment views (whilst some of these views are temporarily partially obscured by planting of hedgerow trees along Hempsted Lane, there are still views from the farm gate adjacent to Manor Farm House and from the footpath leading from Hempsted lane to the children's play area and playing field). It would result in the coalescence of the main urban area with the resulting total loss of the village character and identity of this part of Hempsted.</p>	
<p>WS12 – Land East of Hempsted Lane</p>	<p>Built Environment: Objective - Protect and enhance the distinctive townscape quality and historic heritage</p> <p><i>Current Situation and Opportunities:</i> See comments above on 'Protect and enhance landscaped character' which are equally relevant to townscape quality and historic heritage. In addition the fields contain a complete medieval ridge and furrow system, with strips running in an elongated S shape, and headlands representing the turning point of the plough. This is one of only two examples in Gloucester District.</p>	<p>WS12 now has Outline planning permission for residential development granted in December 2014.</p>

	<p>A Council interpretation board along the southern boundary of the site explains the significance of the ridge and furrow as well as the views toward Gloucester Cathedral and of the industrial heritage of the Gloucester and Sharpness Canal; and the old orchard trees and mistletoe; These fields are a valuable educational resource for the whole City as well as of great importance to the distinctive townscape and historic heritage.</p> <p>Impact of Development:</p> <p>See impacts under 'Protect and enhance landscaped character' which are similar. In addition development would result in the loss of the ridge and furrow field system.</p>	
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