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

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

Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.

street trees, green roofs, insect-friendly areas of planting and bird & bat box provision.

The document should make some reference to Paragraph 58 of NPPF which explains the need to "Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion." Additionally Gloucester City Council's 2016 publication 'Designing Safer Places should be mentioned or referenced.

Agreed. Additional text will be added within section 2.1 National policy & guidance, which details these points.

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape, through sensitive siting and good design, and avoid unacceptable impacts.

Agreed. Local distinctiveness is a key theme within the principles section, primarily relating to the use of materials and the basis upon which the categories of spaces plan was developed.

Strategy: Category of Spaces

We agree in principal with the category of spaces, however, the use of the terms Primary and Secondary for areas , where these are already used in road classification, but with widely opposing meanings, is likely to lead to confusion for developers.

Noted. While the wording used is the same as road classifications as noted, it is unlikely that the two distinct areas of design would be confused, particularly given there are already very precise Highway requirements set out in various documents. Any area of Highway would primarily be covered by Highway legislation with the PRS acting as an additional guide to enhance overall quality in specific areas.

The primary "red" route between the city centre and the Docks/Quays should be continuous, rather than having the secondary "orange" route overlaying it and therefore appearing to take precedence.

Noted. The area in question includes Kimbrose Way which is treated with coloured tarmac, which relates to the Secondary range of materials, set out on page 33. The Primary

The principle objection of our client to the document as drafted is that the text and plans (pages 5 and 13 for example) within the DGPRS identify vast swathes of **private** land within the city centre as 'public realm'. For example, private land currently identified in the DGPRS includes land owned by our client but land also owned by the Cathedral and Canal and River Trust. To be clear if the DGPRS was sought to be used as a vehicle to allocate land as 'public', this would be unlawful. However, even if the document were not seeking to 'allocate' land, identifying private land in an SPD as 'public realm' may have the unintended consequence of undermining our clients ability to exercise their rights and ability to use their private land as they see fit. Therefore our client would respectfully suggest that a number of changes are made:

- 1. (1)It is made clear by a statement in the introduction to the document that the DGPRS is not a land use planning document.
- 2. (2)That a statement is made clarifying the purpose of the DGPRS is to provide additional guidance on preferred materials and the design approach supported by the Council to areas of 'Public Realm' in the strategy area. In this regard the SPD provides additional guidance to supplement the emerging Joint Core Strategy and Gloucester City Plan.
- 3. (3)That the document clearly distinguishes between public and private land in the strategy area, ideally through clarifying this on the plans in the document, but notably those on pages 5 and 13. If this is not possible, then text should be added to the document and as notes to the plans that clarify that the strategy areas includes both public and private land.
- 4. (4)The plan on page 20 identifying 'Public Realm Projects' should be updated, to either omit those on private eland, such as Orchard Square, or identify that

category would involve granite pavers to the Highway.

Noted. The main Categories of Spaces plan indicates three distinct types of spaces, which include a range of different types of land classification, including private and City and County Council owned. The response notes set out below aim to provide specific answers to the points raised.

Noted. Paragraph 1.6 within the Introduction chapter will be amended with additional text to cover points 1 and 2.

Noted. The document will be amended to include a caveat statement, as it is not seen as beneficial to complicate the simplicity of the Category of Spaces plan. Section 4.2 will be amended to include an additional paragraph explaining the issue in more detail, with the heading altered to 'space classification'.

Noted. In addition to the amended para within the introduction chapter, an additional

	these are privately owned areas where given some public use, the same high quality treatment of the spaces in terms of material and design are sought as for areas of 'public realm'. Character Areas (p13). How have these been determined and how should they specifically inform spatial proposals within them (as against the Category of Spaces from p27 onwards)? Useful to cite evidence base.	paragraph will be inserted after 3.7.4 explaining this issue. Noted. The differences between distinct character areas is evidenced through the Conservation Area Appraisals which are available to view or download from the Gloucester City Council website.
Strategy: Proposed Materials	The graphical matrix is not clear, and uses too much modular/block/stone.	Noted. The graphical matrix provides images and descriptions of each type of material suggested for each part of the public realm, arranged into the three categories of spaces identified on the plan on page 27. The use of higher quality stone, sometimes using smaller module sizes, provides an enhanced appearance, compared to the standard materials but alternatives would be considered during any design process. The use of higher quality natural stone in selected areas would also better relate to areas of historic importance.
	Recommend the use of coloured surfacing, for all vehicle routes, and conservation kerbing, rather than granite setts.	Noted. There are a number of issues regarding the use of coloured surfacing, including issues around maintenance and reinstatement, including coloured surfaces showing oil and tyre marks, and where road works have taken place, inappropriate reinstatement often leads to a patchy and negative appearance. For secondary routes, the use of restricted areas of dark grey tarmac, combined with higher

		quality pedestrian areas is proposed in the PRS. Conservation kerbing is suggested for secondary routes, with the higher quality granite for the primary areas. The PRS is a guide and some variation is expected in final material selection.
	The maintenance of uneven surfaces like cobbled stone and stone slabs is of utmost importance to avoid trip hazards or twisted ankles.	Agree and noted.
Strategy: Design Affecting visually impaired, disable or Elderly Groups	More zebra crossings advisable to guard the safety of pedestrians and people with mobility difficulties. Specific concerns are: -The access ramp leads past the Gloucester Museum and the Conservative Club to the Eastgate Centre; -The crossing point for mobility scooters coming from Shopmobility past Sahara Lounge; - Difficulties for people with mobility difficulties who want to enter the Eastgate Centre adjacent to the ramp that leads to the Eastgate Centre.	Noted. The PRS sets out broader principles which aim to guide future detailed public realm proposals.
	The train station is in close proximity to the hospital but only for those who can navigate the subway. This should be made pram / wheelchair accessible, or a second exit provided to lead to Great Western Road.	Agree. The link between the train station and the hospital area, via the subway, is identified as part of the strategy area, and is one of the regeneration priorities for the City.
Strategy: Highways	Reference is made to Manual for Streets (MfS) and Table 3.1 of MfS is a useful process to apply to proposed changes to existing streets. The process consists of 7 Stages and a Non Motorised Users Context Report should have been undertaken in Stage 2 – 'Objective Setting.' It would also appear appropriate that Stage 4 – 'Quality Auditing' should be undertaken at this stage (section 3.7 of MfS) to support the Strategy. As a minimum this Audit should include a Road Safety Audit (including a Risk Assessment), access, walking and cycle audits and a Non Motorised Users Audit.	Noted. The PRS sets out broad design principles which aim to guide further more detailed proposals for specific areas. All the relevant guidelines will be considered at the more detailed level.
	Proposal to create "places" at street intersections – these must be able to	

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

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

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

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

beds and planters around central Gloucester are only occasionally looked after. This led to many of the birch tree planters drying out and dying which was a real shame, given the good idea of the bee-friendly planters.

The picture of the bricks around the tree roots on page 37 clearly shows a lack of understanding how trees grow! Removing more of these bricks and replacing them with stone that tapers into the ground will reduce these trip hazards. Alternatively a substantial loose fitting grille around the trees will allow rainwater into the soil as well as removing this trip hazard. There should also be more space for large planted containers and street trees within these streets and spaces. They will add to the attractiveness of the area.

Agree. Considering how trees grow over time and the impacts is essential. The use of tree grilles is a good way to mitigate the impacts of tree roots while also adding a decorative feature.

Intelligent use of water features and elements used in Sustainable Urban Drainage Systems (SUDS) will be beneficial and forward looking in these particular areas.

Noted.

The principles for street trees and planters at 5.6.4 and 5.6.5 are supported. It could perhaps be added under the 4th bullet beneath 5.6.4 that wildlife (biodiversity) value such as for insects and birds might also be a consideration to factor in?

Noted.

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: green roof systems and roof gardens; green walls to provide insulation or shading and cooling; new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Noted.

Whilst we welcome the introduction of a set of principles to be followed should new planting be considered, we believe that there should be a stated ambition to not only maintain but increase the tree cover within the public realm strategy.

Noted. An increase in street trees would have to be carefully considered, given issues relating to underground services and archaeology.

Any mulching materials used with on planters or other landscaping features should carefully choose the materials used to restrict criminal or ASB activities.

Noted.

To avoid any conflict and reduced capacity, the lighting and landscaping should be Street

Noted.

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

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

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