

## City Centre Conservation Area Public Consultation and Adoption Report

Between Wednesday October 25<sup>th</sup> and December 20<sup>th</sup> 2023 a public consultation on the draft of the City Centre Conservation Area Appraisal and Management Plan was undertaken with the aim of obtaining public opinion on this document and the proposals within it.

The questions that were asked in the public consultation were:

1. What do you think about the City Centre Conservation Area Appraisal document?
2. What do you think about the management proposals made in the City Centre Conservation Area Appraisal document?
3. Are there any additional management proposals you think the document should make to help Gloucester City Council improve the City Centre Conservation Area
4. Is there anything else you would like to say about the City Centre Conservation Area, the Appraisal document, or the management proposals?
- 5.

Publicity was undertaken in a number of ways including information on the internet, on social media and in the local press. A mail out to all the residents/occupiers in the conservation area was also undertaken, and posters were put up.

Copies of the appraisal document were posted online, whereas hard copies were made available at the public library and the council offices. An additional hard copy was made available to the Westgate Residents Group.

A number of meetings were also held to promote the publication. To meet the requirements of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 Section 71, this included public meetings (2 were held) but also meetings with different stakeholders. A list of the meetings (put forward and actually held), as well as the number of attendees and a summary of their comments can be found on the following page.

To supplement this, a staffed 'drop in' stand was placed in Eastgate Shopping Centre to enable members of the public to talk to the GCC Heritage team about the document and provide their comments.

A total of 18 responses were submitted on the website, whereas a further 6 were submitted by email. These comments, and how they have been responded to, can be found later in this report.

An updated copy of the City Centre Conservation Area Appraisal and Management Plan, reflecting the comments put forward in the public consultation, is submitted with this report, for it to be considered for adoption by Gloucester City Council as a Supplementary Planning Document.

### Consultation Record – Meetings and Mail Outs

Date and Location	Group	Attendees	Comments
14.11.23 and 07.12.23 6pm Guildhall	General Public	1 and 0	That the public consultation had not received wide enough publicity.
15.11.23 6pm Folk	Civic Trust	7	Issues raised included: general condition of city centre – dirty, lack of maintenance
24.11.23 4pm Guildhall	City Centre Commission	Approx. 20	Suggested use for Longsmith Street Carpark – multiuse community site.
05.12.23 6pm The Dukeries	Westgate Residents Group	14	Lack of street maintenance Parking on pavements, without action being taken. Concern that improvements end at Shire Hall rather than extending to the end of Westgate Street. Also wanted a connected approach from Westgate Street car park to draw in visitors. The inclusion of the trees bordering the Westgate Street car park within the conservation area was also suggested.
06.12.23	Stand at Eastgate Shopping Centre	12-15 people provided feedback	Issues raised focused on lack of maintenance and street cleaning. Streets appear dirty. Anti-social behaviour also an issue.
31.10.23	Consultation notification email	252 individuals and organisations contacted included Statutory Consultees	

28.11.23	Mail out to residents of CCCA	1133 residents contacted.	
	RTPI Young Planners		Did not happen as date could not be arranged.
	Gloucester College		Meeting could not be arranged, though informal feedback from students involved in a wider discussion has been provided. Issues they raised included concerns about feeling unsafe within Gloucester.
	University of Gloucester		No response

Responses received through the Public Consultation Website.

	What do you think about the CCCA Appraisal document?	What do you think about the management proposals made in the CCCA Appraisal document?	Are there any additional management proposals you think the document should make to help GCC improve the CCCA?	Is there anything else you would like to say about the CCCA, the Appraisal document, or the management proposals?
1	Excellent, informative and easy to access	I would support them	no	I fully support them
	Officer Comment: Thank you for your positive comments.			
2	<p>I think it addresses many of the concerns, but doesn't seem to action them. For example, under the SWOT analysis, it says as an opportunity "Ensure high quality new development that is sensitive to the historic city centre". Nothing that is currently being built in the centre is sensitive to the historic city centre. It is all modernist with old names 'friar orchard' etc.</p> <p>Like many cities in post-war Europe, when the opportunity arises, we should re-build as the towns were before post-war town planners and their modernist/car centric/brutalist approach.</p>	I agree with them - but as mentioned above, they don't seem to be practised. Unsympathetic buildings are planned and erected with little attention for the historic look and feel of Gloucester and will date awfully	Enforcement of your proposals. Force absentee landlords to vacate properties through compulsory purchases. Remove unsympathetic eyesore buildings that are vacant. Re-build Gloucester to look like it did before post-war modernism	As above

	<p>The Northgate street Sainsbury's is a classic example of this.  <a href="https://www.punchline-gloucester.com/articles/a-news/sainsburys-site-in-major-bid-for-city-living-flats">https://www.punchline-gloucester.com/articles/a-news/sainsburys-site-in-major-bid-for-city-living-flats</a></p> <p>This is a 21st century version of what they did in the 60s, with very little care for the fact it's surrounded by medieval buildings. It should be built in character, and replicate what was there before a slab of concrete was placed there. That is how to give areas its identity back, bring back tourism and make a place unique. Every city is blighted with 21st century architecture that won't last. Let's make Gloucester different.</p>			
	<p>Officer Comment:  Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.</p>	<p>Noted.</p>	<p>Noted.</p>	
<p>3</p>	<p>Please consult us where the proposals may be affected by Severn Trent Water infrastructure. The public sewers and water mains records can be viewed via</p>			

	Digdat.co.uk. Please be aware that due to The Private Sewers Transfer Regulations June 2011, the number of public sewers has increased, but many of these are not shown on the public sewer record.			
	Officer Comment: Thank you for contacting us regarding the City Centre Conservation Area appraisal and making us aware of the increase in public sewers.			
4	While the enhancements sound well-meaning, I find it hard to believe the fact tourism needs to include a lot more independent and other shops into the area seems to be omitted from the document. People want to shop and eat and drink out. Upgrading buildings is not enough. Landlords rents need to be brought down, out of town landlords need talking to. Where is the mention of clock in the arcade? That was not looked after? Other shops have moved out of Gloucester as lack of tourists from Japan and USA would visit that clock.	A bit lacking passion. It felt like a document done to appease a growing pissed off population, I don't see much community information in there. Are you consulting with shop owners?	Include bringing in independent businesses, other retail and talking to out of town landlords who are pricing local businesses out of the area. It is not just about the appearance of city but the 'feel' and right now it's dying.	Talk to the shop and business owners this time. Talk to businesses that have left to go to other areas (Hothouse that left to go Worcester for example who are now thriving there, the manager told me the clock not being taken care of reduced tourism). Stop driving everyone to the Quays and stop making the forum development and kings square a priority, you are trying to make a new centre for Gloucester and we will never see it that way.

	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	Noted. All occupiers/residents of the conservation area were consulted.	Noted. The marketing of the city to attract businesses and visitors is beyond the scope of the conservation area appraisal.	Noted.
5	I think the document is very thorough and is an accurate description of the city centre.	I fully support the management proposals.	I think existing shops should be made (over time) to update their shopfronts to be more in keeping with the conservation area - with grants available for small businesses. Perhaps local signwriters could be commissioned.	
	Officer Comment: Thank you for your positive comments.		Funding has recently been made available in the Cathedral Quarter HSHAZ, but unfortunately at present there is no new funding available. Forcing shops to update is at the discretion of their owners/occupiers, it is not something a council can force.	
6	Well presented. An authoritative source of Gloucester history and proposes a considered sympathetic way forward .	Good	Yes. On going management of the plan need a specific management with authority.	No
	Officer Comment: Thank you for your positive comments.			

7	Good any regeneration is positive for the city	Fine	No	Not at the moment
	Officer Comment: Thank you for your comments.			
8	Conservation needs to be done sensitively and with historic accuracy.	Don't repeat the mistakes of past re-developments and lose the heritage of this historic Roman City.	It is essential to preserve the heritage and history of this City. So many opportunities if preservation have already been lost. If we had followed the examples of cities such as York & Chester, we would now be benefiting from excellent tourism.	During the next 9 days please ensure this appraisal document gets publicised as widely as possible. Spread the news in local radio etc. I found it by accident on social media
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.			
9	Not a lot to argue with!	Would like some constructive usage of the "negative" buildings - could paint and mouldings be used to turn them into, at least, interesting facades?	How are you going to get the right retail offerings? You can make the buildings as nice as anything but if the area remains full of vape shops and tattoo parlours (or simply empty premises) then it's going to be worthless effort.	More and better residential units would help. Can balconies be bolted onto flats? Are there grants available to improve interiors?
	Officer Comment: Thank you for providing your thoughts and suggestions on	Noted.		The encouragement of the sensitive conversion of upper floors to residential use is one of the management proposals put forward



	the City Centre Conservation Area appraisal.			in this appraisal, and something that that has been actively promoted through the HSHAZ.
10	It is a comprehensive and well written document. It may need a summary for people who don't wish to read the whole thing.	They are sensible, but may be difficult to achieve without some funding or political backing.	Shop front design and fascia signage should be better controlled. Other historic cities don't seem to have the same problem of inappropriate designs, sizes and materials with their shop fronts on older buildings.	I hope it is approved and implemented.
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.  Noted.		The possibility of introducing an 'Area of Special Control' of advertisements will be put forward in the management proposals.	
11	A thorough and researched document. I have no specialist knowledge, yet it appears to adequately represent both the strengths and weaknesses of the Area.	I have reviewed solely with regard to extension of the Area at the West end of Westgate Street. Protecting the trees is worthwhile for the trees' worth, however the text seems to say that the trees' function is to shield the GCH apartments from view. Perhaps we should consider improving the exterior to these apartments?	As above, we should improve the exterior appearance of the GCH Westgate Estate. The improvements to Westgate Street are likely to end at Shire Hall. They should extend to Castlemeads Court, to lead visitors from the Westgate Street Car Park into town. We need a unified and attractive feel for this stretch of road.	Although outside the area, many residents are unaware of Alney Island and the Boating Lake. Could we include appropriate information boards at the Car Park and outside Castlemeads?

	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	Thank you for your feedback on this specific proposal. The text in this part of the appraisal will be reviewed.	Noted.	This suggestion relates to land beyond the City Centre Conservation Area and the scope of this appraisal
12		<p>Several of the concepts need to offer a greater level of description, at the moment the management proposals offer an idea but would benefit from more detail.</p> <p>Graffiti and criminal damage are continually affecting every surface within an urban setting, a plan needs to be created to address these issues and have a clear process for removing the damage.</p>	<p>The policy needs to include more information about the legal implications and how Gloucester City Council intend to combat Heritage Crime.</p> <p>How does the policy address the preservation of public art and other features with significant cultural interest?</p> <p>A clear definition needs to be created which differentiates the features and characteristics of 'street art' from 'graffiti'.</p> <p>The idea that a building within the conservation area, who have become victims of crime, should be offered special measures or assistance when the fabric of the structure has been blighted by graffiti or criminal damage.</p>	A clearer definition within Paragraph 2.1.2 would be advantageous when it refers to buildings which have been identified as 'negative'. Architecture and history can be subjective and opinions may vary depending on political and cultural pressures of the time, therefore can a clear definition be provided to explain why one building could be positive, while another might be negative.
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	<p>Noted.</p> <p>Measures are in place to address issues of graffiti and criminal damage through</p>	Thank you for your comments regarding Heritage Crime. Unfortunately, the LPA is not in the position to offer special measures or assistance when	The definition of 'negative' will be reviewed.

		<p>both the City Council and the local police.</p> <p>The City Council takes a proactive stance to the removal of graffiti on historic properties, and seeks funding from a range of sources to protect and repair heritage buildings</p>	<p>buildings within the conservation area are affected by heritage crime.</p>	
13	Timely	<p>Improvements must be made to enhance Gloucester as a tourist destination as well as for local residents.</p>	<p>Of immediate and one would presume lower cost implications would be better street cleaning and clearing of weeds at the edge of roads and buildings The Ladybellegate area is a particular eyesore.</p>	<p>Hope that some of the proposals come to fruition</p>
	<p>Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.</p>	<p>There are a number of schemes currently underway (for example the HSHAZ) that aim at enhancing Gloucester.)</p>	<p>Thank you for providing this information. It will be passed on to the relevant team within the council.</p>	
14				<p>In case you'd like to attract more visitors and locals more parking space would be essential. Try to keep or improve character of city centre of course 'hidden' spaces (roof parking or deep parking option) would be ideal. That's already a huge problem not only for visitors even more so the local (GL1) residents.</p>

	Officer Comment: Thank you for providing your suggestions on the City Centre Conservation Area appraisal.			Noted.
15	I am pleased to read such a well thought out and comprehensive, well detailed plan.	I agree with all the proposals for Guidelines and Enhancements in section 4 of the document. If these proposals are acted out in full, ensuring good quality of materials and in aesthetics, this should raise the profile and pride in this City both locally and nationally, and emphasise its beauty and historical importance.	Please see my answer number 4 below.	Improved cleaning of the streets and public seating could be carried out. For example, the streets and public seating were very dirty during the September 2023 Gloucester History Festival and ideally should have been cleaned before this event. This surely will showcase the City and give tourists a better impression of the City than they may have than at the present time. Improved police patrols would decrease the amount of antisocial behaviour i.e. drinking in the streets and open areas, and shouting from individuals. Also vehicles using the pedestrianised areas and acting recklessly. These daily occurrences make it unpleasant for all those who visit the City, whether locals or tourists.
	Officer Comment: Thank you for providing your thoughts and suggestions on the City Centre Conservation Area appraisal.	Noted.		Thank you for providing this information. It will be passed on to the relevant team within the council.
16	It is interesting as a starting point but does not include the social and economic	As above	Not a simple problem to fix – prevalence of homelessness, anti-social behaviour at all times	Page 35 – photo is of May Hill and the Forest of Dean hills, not the Malverns!

	factors that affect how any changes that are implemented will work with the reality of the existing communities in the CA.		of the day, even down to the casual littering. All make a negative impact and hard to see how the proposals take this into account. A cultural centre that is only affordable to some. There are already so many things in the CCCA that are only affordable to the minority. And there is already noise at anti-social hours that negatively impacts life in Greyfriars community.	
	Officer Comment: Thank you for providing your comments on the City Centre Conservation Area appraisal.		Noted.	Noted. This will be amended.
17	The appraisal is very thorough from a heritage perspective, but there is very little reference to how people might best access the Conservation Area from an active travel perspective, or how physical activity can be facilitated or encouraged. There is mention of enhanced pedestrian links, but no reference to accommodating cycling and wheeling, or wellbeing more generally.	As above, it would be good to see some comment or detail on how physical activity and active travel can be supported. All places and spaces should encourage physical activity, not just buildings and facilities for sport, activity and leisure, but open spaces, green infrastructure, urban public realm, heritage assets and streets. Providing multifunctional spaces allows for physical activity to be delivered alongside other priorities,	Active Gloucestershire would strongly recommend that reference is made to Sport England's Active Design Guidance - <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</a> . The City Council should also consult the resources available on the Healthy Streets website - <a href="https://www.healthystreets.com/">https://www.healthystreets.com/</a>	Active Gloucestershire would be very happy to work with the city council to explore how physical activity can be supported and promoted within the city centre conservation area. Please contact Richard Fishlock - Strategic Lead for Facilities & Active Environments - <a href="mailto:richardfishlock@activegloucestershire.org">richardfishlock@activegloucestershire.org</a>

		such as biodiversity, community space, sustainability or other needs, enabling the function of spaces to be maximised.		
	Officer Comment: Thank you for providing your comments on the City Centre Conservation Area appraisal.	Noted.	Noted.	Noted.  The encouragement of physical activity and active travel are beyond the scope of this document, however, the Council is keen to encourage them and already works with Active Glos as well as other partners to encourage pedestrian and cycling access to the city centre and to lengthen dwell time.
18				I would like to see more greenery and trees in the city centre to soften up the landscape, and I would like to see fewer new buildings. Collectively we should be spending more money on derelict and old buildings  Public art is a good thing, and the art we have in the city centre is ok, but often it gets out dated (like the CD rack on Southgate Street), so we need to ensure that public art in the city centre is somehow future-proofed.
	Officer Comment:			Noted.

	Thank you for providing your comments on the City Centre Conservation Area appraisal			The introduction of more greenery, including trees, to the city centre is beyond the scope of this document, however, the Council recognises their importance to creating a vibrant and attractive city centre and is continually delivering projects that will provide greenery (eg Westgate Street).
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Comments submitted by email.

Organisation	Comments Received	Officer Comment
Canal and Rivers Trust	'The Trust have reviewed the document and policies contained within it, and based on the information available we have no comment to make.'	Noted.
National Highways	'Thank you for providing National Highways with the opportunity to comment on the Gloucester City Centre Conservation Area Appraisal. As you are aware, National Highways are responsible for the strategic road network which in Gloucester comprises the A40 and A417 trunk roads and the M5. Having reviewed the documents provided we are satisfied that the proposals within them are unlikely to result in an adverse impact upon our network and we therefore have no comments.'	Noted.
Gloucestershire Wildlife Trust	<p>I am writing to you to provide Gloucestershire Wildlife Trust's (GWT) response to the Gloucester City Centre Conservation Area Appraisal.</p> <p>We acknowledge that this appraisal is strongly centred around heritage, but it is an opportunity to highlight the important role that green infrastructure (GI) has to play in helping to; support and protect heritage sites and surrounding urban areas from the impact of climate change, (including urban heating and flooding); making them better spaces for nature; and adding to their visual appeal and supporting the well-being of Gloucester's residents and visitors. Various studies show the benefits of nature-based solutions to heritage sites, which prevent them from becoming grey 'historic holes' in cities. The Gloucester City Plan also raises the importance of greening urban areas with more GI, to support biodiversity and tackle the impacts of climate change (addressing the climate emergency</p>	<p>Noted.</p> <p>The Council acknowledges the importance of Green Infrastructure to tackling climate change as well as creating a pleasant and attractive environment in the city centre.</p> <p>The City Centre Conservation Area appraisal document acknowledges the positive impact that the introduction of greenery has on the built, historic environment but it is not strictly within the scope of the document to address it. However some amendments have been</p>



	<p>declared by the City Council). The current document doesn't make the most of this opportunity and we would like to see some amendments to take this into account.</p> <p>A few comments are made throughout the document that acknowledge the lack of green infrastructure and its importance. For example, page 21 recognises the ambiance that street trees create in urban areas. It also references the visual contrast they provide in high density, hard landscaped areas. Page 23 states that there is a limited amount of vegetation in the Gate Streets character area, which could be improved, and that St Mary de Crypt is a valued rare greenspace. Page 24 states that the introduction of more needed greenery in Westgate Street is planned for 2024. There is a clear acknowledgement of the need for more GI across these heritage sites. However, in the weaknesses and opportunities for each of the character areas, there is very little reference to the role that GI could play, which suggests a lack of commitment to incorporating it.</p> <p>We appreciate that maintenance of green infrastructure in cities is often one of the main reasons for the lack of it. This should not be a blocker to its implementation. For example, there could be opportunities for local businesses to sponsor/support in the maintenance of GI (for example, maintaining planters near to their offices or in spaces they can go and sit for breaks/lunch). This could be through volunteer days for staff, for example. An opportunity for businesses to show an expression of interest in supporting this could be provided. Raingardens can also be a low maintenance option to planters and may be a good alternative in some places. GWT have done a lot of work in Gloucester in the past to support the delivery of planters,</p>	<p>made to be made to appraisal document to provide more references to green infrastructure.</p>
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	<p>trees and raingardens, and we would be happy to provide our expertise to support in their delivery.</p> <p>There are some areas mentioned in the consultation which have very little GI and a lot of hard landscaping and therefore act as barriers for wildlife to move through the city. Adding planters or more native street trees where possible could help to address this. Sadly, some areas, including Kings Square, have undergone recent regeneration which did not incorporate much additional green space. This could have reduced the amount of surface water run-off during heavy rainfall leading to potential flooding, in a city which is already facing a growing threat from flood risk. To help mitigate the impacts of increased flood risk, more planters or rain gardens could be added to the area. These should include attractive native, flowering plants that are good for pollinators and will help to increase biodiversity and bring nature into the city, as well as providing some resilience to climate change impacts. Future regeneration projects must have sufficient GI incorporated into their designs.</p> <p>It is good to see important trees highlighted in the appraisal, which also references the need for more street trees. Trees are important for biodiversity but also to ameliorate the impact of climate change, providing some protection against flooding and urban heating. Trees also help to absorb pollutants and provide cleaner air, which can help to protect heritage sites and the health of the city's residents. Visually, trees provide attractive spaces that support well-being. For these reasons, existing street trees should be protected and opportunities for planting new street trees, especially in areas that have very few, should be sought.</p>	
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	<p>GWT represents natural heritage as part of the Gloucester Natural Heritage Forum. We would be happy to have a discussion through this forum on ways we can support in the planning and delivery of effective GI across historic sites in the city.</p>	
<p>Historic England</p>	<p>Thank you for your email of 31<sup>st</sup> October 2023, inviting us to comment on the draft Conservation Area Appraisal and Management Plan for Gloucester City Centre Conservation Area. We recognise and commend the effort taken to arrive at this stage in the process. There is much to admire in the work so far. We would like to offer some comments that may help refine and improve the emerging document.</p> <p><b>The Presentation of Information</b></p> <p>The textual presentation of the survey is thorough and presents a fairly complete understanding of the Conservation Area. However, at present the document mainly relies on written descriptions. For somebody not familiar with the area, a study biased to a textual understanding might make the document difficult to follow. We think that there is a valuable opportunity to make greater use of visual aids to support the textual narratives and assist those not used to reading Conservation Area Appraisals.</p> <p>We welcome the maps at end of the document; however, the legibility of the study could be significantly improved if it were supported graphically by way of more specific annotated maps, at appropriate places throughout the document. Below, we have detailed some of the key places that would benefit from bespoke illustrations, and we suggest what might be illustrated at each point.</p>	<p>Once the content of the appraisal document has been adopted, then a graphic designer will be consulted to advise on the presentation of the document.</p>

	<ul style="list-style-type: none"> <li>• <b>1.5 Context (regeneration initiatives)</b> <ul style="list-style-type: none"> <li>○ it would help to have a map that illustrated the relationship between the various schemes described.</li> </ul> </li> <li>• <b>2.1 Understanding the site</b> <ul style="list-style-type: none"> <li>○ it would help to have a map that illustrated the relationship between the various parts of the site described.</li> </ul> </li> <li>• <b>2.7 Historical development</b> <ul style="list-style-type: none"> <li>○ this section would benefit from a historical “map-regression” study, showing how the site evolved over time.</li> </ul> </li>   <li>• <b>Chapter 3</b> <ul style="list-style-type: none"> <li>○ Each of the areas would benefit from an annotated map, illustrating the key locations and buildings referred to in the text.</li> </ul> </li> </ul> <p>Similarly, it might help to further reconsider the hierarchy of textual and visual information being presented. The use of other graphic design strategies may further help with legibility. Such graphic design devices can help to make important observations stand out. For example: significant conclusions and critical observations might be highlighted somehow from the background text; or new proposed policies could be placed within a coloured box.</p> <p>Finally, the document would benefit from photographic examples that illustrate various points being made within the text. For example, illustrating where parts of the conservation area are clearly challenged by existing development; or, where recent interventions have worked particularly well; or, where</p>	
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	<p>there are serious threats to the character of the Conservation Area.</p> <p><b>SWOT Analysis</b></p> <p>It was a wise move to undertake the five individual SWOT analyses, one for each Character Area. However, the outcomes currently seem quite generic and do not appear to sufficiently interrogate each of the Character Areas.</p> <p>We feel that that more detailed thought could be given to each of the SWOT analyses, aiming at revealing more unique, site-specific observations under each heading of the SWOT study.</p> <p>Identifying the very particular identity and challenges of each Character Area ought to lead to a clearer understanding of any opportunities. In turn, this will suggest more focused ideas about of how to manage the various Character Areas. Such deeper interrogation will make it much easier to frame more tightly focused management policies that are likely to add most value to the whole exercise.</p> <p>This further interrogation might take a closer look at the areas that are particularly sensitive and may require special policies to protect or enhance them. Similarly, it would be helpful to identify where significant opportunities exist to accommodate change in a way that most benefits the Conservation Area. A few pertinent questions might help get this exercise started:</p> <ul style="list-style-type: none"> <li>• What is unique and valuable about this Character Area?</li> <li>• What aspects may require special protection, or specific policies?</li> </ul>	<p>Noted: A review of the SWOT analysis (using the questions suggested by Historic England) has been undertaken.</p>
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	<ul style="list-style-type: none"> <li>• What is currently the biggest threat to the Character Area?</li> <li>• Is there something lacking? ... either tangible, or intangible that could enhance the experience here?</li> <li>• Is there something negative that we would obviously want to change, if the opportunity arose?</li> <li>• What policies might encourage such opportunities to emerge?</li> </ul> <p><b>Demolition</b> On page 55, the strategy of demolition is considered:</p> <p><i>“Demolition is only likely to be permitted for the replacement of buildings identified as ‘negative’ within this conservation area appraisal.”</i></p> <p>Given the prevailing direction of sustainable development policy, it is becoming more and more likely that demolition should only ever be permitted as a final resort, where all other options for re-use have been ruled out. Perhaps the wording of this policy could be strengthened to support a stronger stance on sustainability?</p> <p><b>Townscape</b> Important Townscape views are mapped on page 61. This study is an important consideration, but probably needs expanding somewhat. It would help to see the views illustrated photographically alongside the map, with some narrative about the importance of each key view. Furthermore, it might be useful to identify more distant views that illustrate the skyline of the city. This “distant view study” could reveal the potential impact of any proposed larger developments on the Conservation Area. A suitable narrative on these key views will</p>	<p>Noted.</p> <p>Thank you for this suggestion. A distant view study will be added to this document.</p>
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	<p>help moderate future development in a way that respects, protects and enhances the Conservation Area.</p> <p><b>Working With Partners and Encouraging Appropriate Activity</b>  A successful Conservation Management Plan will seek to identify key stakeholders and find appropriate ways to work with them. Therefore, it is essential to identify the key group of partners, who are best placed to identify appropriate activities that will support the Conservation Area into the future and assist with framing the right policies to achieve this.</p> <p><b>Conclusion</b>  We hope that our comments have been helpful. We look forward to seeing the next, or final draft of the document and wish Gloucester City Council's Conservation Team well with their ongoing work.</p>	<p>Once the appraisal has been adopted, key stakeholders for example GCC - Heritage, Economic Development, City Centre Team, Housing Team etc, also BID, Solace, City Centre Commission, Historic England will be fed back to regarding the key points of the appraisal and the issues raised in the public consultation</p>
SF Planning	<p>Comments on Section 2.2 – Changes to the Conservation Area Boundary.</p> <p>Land to the North of Westgate Street (at junction with fountain Square) The Council outlines the rationale as follows; “The Dukeries is a 1960’s residential development to the northern side of Westgate Street and is outside the network of conservation areas which surround the city centre. Nos 102-106 Westgate Street stand to the east of this and are of similar period of development. Both ranges of buildings are noticeably at odds with the buildings on Westgate Street, due to their scale, mass, materiality, condition and detailing, and as such, detract from their setting. The areas of public realm, including soft landscaping and trees to the front of these buildings are an</p>	

	<p>important buffer which provide a significant piece of landscape to the streetscape, and as such it is felt that they should be protected from removal as this would have a detrimental impact on Westgate Street, as well as on the setting of St Nicholas Church This small alteration to the conservation area boundary would provide this protection."</p> <p>SF Comments: The new designation does not appear to cover the buildings themselves, only the area in front. Whilst protection of the trees which improve the visual appearance of these buildings is understandable and entirely sensible; there is a question as to whether it is more appropriate to protect the trees using a tree preservation order. This is because paragraph 191 NPPF states that; "When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest". The Council appear to be quite clear that these buildings lack historic interest and detract from the conservation area. Therefore, the designation does not appear appropriate when reviewed against paragraph 191. Also, Tree Preservation Orders are entirely appropriate to provide the protection required by the Council, for the reasons they require it. In Tree Preservation Orders: A Guide to the Law and Good Practice prepared by what was DCLG it is stated that; "3.1 LPAs may make a TPO if it appears to them to be: 'expedient in the interests of amenity to make provision for the preservation of trees or woodlands in their area' ...3.2 The Act does not define 'amenity', nor does it prescribe the circumstances in which it is in the interests of amenity to make a TPO. In the Secretary of State's view, TPOs should be used to protect selected trees and woodlands if their</p>	<p>Thank you for your comments on this issue. Its presentation will be reviewed.</p>
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	<p>removal would have a significant impact on the local environment and its enjoyment by the public." The Council should not be using the conservation area appraisal as a means of doing something which is more appropriately achieved by other means.</p>	
	<p>Comments on Section 4 – suggested guidelines and enhancements</p> <p>2.1 Comments on Section 4 – suggested guidelines and enhancements 2.1</p> <p>It is our view that Section 4 should confirm the intended status of the 'policies' outlined in that section. Our understanding is that they are to be used as guidance when making decisions on development within or affecting the conservation area which makes sense and is consistent with the use of conservation area appraisals generally. However, the language used gives the impression that they could be considered on par with local plan policies which would not be the correct approach and may confuse members of the community accessing this document. Some small changes to wording should rectify this.</p>	<p>Noted. Thank you for your comments on this issue. To avoid confusion, what were referred to in the draft appraisal as 'policies' will be amended to 'management proposals' The appraisal, one adopted will be a Supplementary Planning Document, which support policies in Gloucester's adopted City Plan.</p>
	<p>Comments relating to sections 4.1 and 4.2 are outlined below, underneath the relevant text in italics</p> <p><i>4.1.1 Development will respect the scale, design, proportions, grain, and materials of the surrounding architectural vernacular. Detailing should be characteristic of the area and retain any historic plot boundaries/ historic street layout. Development will be of a high quality design which reflects its immediate context and sits comfortably with its setting and in important views</i></p> <p>SF Comment</p>	

	<p>The requirement to retain historic plot boundaries and historic street layout should be to retain any known historic plot boundaries/street layout as the document itself confirms that this is not always clear. Should this say 'retain' important views or perhaps something similar? – the final sentence doesn't appear to make sense.</p>	<p>To add the word 'known' to this part of the text could leave as yet unidentified historic boundaries/layouts vulnerable to change which could be harmful to the character of the conservation area. This part of the text will not be amended.</p> <p>'Important views' – minor text amendment</p>
	<p><i>4.1.2 The full or substantial demolition of buildings or structures identified as making a positive contribution to the significance of the Conservation Area (including NDHAs) is harmful to the significance of Conservation Areas and will be regarded as substantial harm or less than substantial harm according to the circumstances of the case. Demolition of buildings identified in this document as making a neutral contribution to, or detracting from, the Conservation Area's special character will only be supported where there are acceptable plans for the site following demolition. Proposals which look to adapt existing buildings in some form and support the climate change agenda will be positively received. Demolition is only likely to be permitted for the replacement of buildings identified as 'negative' within this conservation area appraisal.</i></p> <p>SF Comment</p> <p>Once again this appears to be generally consistent with the aims of the conservation area designation and policies within the local plan.</p> <p>However, it is important to recognise that the protection and enhancement of existing heritage assets and their settings</p>	<p>Noted. With regard to the request of a more nuanced approach, as the</p>

	<p>should be in proportion with the significance of the asset, in accordance with both local and national policy. Therefore, the strategy advocated here should allow for a more nuanced approach, factoring in the significance of the asset and the level of contribution (i.e. the fact that some buildings make more of a positive contribution than others). The drafting should be more detailed to account for this.</p> <p>There is little to explain what constitutes substantial demolition; some brief guidance on that would assist.</p> <p>The fact that demolition of neutral and negative buildings will only be permitted if there are acceptable plans following demolition is vague. What is meant by acceptable? Does this mean a proposal which accords with local policy? Is this simply an assessment in heritage terms?</p> <p>It may also be beneficial to have different approaches for neutral and negative buildings. The wording doesn't make it clear whether buildings which 'detract from' the conservation area's special character are intended to refer to negative buildings. Our initial reading was that it intended to refer to negative buildings but then there is a separate part of the policy which refers directly to negative buildings, so some clarity would be helpful.</p> <p>The final part of the policy 'demolition is only likely to be permitted for the replacement of negative buildings' is unduly restrictive and doesn't account for where a negative building might be demolished to allow for a use which does not necessarily involve the erection of a replacement building (e.g. open space, perhaps in support of a wider scheme). We think the intention here is to clarify that the building should not be</p>	<p>document states that the level of harm will be determined on the on the 'circumstances of the case', it is not felt that this needed.</p> <p>When an application is made, it will be up to the planning case officer (in accordance with national legislation and policy, local policy and guidance and input from consultees) to determine what is acceptable.</p> <p>Noted. This part of the document will be reviewed.</p> <p>Opinions to this Management Proposal have been mixed, with other consultees suggesting that it is too lenient. A review of this proposal has been carried out.</p>
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	demolished to reduce the site to a vacant plot, but the wording could perhaps be revisited to clarify this.	
	<p>4.1.3 <i>The removal of historic boundary treatments will be resisted where there is no justifiable reason for their removal. Where new or replacement boundary treatments are required, they should use a local and traditional material palette and be of appropriate scale and design.</i></p> <p>SF Comment</p> <p>This has the potential be the source of a reasonable amount of debate in respect of individual developments. The policy should make it clear what sort of information (if any) is expected in order to demonstrate whether something is justified so the bar is set at an appropriate level which is clear from the outset.</p>	<p>Bearing in mind that the loss of historic boundary treatments is likely to detrimentally impact on the character and appearance of the conservation area, (a designated heritage asset) justification would need to be in the terms of public benefit to accord with the requirements of the NPPF, if the harm is less than substantial. (If the harm was substantial, there would be additional requirements to accord with the NPPF.</p>
	<p>4.1.4 <i>The loss of architectural features such as the removal of existing chimneys or loss of traditional windows and doors will not be supported. In addition, when undertaking repairs to traditional buildings, appropriate traditional materials and fixtures and fittings should be used, for example lime mortars and renders and cast-iron rainwater goods. The use of non-traditional materials/fixtures and fittings, for example cement-based mortars and renders, uPVC windows, and plastic rainwater goods, will not be supported. The painting or rendering of unpainted brick or stonework will not be supported. PV and thermal panels, satellite dishes, TV aerials, meter boxes and</i></p>	

	<p><i>other modern additions will not be resisted, as long as they do not impact on the character and appearance of the Conservation Area. Locating them on the rear elevations or rear roof slopes may be an option.</i></p> <p><i>SF Comment</i>  <i>This should make it clear that the loss of such features will be permitted where these make a positive contribution to the building/conservation area generally. There may be many reasons why removal of these features is appropriate and acceptable.</i></p> <p>The requirement to use traditional materials where it is feasible to do so would be appropriate (e.g. where the materials and expertise are available). Additional wording should be considered here to make that clear.</p>	<p>Thank you for your comments on this issue. The text will be reviewed and amended.</p> <p>The suggestion regarding the use of traditional materials has the potential to undermine the character of the conservation area. This section of text will not be amended.</p>
	<p><i>4.1.5 The loss of historic shopfronts or historic features will be resisted. Proposals for new shopfronts or signage must be in line with the requirements set out within the adopted Gloucester City Council guidance on shopfronts, shutters and signage or GCC Local Plan.</i></p> <p><i>SF Comment</i></p> <p>Whilst the appraisal identifies historic shopfronts in some detail, it is less clear what is meant by 'historic features'. Could more explanation be included?</p>	<p>Details of 'historic features' have been added to the text.</p>
	<p><i>4.1.6 The loss of historic elements of the public realm will not be supported. Where alterations to the public realm, or the addition of new elements/replacement items are required, they should respect the traditional materials and character of the Conservation Area and/or comply with the recommendations</i></p>	

	<p><i>within the Gloucester Public Realm Strategy (GPRS). Temporary repairs to hard landscaping which are not in keeping with original materials should be replaced on a like-for-like basis within 12 months of their installation. Major new developments which require changes to the public realm will need to comply with the GPRS and preserve or enhance the character and appearance of the conservation area. New street and traffic signage should be coordinated to avoid excessive use of new signage, including A-boards, particularly at the entrances to alleyways and back streets.</i></p> <p>SF Comment</p> <p>Whilst a clear time limit for temporary hard surfacing to be in place is welcomed, 6 months may be unduly restrictive. If the hard landscaping is within adopted highway, it may take time to obtain the necessary consents both to do the work and to temporary stop up/divert the highway. The requirement should perhaps be for reasonable endeavours to be made to replace within 6 months.</p> <p>Street signage in particular has the potential to bring benefits to the conservation area for example by outlining the history of this part of the conservation area (e.g. the historic plot markings on Westgate street) and signposting people to other historical parts of the city. If there is a specific concern with A boards, the policy could make the restriction relate to this. Street signage more generally should simply be considered on its own merits, particularly when it is unclear what is meant by 'excessive'</p>	<p>Thank you for your comment. This has been reviewed and changed to 12 months.</p> <p>That street signage can bring benefits is not disputed. However, a review of street furniture (including signage) was undertaken as a part of this appraisal and during this process it became apparent that not only was there considerable redundant signage, but also different signs performing the same function.</p>
	<p><i>4.1.7 Gloucester City Council will undertake a 5 year review of this Conservation Area Appraisal and Management Plan, updating policy as required to ensure the plan remains a useful,</i></p>	

	<p><i>relevant working document and reflects the character and appearance of the conservation area</i></p> <p>SF – No comments</p>	
	<p><i>4.2.1 The Council recommends that regular maintenance is undertaken to retain the value of the attractive traditional features present within the City Centre Conservation Area. A lack of maintenance can lead to decay, deterioration and the need for more complex and expensive repairs. Basic maintenance tasks include: • The regular clearing of debris in gutters and rainwater pipes • The pruning of vegetation near to buildings • The re-fixing of loose roof tiles or slates • The regular re-painting of timber</i></p> <p>SF comment</p> <p>These matters are mostly outside of development control, save where they relate to listed buildings or where consent is required in respect of trees or hedgerows. The Council should be clear that this policy is not intended to negate the need for necessary consent so as to avoid confusion from local people.</p>	<p>Thank you for your comments on this matter.</p>
	<p><i>4.2.2 The conversion of upper storeys from commercial use to high quality residential will be encouraged where proposals retain an active street frontage, maintain surviving historic details, and where the impact of relevant planning requirements (for example cycle provision and refuse issues) do not have a detrimental impact upon the character or appearance of the Conservation Area. Retrofitting measures which improve the thermal or energy efficiency of a building will be supported in principle. Proposals which require the loss of original fabric, or which adversely affect the setting or character of an existing building are unlikely to be accepted,</i></p>	

	<p><i>however, each proposal should be judged on a case-by-case basis.</i></p> <p>SF – No comments</p>	
	<p>4.2.3 To undertake an audit of the street furniture and street art within the conservation area with a view to its rationalisation and improved interpretation. To be repeated on a 5 yearly basis.</p> <p>SF – No comments</p>	
	<p>4.2.4 <i>To undertake a review the route of the Via Sacra and to update it in accordance with the GPRS.</i></p> <p>SF comments</p> <p>This policy is supported. We consider that more could be done to explain the route (this may fit in with the audit outlined at 4.2.3)</p>	Noted.
	<p>4.2.5 <i>To undertake a yearly review of the local list with particular regard to the City Centre Conservation Area. Current recommendations for Local Listing within the City Centre Conservation Area include the Regal and the Post Office (King's Square) and 3-5 Westgate Street.</i></p> <p>SF Comments</p> <p>Clarity on which buildings are locally listed, and the important features of those buildings is welcomed. We agree with regular updates which reflect how circumstances are changing across the city, particularly taking into account the various regeneration projects which are ongoing.</p>	Noted. A link to Gloucester's Local List has been added to the appraisal document.



<p>Housing Strategy Team</p>	<p>Section 1.1 Page 1 Para 6</p> <p>Text</p> <p><i>Consequently, it is important that this document is read in conjunction with additional guidance and local and national policy documents. Where applicable links have been provided to the documents to provide additional guidance. This appraisal forms part of the Council's Historic Environment Record and evidence base for the Local Plan</i></p> <p>Comment</p> <p>Use of living standard and building place where people want to live balanced against impact, thinking about amenity space provision as well as NDSS, How does it support SD11 mixed and balanced communities</p> <p>Section 1.6 Page 6 Para 2</p> <p>Text</p> <p>The National Planning Policy Framework (NPPF) 2021 provides national policy. Protecting and enhancing the historic environment is a key component of the NPPF's drive to achieve sustainable development.</p> <p>Comment</p> <p>See above</p> <p>Section 1.6 Page 6 Para 5</p>	<p>The focus of this document is a specific part of Gloucester's heritage, its protection and enhancement, rather than its role in specific housing policies. However, this does not mean that the guidance in this document is not supportive of SD11 when development is sensitively handled.</p>
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	<p>Policy SD8 in the Joint Core Strategy concerns the historic environment and it states that 'Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment' and that 'Designated and undesignated heritage assets and their settings will be conserved and enhanced as <i>appropriate to their significance</i>, and for their important contribution to local character, distinctiveness and sense of place...Development should aim to <i>sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation</i>'.</p> <p>Section 1.6 Page 6 Para 6</p> <p>Text</p> <p>Policy D1 of the Gloucester City Plan focuses on the historic environment; it states that '<i>Development proposals must conserve the character, appearance and significance of designated and non-designated heritage assets and their settings</i>'</p> <p>Comment No mention of enhancement – proposals can hook on too this.</p> <p>2.2 Boundary alterations</p> <p>Text</p> <p><b>Area 1 – Area of green on the northern side of Westgate Street</b></p>	<p>Noted.</p>
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	<p>The areas of public realm, including soft landscaping and trees to the front of these buildings are an important buffer which provide a significant piece of landscape to the streetscape, and as such it is felt that they should be protected from removal as this would have a detrimental impact on Westgate Street, as well as on the setting of St Nicholas Church This small alteration to the conservation area boundary would provide this protection.</p> <p>Comment</p> <p>Makes sense</p> <p>2.2 Boundary alterations</p> <p>Text</p> <p><b>Area 2 – Bearland House, Bearland Lodge, numbers 41,43,45, 47,49 Longsmith Street.</b> Bearland House and Lodge are impressive 18th century houses which, alongside numbers 41-49 Longsmith Street, are currently within the Barbican Conservation Area. It is proposed that the boundary between these two conservation areas is redrawn to bring this domestic range of buildings into the City Centre Conservation Area. It is felt that the residential nature of this range of buildings responds more to the architectural character of the City Centre Conservation Area, with its terraces of historic buildings, rather than the Barbican Conservation Area which is dominated by Gloucester Prison.</p> <p>Comment</p> <p>Makes sense</p> <p>3. Character Areas</p>	<p>Noted.</p> <p>Noted.</p>
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	<p><b>3.1 The Gate Streets</b></p> <p>With elements of the Roman, Saxon and Medieval town plan still clearly evident, in the form of the street layout, burgage plots and hidden alleyways, part of the Gate Streets character and importance lies in its historic origins and plan form. This is supplemented and enriched by the area's historic buildings, <u>whose variety and quality are exceptional.</u></p> <p>3.1.1 TOWNSCAPE CHARACTER</p> <p>Text</p> <p>Today it is an area <u>dominated by retail</u>, one that is predominantly pedestrianised, with vehicular access limited to this space for much of the day. As such part of the character within this part of the conservation area lies in the shopfronts and the activity brought by visitors, workers, and shoppers.</p> <p>Comment</p> <p>Does the plan address how this might be changed to reflect changing nature of cities and retail in particular</p> <p>Land uses Page 16</p> <p>Text</p> <p>Moves to encourage the residential use of the often vacant upper floors within parts of the character area are currently being undertaken as part of the Gloucester's Cathedral Quarter</p>	<p>The City Plan acknowledges the changing economy in the city centre, away from retail and towards other commercial and residential uses. The City Centre Conservation Area Appraisal also acknowledges this, for example in regard to its management proposal of the conversion of upper floors.</p>
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	<p>HSHAZ; the repopulation of the city centre is a wider aim of the city council.</p> <p>Comment</p> <p>s/a</p> <p>3.1.4 CONDITION AND THREATS</p> <p>Text</p> <p>Whilst the Gate Streets contain some of the most important elements within the conservation area, their condition, both in terms of the built environment and the public realm, gives cause for concern, with many buildings in a poor and deteriorating condition, a proliferation of inappropriate signage, as well poorly maintained and outdated street surfaces and furniture. Whilst the current HSHAZ scheme has provided some funding to assist owners of buildings in Westgate Street to repair and restore their buildings, and to enable the conversion of upper floors to residential use, many buildings remain within the Gate Streets that are in need of repair and maintenance. The number of vacant premises in this character area, especially at ground floor level, exacerbates this concern.</p> <p>Comment</p> <p>Residential alongside patient investors need to be seen as an opportunity</p> <p>Character Area SWOT s</p> <p>Text</p>	<p>Noted.</p>
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	<ul style="list-style-type: none"> <li>• The Gate Streets</li> <li>• Brunswick Road, Greyfriars and Eastgate</li> <li>• Quay Street, Longsmith Street and Ladybellegate Street</li> <li>• King's Square and King's Walk Character Area</li> </ul> <p>Opportunities Ensure high quality new development that is sensitive to the historic city centre</p> <p>Threats Increasing number of vacant premises – shops and upper floors</p> <p>Comment A generic approach to opportunities could a more granular approach better steer development ie focus on HSAZ to create resi. What does high quality mean – nb comments re living standards, is there a tension between achieving high quality livings standards eg amenity space NDSs and EPC ad heritage. NB threat can be viewed as an opportunity, more resi. Will create more demand for services and retail.</p> <p>4. Guidelines and enhancements</p> <p>Text The principal aim of the <b>following policies</b> is the preservation or enhancement of the character and appearance of the City Centre Conservation Area, which will be brought about through the sensitive conservation of its historic elements, combined with positive change and regeneration where required.</p> <p>Comment</p>	<p>Noted.</p>
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	<p>Policy or guidance?</p> <p>4.1.1 Development Proposals:</p> <p>Text  Aim: Development proposals will preserve or enhance the City Centre Conservation Area's character and appearance and conform to local policies as outlined in section D1 of the Gloucester City Plan</p> <p>Comment  Policy: Development will respect the scale, design, proportions, grain, and materials of the surrounding architectural vernacular. Detailing should be characteristic of the area and <b><u>retain any historic plot boundaries</u></b>/ historic street layout. Development will be of a high-quality design which reflects its immediate context and sits comfortably with its setting and in important views</p> <p>How is this balanced against other policies and regulation lacking any wiggle room vis a vis different heritage values</p> <p>4.1.2 Demolition of Buildings</p> <p>Text  Aim: To ensure the significance of the Conservation Area is preserved and that any future development enhances its existing positive characteristics. Policy: The full or substantial demolition of buildings or structures identified as making a positive contribution to the significance of the Conservation Area (including NDHAs) is harmful to the significance of Conservation</p>	<p>Noted. This will be reviewed.</p> <p>Historic boundary treatments are features that usually make a positive contribution to the character and appearance of the conservation area, (a designated heritage asset). If their removal impacts on this, then as in cases of harm to designated heritage assets, the harm would need to be balanced against the public benefits of the proposals. (This is in cases of less than substantial harm. If the harm was substantial, there would be additional requirements to accord with the NPPF.)</p>
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	<p>Areas and will be regarded as substantial harm or less than substantial harm according to the circumstances of the case. <u>Demolition of buildings identified in this document as making a neutral contribution to, or detracting from, the Conservation Area's special character will only be supported where there are acceptable plans for the site following demolition.</u> Proposals which look to adapt existing buildings in some form and support the climate change agenda will be positively received. Demolition is only likely to be permitted for the replacement of buildings identified as 'negative' within this conservation area appraisal.</p> <p>Does this creates a risk that buildings will not be refurbished</p> <p>4.1.3 Boundary Treatments</p> <p>Text  Aim: Development proposals will preserve historic boundaries; new boundary treatments will be harmonious with surviving historic examples. Policy: The removal of historic boundary treatments will be resisted where there is no <u>justifiable reason for their removal</u>. Where new or replacement boundary treatments are required, they should use a local and traditional material palette and be of appropriate scale and design.</p> <p>Comment  Potentially will limit enhancements that would create better living standards, what is a justifiable reason?</p> <p>4.2.2 Sustainability</p> <p>Text</p>	<p>It is not believed that it will.</p> <p>See response to SF planning above.</p>
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	<p>Regeneration Aim To offer increased residential opportunities within the city centre through the conversion and reuse of upper floors where appropriate. Enhancement Policy: The conversion of upper storeys from commercial use to high quality residential will be encouraged where proposals retain an active street frontage, maintain surviving historic details, and where the impact of relevant planning requirements (for example cycle provision and refuse issues) do not have a detrimental impact upon the character or appearance of the Conservation Area. Retrofitting measures which improve the thermal or energy efficiency of a building will be supported in principle. Proposals which require the loss of original fabric, or which adversely affect the setting or character of an existing building are unlikely to be accepted, however, each proposal should be judged on a case-by-case basis</p> <p>Comment</p> <p>What does high quality mean?</p> <p>Can we take a progressive approach to street storage of bicycles?</p> <p>This may be problematic in terms of thermal efficiency – what are the possible solutions here to retain fabric but improve performance (technical appendix?)</p>	<p>In this instance it refers to development that is sensitive to its context, and which provides a good standard of accommodation.</p> <p>All proposals will be dealt with on their own merits.</p> <p>It does not need to be, retrofitting can be undertaken in a sensitive manner.</p>

