

An aerial photograph of a street scene in Gloucester, featuring a row of brick buildings. A semi-transparent blue oval highlights a specific building. A black dot is placed on the building, with a line connecting it to the text label.

● Imperial Chambers, Gloucester



Contents / Brief

Site Analysis /Appraisal

Site Photographs

Planning Guidance

Redevelopment Options

Conclusion

IMPERIAL CHAMBERS, 41-47 LONGSMITH STREET, GLOUCESTER, GL1 2HT

BRIEF

This document has been prepared by Barton Willmore on behalf of Citicourt Investment Partners Limited in response to the Project Briefing Meeting held on Wednesday, 23 March 2005. A subsequent site visit was made by Nigel Normington on 13 April 2005 to identify key site constraints and opportunities with the site boundary confirmed by the client on 24 May 2005.

The initial brief requests an analysis of Imperial Chambers, Gloucester (and adjacent vacant land areas), it's context, constraints, future opportunities and identify the potential design principles for the site.

The primary objectives of this redevelopment feasibility report were initially established as:

- Analysis and appraisal of the site and adjacent land and properties.
- Surrounding land context and constraints impacting on the site.
- Examine and appraise the planning history for the site and current planning guidelines and legislation at national, regional and local levels with regard to redevelopment of the site.
- Identify potential general design principles and concepts for the site for future discussion with letting agents and client.
- Identify specific future redevelopment options for both the existing building and general site, including possible expansion and alternative use for the existing building.
- Examine options for current and future tenants and alternative letting opportunities.

Specific objectives identified for site:

- Examine options for refurbishment into residential units within existing building structure and fabric.
- Rationalise internal and external layouts and levels for site to maximise potential for residential and office use including access and parking provision.

Initial planning guidance was provided by Tim Burden (Barton Willmore – Planning), tel: 0118 943 0105.

This report has been prepared incorporating all information available at the present time and should be considered an initial appraisal of the site and its future potential leading to future detailed design analysis and investigations by other consultants where identified and appropriate.



Contents / Brief

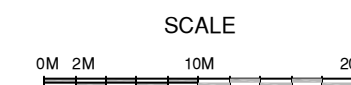
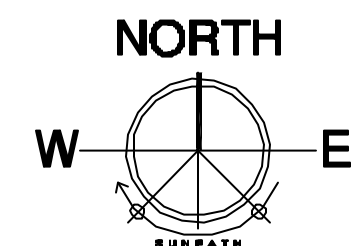
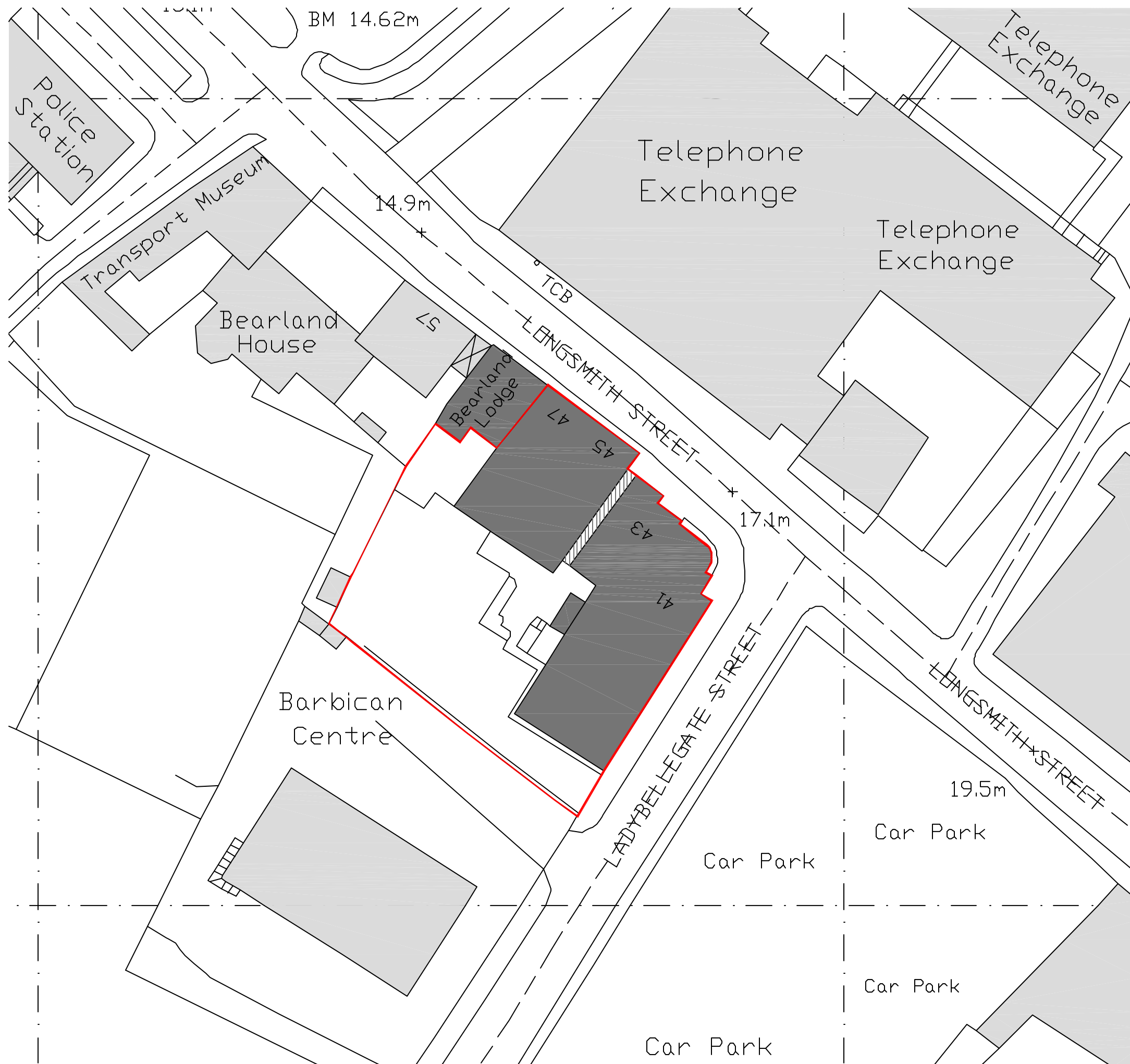
Site Analysis /Appraisal

Site Photographs

Planning Guidance

Redevelopment Options

Conclusion



DRAWING BASED ON O.S. BASE RECEIVED 19.05.05

Project
IMPERIAL CHAMBERS
GLOUCESTER

Drawing Title
Site Plan

Date
May 2006

Scale
1:500 @ A3

Drawn by
AB

Project No
13814

Drawing No
SK001

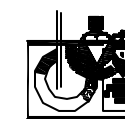
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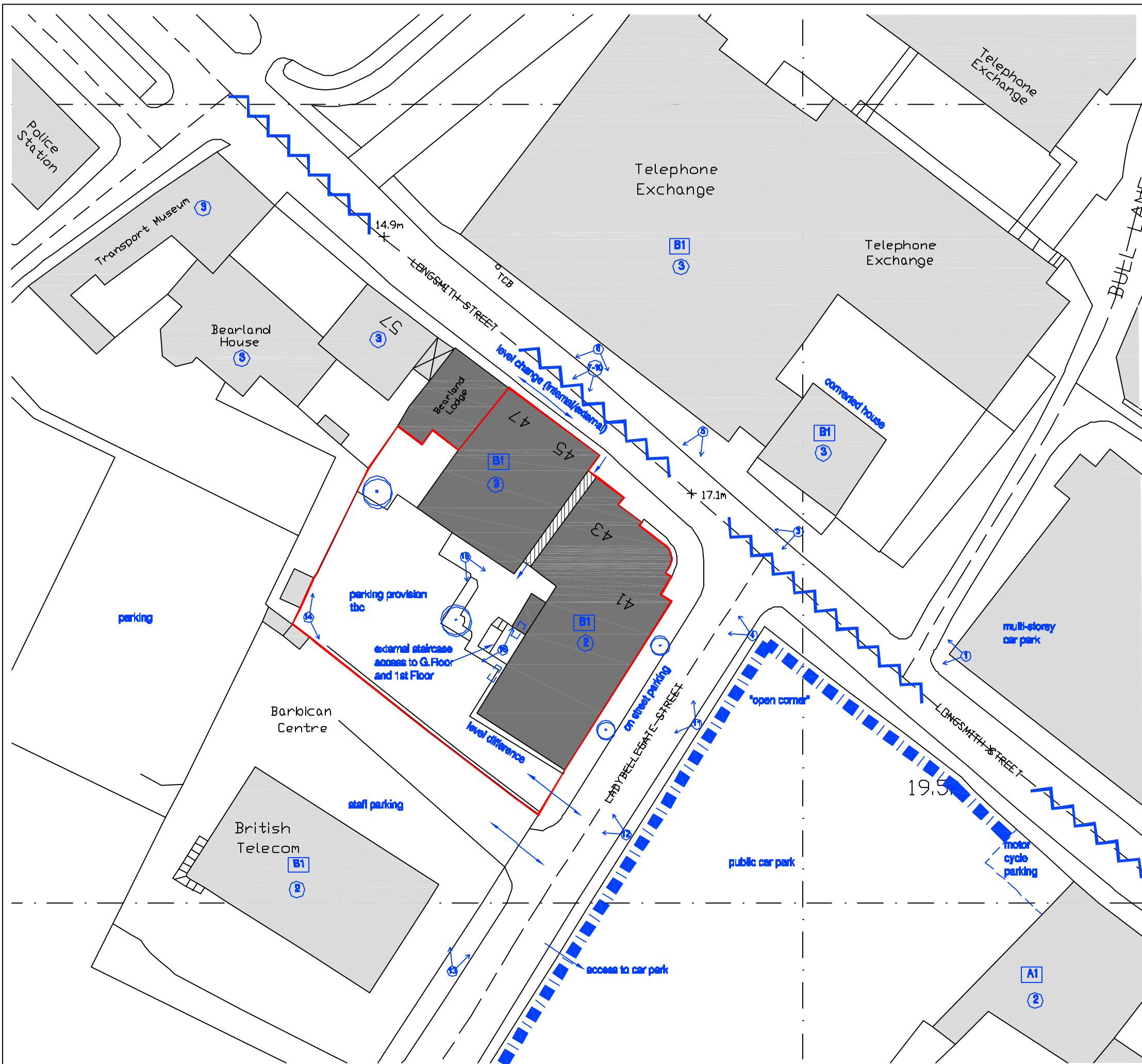
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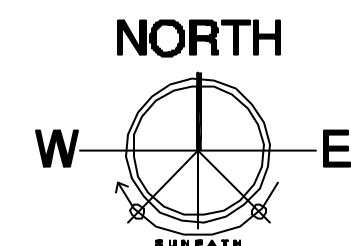
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- Key ;**
- A? Use class
 - 3 Storey height
 - ? Photo reference point
 - * Air conditioning/services plant location - TBC
 - Legal Boundary
 - ~ Possible noise/traffic source

- Notes;**
- * Parking - provision for site use
 - * Building area & internal arrangements - tbc
 - * 41-43 located approx half level above 45-47. Levels TBC
 - * Site Area 0.15 ha



DRAWING BASED ON O.S. BASE RECEIVED 19.05.05
LEGAL DRAWINGS RECEIVED FROM CLIENT DATED 24.05.05
AND SITE VISIT BY N. NORMINGTON 13TH APRIL 2005

Project
IMPERIAL CHAMBERS
GLOUCESTER

Drawing Title
Site Analysis and Appraisal

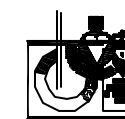
Date May 2006	Scale 1:500 @ A3	Drawn by AB
Project No 13814	Drawing No SK002	Revision

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Contents / Brief

Site Analysis / Appraisal

Site Photographs

Planning Guidance

Redevelopment Options

Conclusion



1



2



3



4

Project
Imperial Chambers
Gloucester
Drawing Title
Site Photographs
Sheet 1 of 5

Date April 2005	Scale -	Drawn by MS
Project No 13814	Drawing No 001	Revision -

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5



6



7



8

Project
Imperial Chambers
Gloucester
Drawing Title
Site Photographs
Sheet 2 of 5

Date	Scale	Drawn by
April 2005	-	MS
Project No	Drawing No	Revision
13814	002	-

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9



10



11



12

Project
Imperial Chambers
Gloucester
Drawing Title
Site Photographs
Sheet 3 of 5

Date April 2005	Scale -	Drawn by MS
Project No 13814	Drawing No 003	Revision -

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13



14

Project
Imperial Chambers
Gloucester

Drawing Title
Site Photographs
Sheet 4 of 5

Date April 2005	Scale -	Drawn by MS
Project No 13814	Drawing No 004	Revision -



15



16

Project

Imperial Chambers
Gloucester

Drawing Title

Site Photographs
Sheet 5 of 5

Date

April 2005

Project No

13814

Scale

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Drawing No

005

Drawn by

MS

Revision

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Contents / Brief

Site Analysis /Appraisal

Site Photographs

Planning Guidance

Redevelopment Options

Conclusion

IMPERIAL CHAMBERS, 41-47 LONGSMITH STREET, GLOUCESTER, GL1 2HT

PLANNING GUIDANCE

Introduction

Imperial Chambers (41-47 Longsmith Road) is located on a prominent corner plot within the Blackfriars area of Gloucester, close to the town centre. The site falls within the designated Settlement Policy Boundary of Gloucester, and is in a highly sustainable location, close to town centre facilities and job and shopping opportunities. We understand that the properties are not listed and do not fall within a conservation area. Indeed, the site falls within a designated mixed use allocation totalling some 100 hectares in the emerging Local Plan.

Relevant Planning History

A search of the Council's website indicated that the most recent planning applications relate to an outline office application in 1973 and air conditioning units. There appears to be no relevant planning history after this date.

25329 (P/40/73):-	(OUTLINE) OFFICE DEVELOPMENT (41-45)
25329 (P/129/73):-	STATIONING OF INSULATED REFRIGERATED CONTAINER
25329 (P/129/73/74):-	STATIONING OF SECOND INSULATED REFRIGERATED CONTAINER

PLANNING POLICY

PPG3 'Housing' (March 2000)

PPG3 maintains that in order to promote more sustainable patterns of development and make better use of previously-developed land, the focus of additional housing should be existing urban areas. Of particular relevance to the redevelopment of the site are paragraphs 21 and 22, set out below:

"Government is committed to promoting more sustainable patterns of development, by:

- **concentrating most additional housing development within urban areas;**
- **making more efficient use of land by maximising the re-use of previously-developed land and the conversion and re-use of existing buildings;**
- **assessing the capacity of urban areas to accommodate more housing;**

- adopting a sequential approach to the allocation of land for housing development;
 - managing the release of housing land; and
 - reviewing existing allocations of housing land in plans, and planning permissions when they come up for renewal.
22. **The Government is committed to maximising the re-use of previously-developed land and empty properties and the conversion of non-residential buildings for housing, in order both to promote regeneration and minimise the amount of greenfield land being taken for development."**

PPG3 emphasises the Government's commitment to the re-use of urban land for housing provision in order to both promote regeneration and minimise the amount of greenfield land being taken for development. At paragraph 23 it states that the national target is that by 2008, 60% of additional housing should be provided on previously developed land. Paragraph 31 discusses the sequential test for site identification, providing a list of criteria against which a site should be assessed to establish its suitability and potential:

- "• the availability of previously-developed sites and empty or under-used buildings and their suitability for housing use;**
- the location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving such accessibility;**
- the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure;**
- the ability to build communities to support new physical and social infrastructure and to provide sufficient demand to sustain appropriate local services and facilities; and**
- the physical and environmental constraints on development of land; including, for example, the level of contamination, stability and flood risk, taking into account that such risk may increase as a result of climate change."**

Of key relevance to the proposals are paragraphs 41 and 50 which refer to the re-use of existing buildings and conversions. Paragraph 41 states that:

"Conversions of housing, buildings formerly in other uses and the upper-floor space over shops, can provide an important source of additional housing, particularly in town centres. Local planning authorities should adopt positive policies to:

- identify and bring into housing use empty housing, vacant commercial buildings and upper floors above shops, in conjunction with the local authority's housing programme and empty property strategy and, where appropriate, acquire properties under compulsory purchase procedures; and
- promote such conversions, by taking a more flexible approach to development plan standards with regard to densities, car parking, amenity space and overlooking."

Paragraph 50 states that local planning authorities should facilitate mixed-use development by:

- "- encouraging more housing, including affordable housing, in town centres by, for example, converting space above shops and vacant commercial buildings;
- identifying appropriate sites in development plans;
- preparing development briefs for sites likely to become available for development;
- assembling sites for redevelopment; and
- adopting flexible planning standards for car parking and density which facilitate such developments."

Paragraphs 54 to 56 encourage developers and local authorities to think imaginatively about layouts and design in order to make the best use of previously developed land. They are also encouraged to consider proposals within the wider context, and to take a flexible approach to planning standards, and to create places and spaces with the needs of the people in mind which have a distinctive identity whilst respecting the character of the area.

In January 2005, the government published an "Update to PPG 3: Housing: Supporting the Delivery of New Housing". This introduced a new paragraph 42 (a) of PPG3 is as follows:

"42(a) Local planning authorities should consider favourably planning applications for housing or mixed use developments which concern land allocated for industrial or commercial use in saved policies and development plan documents or redundant land or buildings in industrial or commercial use, but which is no longer needed for such use, unless any of the following apply:

- the proposal fails to reflect the policies in this PPG (including paragraph 31), particularly those relating to a site's suitability for development and the presumption that previously-developed sites (or buildings for re-use or conversion) should be developed before greenfield sites;
- the housing development would undermine the planning for housing strategy set out in the regional spatial strategy or the development plan document where this is up-to-date, in particular if it would lead to over-provision of new housing and this would exacerbate the problems of, or lead to, low demand;

- it can be demonstrated, preferably through an up-to-date review of employment land¹ (refer to Annex D for practice guidance), that there is a realistic prospect of the allocation being taken up for its stated use in the plan period or that its development for housing would undermine regional and local strategies for economic development and regeneration.”

PPG13 'Transport' (March 2001)

PPG13 echoes the principles of PPG3. It identifies accessibility to jobs, shopping, leisure facilities and services via public transport, walking, and cycling as a key objective. It also seeks to reduce the need to travel, especially by private car. In order to do this, the guidance states that housing should be accommodated principally within existing urban areas.

Paragraph 21 states that Local Planning Authorities should seek to make maximum use of the most accessible sites, while paragraph 14 reiterates paragraph 31 of PPG3 by advocating a sequential approach to site allocation and development, starting with the re-use of previously developed land and buildings within urban areas.

GLOUCESTERSHIRE STRUCTURE PLAN (ADOPTED 17 NOVEMBER 1999).

The current approved version of the Structure Plan is the Second Review, adopted by the County Council on 17 November 1999. However the Plan is kept under continuous review with the Third Alteration currently underway. The Deposit Draft containing revised and new policies and explanatory memoranda concluded a 6-week period of public consultation on 10 March 2003.

The Structure Plan Advisory Policy Panel (SPAPP), comprising elected councillors (Members of the County Council), will continue to advise the Portfolio Holder (SPAPP has now been re-named as the Structure Plan Cabinet Panel). The Cabinet and County Council will continue to oversee progress on the Plan to its finalisation and adoption. On 14th May 2003, SPAPP discussed a summary of the Response Report. This was also considered by Scrutiny Committee on the same day. A full report on the pre-Examination in Public (EIP) changes to the policies of the Structure Plan was considered by Cabinet on 4th June and approved to go forward to the Examination in Public (EIP) at the meeting of full Council on 25th June 2003.

These changes were publicly available for a six week period closing on August 22nd 2003, and the Examination in Public commenced on November 25th 2003. Following the conclusion of the EIP, the Panel issued their Report to the County Council March 31st 2004. In light of this Report and comments made to the Pre-EIP changes, the County Council prepared Proposed Modifications to the Plan. The Proposed Modifications have gone to Scrutiny (July 7th 2004), Structure Plan Advisory Policy Panel (July 13th 2004), Cabinet (July 14th 2004) and County Council (July 22nd 2004).

The Proposed Modifications were on public consultation from Thursday 16th September to 5pm Thursday 28th October 2004. The Proposed Second Modifications to the Structure Plan were out on public consultation from 17 February to 31 March 2005. The papers in relation to the Proposed Second Modifications went to Cabinet on 20th December 2004 and to the County Council meeting on 26th January 2005.

On 1st April 2005, the County Council received a Direction from the Secretary of State regarding policies SC.2, SC.3 and SD.9 of the Structure Plan. A decision as to the next stages the County Council will take is currently awaited. For the purposes of this appraisal the adopted Structure Plan policies have been considered as these should be afforded most weight in the decision making process.

Residential Development

Policy H.1 states that provision should be made for about 50,000 new dwellings in the County between 1991 and 2011. **Policy H.2** states that Gloucester will provide about 10,250 dwellings during the Plan period.

Policy H.4 states that most residential development will be provided in the Central Severn Vale. Development should be provided in locations where employment, leisure, commercial and community facilities can be integrated and where there are opportunities to maximise the use of public transport. In providing for residential development priority will be given to development within Gloucester and Cheltenham and then to locations adjacent or close by which are or can be easily and conveniently accessed by means of transport other than the private car.

Policy H.8 states that provision should be made for a range of dwellings in terms of location and size to meet local requirements. **Policy H.9** states that provision should be made for residential densities at a level which makes the best use of land consistent with environmental considerations.

Affordable Housing

Policy H.7 states that provision should be made to meet the needs of those unable to compete in the housing market. Such provision should meet a demonstrable local need and any housing so provided should be available to successive occupiers who need affordable accommodation.

Existing Employment Sites

Policy E.5 states that existing employment sites will be safeguarded for employment use except where the site is not required to meet existing or future employment needs, where employment use creates unacceptable environmental or traffic problems, or an alternative use or mixed-use development would offer local community benefits which outweigh the loss of the employment use.

Paragraph 7.2.7 of the adopted Structure Plan states that the Government's preference for the use of urban and brownfield land for housing development must not be at the expense of other employment and economic objectives of the Plan. Employment sites should be safeguarded in local plans to maintain confidence in local economies, to promote investment and stimulate new activities and economic regeneration. Only where it can be demonstrated that a site is not required for existing or future employment needs, its local environmental impact is unacceptable or the advantages of alternative development would outweigh any loss, should existing employment sites be lost to other uses.

Policy E.6 regarding safeguarding employment land states that land designated or committed for employment use should not be used for retail or other development where it would limit the range and quality of available employment sites. Paragraph 7.2.8 states that provision for employment over the Plan period will require that land is allocated or reserved possibly some time in advance of it being required for development. Given the need to provide a range of sites in terms of location and size, local plan policies should seek to protect land designated or committed for employment use from other uses where this would impair the provision for future employment needs.

Transport

Policy T.1 advises that new development should be located so as to minimise the length and number of motorised journeys, and encourage the use of public transport, cycling and walking. New development should be genuinely accessible by these modes of transport as alternatives to the car.

Policy T.2 states that walking will be promoted by the development of a network of safe and convenient pedestrian routes, and by the provision of traffic-calming, pedestrian priority and traffic-free areas. The needs of people with impaired mobility will be fully taken into account. **Policy T.3** states that cycling will be promoted by the development of a comprehensive network of safe and convenient cycle routes, defined where appropriate in local plans, and by the provision of secure cycle parking in town and local centres, at public transport interchanges, and in appropriate new developments.

Policy T.8 sets out standards for car-parking provision in new development, co-ordinated on a County-wide basis, should be defined in local plans, and based on the following strategic principles:

- “• **minimum car-parking requirements should be set at the level necessary for the development to function operationally;**

- maximum limits on car-parking provision should be set in order to discourage reliance on the car and promote the use of alternative modes of transport;
- maximum limits should be broadly similar across the County in order to avoid peripheral areas gaining advantage over more central areas, or one centre gaining advantage over another; and
- the level of parking provision at new development should be determined with reference to the minimum requirements and maximum limits, and the accessibility of the development by modes of transport other than the car, taking into account any improvements in accessibility secured under the provisions of Policy T.1."

GLOUCESTER CITY COUNCIL SECOND STAGE DEPOSIT LOCAL PLAN 2002

Following consideration of the comments that were submitted at the First Deposit stage, a Second Deposit Draft Local Plan was published by the Council in August 2002. We understand that this document is being used for development control purposes.

Residential development and design policies

Policy H.1 of the Second Deposit Draft Local Plan sets out a number of Allocations for Mixed Use Including Housing. It advises that prior to the granting of any planning permission for development on these sites a comprehensive development brief, including where appropriate the safeguarding of the development potential of any adjacent site, must have been approved by the City Council. A Section 106 Legal Agreement for each development or part of the development will be sought to secure the planning obligations required by other policies in this Plan, the site specific requirements set out below, and any others that arise through the consideration of planning applications:

The appraisal sites falls within the boundary of **Site MU2 (Western Waterfront)** as designated under policy H.1, which has a total area of approximately some 100 hectares. The allocation is for a mixed use development to include residential, employment, retail, education, leisure, hotels, culture, community facilities and services, open space, public car parking and tourist coach parking. The policy states an indicative capacity of 2000 dwellings of which 1500 expected by mid-2011.

The policy sets out a number of site specific obligations:-

- A comprehensive development brief for the character area (as shown on the Proposals Map) in which a proposed development is located. Re-location of bad neighbour uses where appropriate;
- Contributions to infrastructure improvements in the area;
- A contribution towards the provision of centralised residents' parking where appropriate;
- Provision of, or contribution towards the provision of, open space within the Western Waterfront area;
- Provision of a canalside footpath and cycleway, including, if feasible, a bridge across the entrance of Monk Meadow Dock.

Although the Council have not prepared a development brief for this site yet, any development should ensure that it does not prejudice the Council's overall comprehensive development opportunities for the surrounding area and positively contributes to the redevelopment of the area.

Policy H.5 refers to the use of Upper Floors for Residential. It states that the City Council will encourage and permit the use of the upper floors of commercial buildings for residential use in the Central Area, and in the district and local centres designated in the Plan. **Policy H.6** states that housing will be expected as part of the mix of uses in all significant development proposals in the Central Area, and shall be appropriately soundproofed to minimise potential for conflict with the other uses within the development.

Policy H.7 sets out the Council's criteria in relation to Housing Density and Layout. It states that the City Council will expect housing layouts to make best use of land and will seek densities that:

- 1) are consistent with the mix of dwelling types appropriate for a site and the character of the locality,
- 2) protect the amenities of adjoining properties, and
- 3) create high quality environments for residents.

It states that layouts that fall below a net density of 30 dwellings to the hectare will be refused. In layouts which include dwellings without private gardens, good quality shared space will be expected of a suitable size and design, to include where appropriate, Private Space for Play for infants.

Policy H.8 states that on housing sites the City Council will seek a mix of house sizes and types to meet local needs and build balanced communities. Account will be taken of the existing mix in the locality of the site and of evidence of local housing needs and demand at the time of the application.

Policy BE.4 relating to criteria for the Layout, Circulation and Landscape of New Development states that the City Council will permit development if it satisfies the following criteria:

- 1) Good pedestrian, cyclist and vehicular integration with the surrounding district and with the Central Area;
- 2) Where appropriate contributes to the open space network;
- 3) All areas within the site have a clear function and meet the needs of users;
- 4) The scale and design of buildings relates well to the spaces they enclose or face;
- 5) Landscape schemes are integrated into the development and provide sufficient space to allow existing and proposed trees, shrubs and other planting to flourish and mature;
- 6) All public spaces are of sufficient size to comfortably accommodate any planting, street furniture, public art or signs without impeding pedestrian movement;
- 7) Avoids small leftover areas of public space with no clear functional use;

- 8) Landscape schemes take up any opportunity for linkage to existing and neighbouring planting thus creating routes and habitats for wildlife;
- 9) The routes and spaces for pedestrians, cyclists and people with disabilities are safe, secure, convenient and suitable for use at all times;
- 10) All ancillary facilities, such as bin stores are integrated unobtrusively into the design;
- 11) There will be adequate daylight and sunlight into and between buildings.

Policy BE.17 sets out Design Criteria for Large Scale Residential Development. It states that the City Council will permit development if it satisfies the following criteria or a variation is agreed:

- 1) There is a clearly articulated design concept demonstrating that the development will complement the existing positive character of the area or create a distinct identity which contributes to the character of the city;
- 2) The average density is at the maximum that is feasible given the site constraints, need and impact on the local area, Criterion 4 below and the density policy (Housing policy H.7);
- 3) In addition to housing there is a mix of other uses that support sustainability;
- 4) A range of housing types and tenures are provided, suitable to the size of the site and its location;
- 5) All dwellings have an attractive outlook and receive adequate daylight and sunlight, and all existing or proposed dwellings are not subjected to unacceptable overlooking effects or overbearing massing effects;
- 6) Private rear gardens should back on to each other and wherever possible dwellings shall face onto public places.
- 7) The front of properties are enclosed by low walls, railings, fences, hedges or gates or an appropriate combination of these to provide defensible space;
- 8) Private external spaces have gates to prevent unauthorised access;
- 9) Service access and refuse storage/ collection points are located to minimise nuisance to occupiers of nearby property;
- 10) Sufficient space is allowed for landscape schemes which include large scale trees

Policy BE.18 relates to vehicular circulation and parking in new residential development. It states that in providing for vehicle circulation and car parking in new residential development the design of the scheme should ensure that:

- 1) The land taken for vehicle access, circulation and parking is minimised;
- 2) Roads, cycleways and pavements are logically linked to the adjoining road network;
- 3) Where provided, garages are of a size and design to encourage regular and convenient use for car parking;
- 4) Covered storage provision is made for two bicycles per dwelling;
- 5) The means of calming traffic do not detract from the character of the street scene;
- 6) Parking areas are overlooked and located close to or within the curtilage of a dwelling with direct access from each property wherever possible;

- 7) Pavements are constructed to an adoptable standard, are well lit, have an easy surface to walk on for all members of society, and are over-looked from within homes.

Affordable Housing

Policy H.15 advises that the City Council will seek the provision of an element of affordable housing on new housing sites of 15 or more dwellings or 0.5 of a hectare or larger, irrespective of the number of dwellings and will seek an overall target of 40% of the net site area. The amount of affordable housing will be negotiated on the basis of site and market conditions at the time of application and may exceed 40% in some cases. In some cases abnormal costs of development will need to be taken into account which may reduce the affordable housing requirement.

Policy H.16 advises that the City Council will seek a range of house sizes and densities to provide a mix of affordable housing to meet local needs, designed to a high standard that makes them well integrated with neighbouring open market housing. In larger housing schemes, affordable housing should be well distributed across the development site and not segregated from the open market housing.

Employment sites

Policy E.5 states that existing employment sites will be safeguarded for employment use except where the site is not required to meet existing or future employment needs, where employment use creates unacceptable environmental or traffic problems, or an alternative use or mixed-use development would offer local community benefits which outweigh the loss of the employment use.

Supporting paragraph 7.2.7 states that the Government's preference for the use of urban and brownfield land for housing development must not be at the expense of other employment and economic objectives of the Plan. Employment sites should be safeguarded in local plans to maintain confidence in local economies, to promote investment and stimulate new activities and economic regeneration. Only where it can be demonstrated that a site is not required for existing or future employment needs, its local environmental impact is unacceptable or the advantages of alternative development would outweigh any loss, should existing employment sites be lost to other uses.

Policy E.6 states that land designated or committed for employment use should not be used for retail or other development where it would limit the range and quality of available employment sites. Paragraph 7.2.8 states that provision for employment over the Plan period will require that land is allocated or reserved possibly some time in advance of it being required for development. Given the need to provide a range of sites in terms of location and size, local plan policies should seek to protect land designated or committed for employment use from other uses where this would impair the provision for future employment needs.

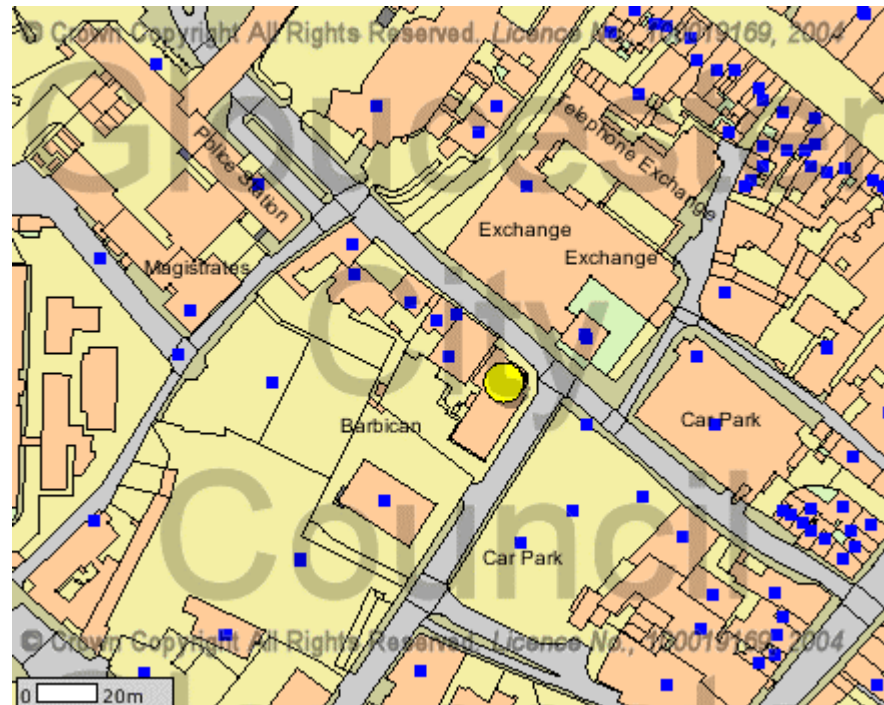
Maximum Car Parking and Cycle Standards

The emerging Local Plan states that for dwelling houses and flats an average of 1.5 parking spaces should be provided with 2 cycle spaces provided per dwelling.

Employment Monitoring March/April 2004

Gloucester City Council annually monitors the amount of available, committed, and planned employment land and its associated take up within the city. The results from the latest April 2004 study show that there is a deficit of employment land in Gloucester compared to the structure plan employment land target. As such, the Council consider that it is necessary for them to protect and enhance its stock of employment land in order to preserve a vibrant local economy. The monitoring report advises that the relationship of Future Total Employment Land Supply to Structure Plan Requirement shows a deficit of -32.79 hectares.

An extract of the emerging Gloucester Local Plan (2nd deposit draft)
Map showing the appraisal site is attached below:



Prospects of achieving residential development on the site

The prospects of achieving a residential consent on this site are considered to be good. The site is in a sustainable location, with good public transport links, and access to employment opportunities and shops. It is also designated under policy H1 for a mixed use development including up to 2,000 dwellings across the whole allocation. The conversion and redevelopment of the existing offices would therefore appear to comply fully with the mixed use allocation under Local Plan policy H1 and national planning guidance contained in PPG3 (Housing) at paragraphs 21, 22, 41 and 50. However, consideration should be given to the timing of taking this site forward, as it may be preferable for it to come forward with any wider development proposals for the allocation, rather than on its own. There is of course a possibility that in the interests of a comprehensive redevelopment of the allocation, the Council could compulsory purchase land if required.

It is considered that there are a number of issues that would need to be further examined in order to achieve a residential consent at the site. It is considered that in principle the existing building could be converted into a number of self contained dwellings. It is clear however that although the site may in principle be suitable for residential use, the Council is likely to resist the loss of the B1 office space at the site. This is reinforced by the strongly worded policies E.5 and E.6 of the emerging plan as set out above.

It is however noted that recent guidance in PPG3 at paragraph 42 (a) should supersede the wording of this policy and places the emphasis on the Council through the commissioning of up to date employment land surveys to justify why a commercial use should not be developed for housing. Nonetheless, it appears that the Council may still strongly resist the loss of this office space, and it is suggested that an appropriate marketing / office availability report is commissioned from an appropriate consultant to examine office supply in the City in order to justify that the loss of this site would not undermine the Council's overall employment land strategy.

The site also currently has significant built form covering much of its area, with parking located to the rear. It will therefore be necessary for any conversion to strive to provide an appropriate level of car parking and amenity space provision, and it is likely that some element of commuted sums would be required to meet any shortfall given the constrained nature of the site and town centre location.

Further liaison is needed with Gloucester City Council to ascertain whether the Council would seek an affordable housing contribution on this site. It is however considered that under the guidance of Circular 1/97 the Council is unlikely to be seek a contribution for any scheme of 14 units or less.

Conclusions

It is considered that the introduction of further residential development in Gloucester town centre would positively contribute towards the areas vitality and viability, and in principle should be supported by the Council. However the fundamental issue of the loss of employment space will need to be overcome in order to allay any concerns that the Council may have in this regard.

Recommendations

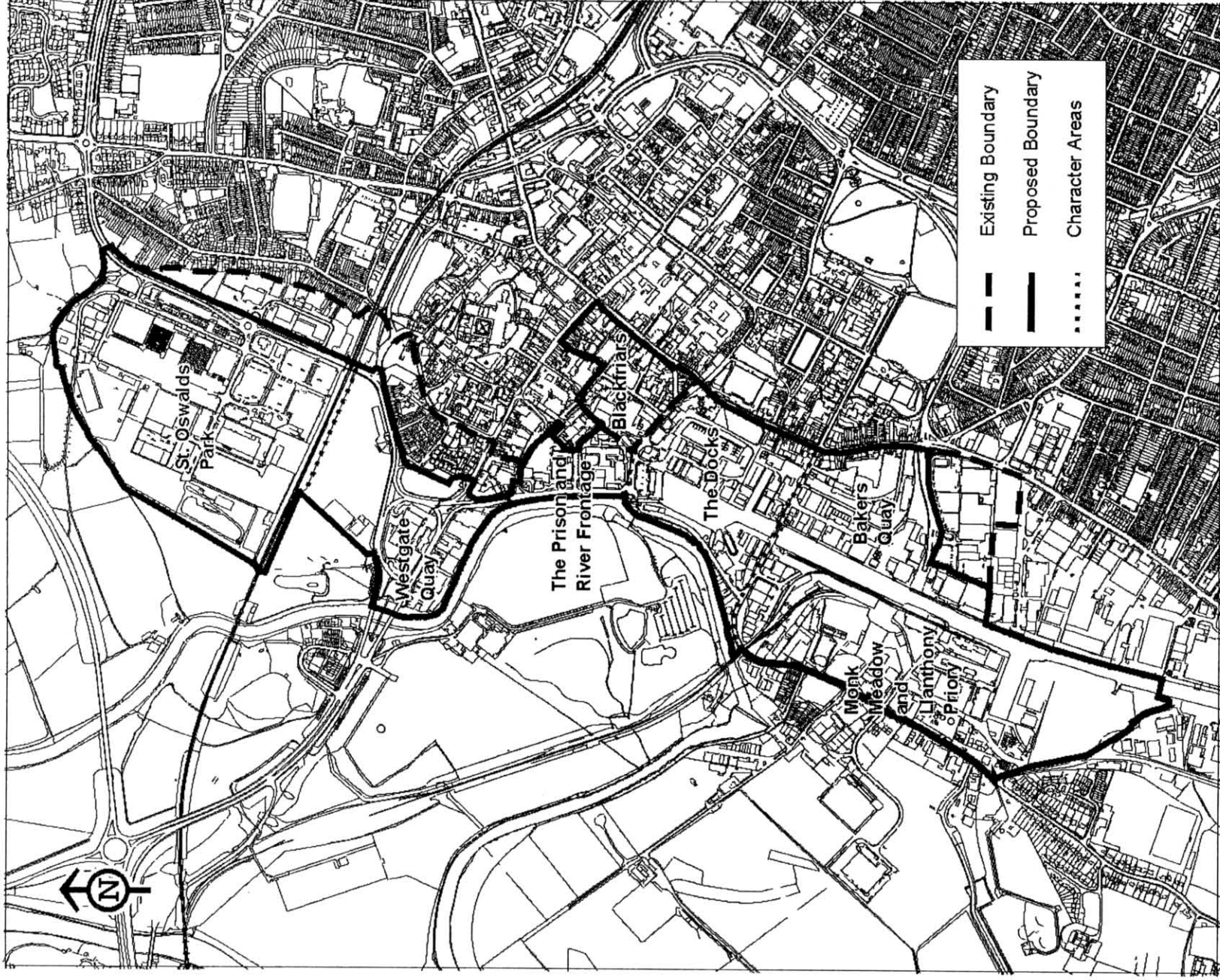
- 1) Consideration should firstly be given to the timing of any redevelopment of the site, taking into account the emerging site allocation. Further to this, as it is considered that the principle of residential conversion of this site is acceptable, it is considered advisable to enter into detailed pre-application discussions with Council Officers to ensure that all matters are satisfactorily addressed in any future planning application on the site;
- 2) In particular it is consider that the matter of s106 contributions should be discussed, particularly with regard to the level of contributions, if any, that the Council will seek for the proposal, including affordable housing;
- 3) We would advise that a consultant is commissioned to provide a marketing / employment land supply report to accompany any application. It may also be necessary to provide further transport advice, although it is likely that the proposed residential use would have a lower trip generation than the existing office use.
- 4) We would advise that a full planning application for should be submitted as soon as possible following pre-application discussions with Council Officers. The submission should be supported by a Planning Statement setting out how the proposal complies with relevant national and local plan policies and should address the matters raised previously in this letter.

IMPERIAL CHAMBERS, 41-47 LONGSMITH STREET, GLOUCESTER, GL1 2HT

APPENDIX

GLOUCESTER LOCAL PLAN 6/i

SECOND STAGE DEPOSIT APRIL 2002



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Policy No: H.1 - Allocation for Mixed Use including Housing

Description: MU.2 Western Waterfront

Change: Correct boundary to Western Waterfront, addition of Blackfriars area, add delineation and names of character areas



Contents / Brief

Site Analysis /Appraisal

Site Photographs

Planning Guidance

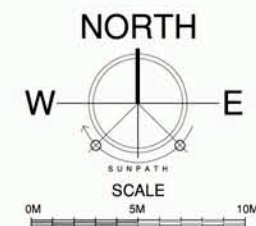
Redevelopment Options

Conclusion



Notes / Schedule Of Areas (Approx)

- **CONVERSION OF GROUND & UPPER FLOORS TO RESIDENTIAL**
- Residential Accomodation Provided (Approx):
15no. 1 Bed & 9no. 2 Bed,
Total 24no. Flats
- Additional 4no. 1 Bed Flats Could Be Gained If The Roof Space Is Converted - Subject To Additional Survey
- Flat Layouts Provided Without Details Of Existing Internal Layout Arrangements
- Built Block To NW Could Be Retained As Office To Provide Residential Units Within LA Affordable Housing "Trigger" Limits



Project

IMPERIAL CHAMBERS GLOUCESTER

Drawing Title

Sketch Proposals Option 1 Ground Floor

Date
June 2005

Scale
1:250 @ A3
1:500 @ A4

Drawn by
NC / GC

Project No
13814

Drawing No
SK003

Revision

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Contents / Brief

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IMPERIAL CHAMBERS, 41-47 LONGSMITH STREET, GLOUCESTER, GL1 2HT

CONCLUSION

Planning Context:

- The emerging local plan allocates a site totalling 100 hectares for a mixed use redevelopment which encompasses the appraisal site. Although the principle of a residential conversion may be considered acceptable (depending on employment land supply evidence) the timing of any redevelopment of this site will need to be carefully considered.

Development Potential

- In the absence of detailed internal arrangement information drawing SK003 illustrates in principle an indicative residential capacity study. 15 No 1-bed, and 9 No 2-bed units could possibly be provided although this would have to be confirmed once detailed internal information is made available.
- Redevelopment of the site for alternative uses such as hotel or a larger flat development could be explored if the demand is proven.

The existing site and built form would appear to lend itself to residential use (courtyard parking and corner lobby entrance area) although the issues of loss of the employment space and the local plan allocation would need to be addressed.

Clearly with each of the above options it will be important that your decisions are informed by both local agent market advice and the legal constraints of existing leases.

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