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Adam Gooch
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23rd March 2022

Dear Mr Gooch

Implications of Building Regulations 2010: Approved Document S -
Infrastructure for the charging of electric vehicles.

I am aware of the recent publication of the above document. Prior to finalising the consultation draft of the Main Modifications to the Gloucester City Plan 2011- 2031, I would be grateful if you could consider if its publication would have any implications on any of the draft policies?

I would be grateful for your prompt response. I will ask that the Programme Officer publishes this on the examination website.

Yours sincerely,

Louise Nurser

INSPECTOR

APPENDIX – OUTLINE OF MAIN MODIFICATIONS REQUIRED (IN PLAN ORDER)

To ensure the plan is sound, the following main modifications are required. Numbers in brackets refer to the PM numbers in CD010a, the Council's suggested schedule of changes to the plan. Some editing and amendments will be required to these prior to formal consultation.

For the avoidance of doubt, all references to paragraph numbers relate to the plan as submitted.

MM1: Relationship with the JCS

Make explicit that all the policies within the GCP are non- strategic (119). Requires consequential amendments throughout the plan eg para 1.5, and Appendix 6 of the GCP.

MM2: review of JCS

1.4 set out up to date position.

MM3: Resource efficiency and waste reduction

As per (004).

MM4: Vision/ Key Principles

As per (005).

MM5: Development needs and strategy

Insert paras 4.1 to 4.3, and 4.10- 4.16 after para 2.22.

Include reference to employment land and how it relates to the 192 ha identified within the JCS in SP1.

Amend the table at paragraph 4.10 as follows:

Strategic allocations (Tewkesbury Borough)	4331
Winnycroft Strategic allocation	620
Completed	5,070
Planning consents (commitments)	1769
Windfall allowance	512
Gloucester City Plan allocations	920
Other supply	92
TOTAL	13,314

Insert, 'at least' before 14,359 homes in first bullet point.

Set out how much employment land Gloucester City is required to provide over the JCS period.

Delete para. 4.13

Add new paragraph making explicit, notwithstanding the on-going review of the JCS, that the Council has a positive approach to bringing forward additional development consistent with the spatial strategy and policies of the JCS.

MM6: Housing

Delete last sentence of para 3.1.1

Add additional paragraph reiterating the positive approach to be taken by the Council in providing housing within the administrative boundary of Gloucester, in addition to the sites which are allocated to bring forward housing. (159)

Reference the housing requirement of at least 14,359 dwellings, as set out in Policy SP1 of the JCS and make explicit that the 7,772 urban capacity figure derived from the JCS is not a cap. (161)

Reference new appendices to update pages 109- 110 of the JCS to include an updated trajectory and five year housing land calculation. This should be based on Ex 11, other than the removal of the following allocated sites from the 5 year housing land supply: SA10 Former Fleece Hotel and Longsmith Street Car park (loss of 25 dwellings); SA16 Land off Lower Eastgate Street (loss of 15 dwellings) and SA18 Jordan's Brook House (loss of 10 dwellings). (76)

Table 2 should read as follows:

Small sites- 278 consisting of ((3 x 64) + 86))

Large sites- 1856

Large deliverable sites on the brownfield register- 92

City Plan allocations- 500

Strategic allocations in Tewkesbury Borough/ Gloucester City attributed to Gloucester 2,083

TOTAL 4809 units

Table 3 should read as follows:

Row k 4809

Row l 100%

Row m 5.00

Include table setting out 5 year housing supply for travelling showpeople.

Reference supportive approach to the provision of pitches and plots for gypsy and travellers and travelling showpeople. (160)

Include reference to the needs of gypsies and travellers, and travelling showpeople within paragraph 3.1.3.

MM7: Policy A1

Insert housing into title.

Rephrase first line to be positively worded: 'Development for housing will be permitted where it makes effective and efficient use of land of buildings and: ...'.

Delete the word 'amenities' in the second bullet point and replace with 'living conditions', or similar.

Add a criterion to ensure that the development results in good living conditions for those occupying the development. (120)

Delete reference to 'saturation of intensified properties' within the policy and the supporting text.

MM8: New policy

Insert standalone Houses in Multiple Occupancy policy.

MM9: Policy A2- Affordable housing

Delete the policy and supporting text. (121)

Consequential amendment to Policy A5- delete text beginning, 'Where development falls...', underneath criterion 4).

MM10: Policy A4- Student accommodation

Amend criterion 1) to broaden policy to include students who attend block courses (121) and insert 'to the educational establishment' within criterion 4). (122)

MM11: Policy A5- Specialist housing

Delete 'Development proposals must be', and replace with 'Specialist housing will be permitted where...'.

Delete 'supported by a sustainable business model'.(126) Make consequential amendments to paragraphs 1.38 and 1.39.

Delete criterion 4) and provide criteria to determine whether a concentration of a particular form of specialist housing would lead to harm. (124)

MM12: Policy A6- Accessible and adaptable homes

Delete '50% of housing..' and replace with, '25% of housing...'.

Delete text after, 'wheelchair user dwellings'.

Include additional supporting text setting out the circumstances where category M4 (3) (2b) will be required. (129)

Set out within the supporting text the circumstances under which a specific site would be less suitable for M4(2) and M4(3) compliant dwellings. (10)

MM13: Policy A7- Self build and custom build homes

Remove reference to ,‘a minimum of 5% of the net developable area... as serviced plots’, and replace with, ‘5% of the serviced plots shall be offered.....’. (130)

Second paragraph insert, ‘or a shorter period if previously agreed with the Council’, after ‘a minimum of 12 months...’. Delete ‘a 12- month period’ and replace with ‘set marketing period’. (131)

MM14: Employment development, culture and tourism

Introduction- Insert text explaining that the JCS Update Note provided an indicative availability of land for offices, research & development, light and general industrial, storage and distribution of 7 ha.

Amend paragraph 3.3.3 to delete the allocations which have already been permitted and are being developed, or which are to be deleted.

MM15: Policy B1- Employment and skills plans

Split policy to reflect the difference between the construction and the operational stage of the development.

Remove second paragraph from policy text and include within supporting text. Include reference to the Construction Industry Training Board. (12)

MM16: Policy B2- Safeguarding employment sites and buildings

Remove reference to ‘B Class’ from the policy and supporting text. Replace with, ‘offices, research & development, light industrial, general industrial, storage and distribution’.

Replace ‘non- B class use’ with ‘other uses’.

Delete ‘and’ after criterion a) replace with ‘or’ and insert new criterion b) ‘Alternative local employment facilities of an equivalent standard can be provided without adversely impacting on the operation of the existing business and its accessibility to existing employees; and..’.

MM17: Policy B3- New employment development and intensification and improvements to existing employment land.

Remove reference to 'B Class' from the policy and supporting text.
Replace with, 'offices, research & development, light industrial, general industrial, storage and distribution'.

Add additional text to criterion 3) and additional criterion 6). (14)

Delete, 'for example...'. (173)

Last paragraph, delete reference for 'non- B class uses' and replace with 'limited development outside these uses will be supported where...' Delete 'for B class uses'. (110a)

MM18: Policy B4- Development within and adjacent to Gloucester Docks and Canal.

Delete criterion 2. Replace with text as per (16a).

Criterion 3) delete 'environmental'.

Add additional text as per (17 & 18).

MM19: Policy B6- Protection of Public Houses

As per (174).

MM20: Policy C1- Active design and accessibility.

Remove reference to Active Design and Sport England. (132)

MM21: Policy C3- Public open space, playing fields and sports facilities

Amend as per (23.)

Remove reference to various strategies. (133)

MM22: Policy C4- Hot food takeaways

Criterion 2 as per (135). Delete reference to 'neighbouring' replace with 'nearby'.

Criterion 3 as per (25).

Criterion 5 as per (112).

Criterion 6 as per (136) make consequential amendment to supporting text.

Amend supporting text as per (26).

MM23: Policy C6- Cordon Sanitaire

Reference policy WCS11 of the Gloucestershire Waste Core Strategy 2012.

Include additional policy text to set out the circumstances under which planning permission would be granted for sensitive uses that could potentially constrain the operation of the Netheridge Sewage Works.

Delete second sentence in para 3.31 of supporting text.

Include supporting text which explains that circumstances may alter over the plan period, through the intensification of waste facilities at the site, or a reduction in odour nuisance, through the introduction of new technologies. Consequently, the cordon sanitaire should be treated as a trigger, to ensure that any development which could be adversely affected by odour is able to take place, without impacting on the operation of the Sewage works, or without resulting in unacceptable living conditions.

MM24: Policy C8- Changing Places Toilets

Amend policy as per (113) (138) and (139).

MM25: Policy D1- Historic Environment

Amend policy as per (36A).

MM26: Policy D2- Non-designated heritage assets

Amend policy as per (37A).

MM27: Policy D4- Shopfronts, shutters and signs

Move to Design section.

Amend policy as per (140-142). Ensure policy is written in a positive manner and is not overly prescriptive in terms of design or materials.

Amend supporting text to be more flexible.

MM28: Natural Environment- Introduction and context

As per (41), (42a).

MM29: Policy E1

Delete the policy.

MM30: Policy E2

Delete reference to the Gloucestershire Local Nature Partnership.

MM31: Policy E3

Delete reference to the Gloucestershire Local Nature Partnership.

MM32: Policy E4

Move E4 to end of chapter.
Amend as per (44, 45a, &146).
Delete last sentence in paragraph 4.5.8 of the supporting text.
Insert text referencing the requirement for developments to provide tree lined streets, as per the Council's response to the 2021 version of the Framework.
Remove last sentence of penultimate paragraph and reference within supporting text.

MM33: Policy E5

Reword policy to ensure that the objective of the policy is that green infrastructure is designed to meet established recognisable standards including those within the National Design Guide.

Make consequential amendments to the supporting text.
As per (46 & 114).

MM34: Policy E6

As per (147, 49a, 50, 51, 52, 53, & 54).

MM35: Policy E7

As per (55).

MM36: Policy F1- Materials and finishes

Amend as per (149 and 150).

MM37: Policy F2- Landscape and Planting

Amend as per (149 and 150).

Amend paragraphs 3.6.7 and 3.6.8 to be less prescriptive.

MM38: Policy F3- Community Safety

Amend as per (60 and 61).

Amend as per 152 and insert 'cycle routes' after footpaths.

MM39: Policy F5- Open Plan Estates

Amend as per (62).

MM40: Policy F6- Nationally Described Space Standards

Insert (or any future successor) into policy.

Reference exceptions where development would be acceptable where it does not meet the standards.

Require reference to transitional arrangements within supporting text.

MM41: Introduction to Chapter G: Sustainable living, transport and infrastructure

Insert as per (116) except, delete text after 'Waste Minimisation Statement' in new para 3.7.7 and delete text in new para 3.7.8, 'A proposals demonstrations....(and future iterations).

Amend fourth bullet point to delete reference with 'Building with Nature'.

Delete all of para 3.7.9 after, 'Energy Strategy 2019'. Insert reference to 'The Gloucestershire Climate Change Strategy 2019 and The Gloucester Climate Change Strategy and future iterations'.

MM42: Policy G1- Sustainable transport

Remove references to other documents that elevates them to development plan status (153) and include within supporting text if necessary.

Remove references that suggest that GCP is not the decision maker.

Rewrite policy to set out sustainable transport criteria against which future development proposals will be determined.

Include text as per (78).

MM43: Policy G2- Charging infrastructure for electric vehicles

Amend as per (69).

Amend as per (70) remove references to socket from policy.

Define what is meant by a rapid charger.

In second paragraph replace 'properties' with 'developments'. Delete text after 'strongly encouraged'.

Delete paragraph 3.7.15 of the supporting text.

MM44: Policy G3- Cycling

Amend as per (71 & 72 & 155).

Delete first part of second paragraph up to and including, 'other partners'.

Include additional policy text reflecting the requirement for all development to provide safe and secure access by cycle.

Ensure reference to Local Transport Plan is removed from policy text.

MM45: Policy G4- Walking

Remove reference to the County Council and other partners from the policy text.

Make explicit that pedestrians are the top of the road hierarchy for all developments.

MM46: Policy G6- Telecommunications infrastructure

Amend as per (117 and 157).

Remove reference to the County Council and other partners from the policy text.

Make explicit that pedestrians are the top of the road hierarchy for all developments.

MM47: Policy G8- Review mechanism

Amend as per (75).

MM48: Site allocations

Provide new policy within a table setting out the land use allocations of each individual site.

Cross reference with allocation statements providing further detail to inform the determination of any application. (162)

Clarify that the indicative capacity for residential development should not be treated as a ceiling. (161)

MM49: Site allocations- Housing

SA03 Former Prospect House, increase residential capacity to 60 dwellings. (83)

SA04 Former Wessex House, ditto to 40 dwellings. (164)

SA05 Land at Great Western sidings, ditto to 300 dwellings. (165)

SA18 Jordan's House, reduce residential capacity to 10 dwellings. (168)

MM50: Site allocations- Commitments

Delete SA08: King's Quarter.

Delete SA12 Land at Rea Lane, Hempsted.

MM51: Site allocations- Employment

Delete SA07: Lynton Fields, Land east of Waterwells Business Park.
Delete SA22: land adjacent to Secunda Way.

MM52: Site allocations- Mineral consultation areas

Include reference to MCA within accompanying site allocation statements as per (79, 80, 81, 84, 89, 95, 99, & 101).

MM53: Site allocations- Mineral consultation areas and land contamination

As per (90).

MM54: Site allocations- Mineral consultation areas and mitigation measures

As per (85, 96, & 100).

MM55: Site allocations- SA03

As per (82 & 163)

MM56: Site allocations- SA09

As per (88).

MM57: Site allocation- SA10

As per (91).

MM58: Site allocation- SA11

As per (166).

MM59: Site allocation- SA15

As per (94).

MM60: Site allocation- SA16

Delete requirement for green roofs (167).

MM61: Site allocation- SA21

As per (169).

PLAN WIDE

MM62: Relationship with other development plans

Reference and set out how each policy relates to the relevant policy in the JCS (172), or the Gloucestershire Waste Core Strategy 2012, or the Gloucestershire Minerals Local Plan 2018- 2032 (GMLP).

MM63: Other guidance

Remove reference to external studies, guidance or policy documents from the policy text.

MM64: National Planning Policy Framework 2021

Update any references to the previous version of the National Planning Policy Framework to the 2021 revision.

MM65: Monitoring framework

As per (177).

MM66: Superseded policies

Clarify that all policies from the 1983 Gloucester Local Plan have been superseded by the GCP with the exception of the retail policies, as the GCP does not have any retail policies, relying on the policies of the JCS.

POLICIES MAP

The following amendments are necessary to the submitted Policies Map for the geographic application of the policies in the GCP to be justified and effective.

As per (105, 178, 179 and 180, apart from SA22 which is to be deleted).