

GLOUCESTER CITY PLAN (2011-2031) STATEMENT OF COMMON GROUND

Between

Gloucester City Council and the Highways Authority (Gloucestershire County Council)

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Gloucester City Council, and Gloucestershire County Council as Highways Authority referred to hereafter as ‘the parties’. It documents matters which are agreed and disagreed by the parties with regard to text, policies, sites and evidence base for the Pre-Submission Gloucester City Plan.
- 1.2 This SoCG is provided without prejudice to other matters of detail that the parties may wish to address at the examination.

2. Background

- 2.1 The Highways Authority have been consulted at all stages of preparation of the Gloucester City Plan (GCP).
- The Scope (2011)
 - City Plan Part 1 (2012)
 - City Plan Part 2 (2013)
 - Draft Gloucester City Local Plan (2017)
 - Pre-submission Gloucester City Plan (2019)
- 2.2 The Highways Authority has been actively involved in the development of the transport evidence base, including all stages of the Gloucester City Plan Transport Assessment which underpins the policies of the GCP.
- 2.3 The Highways Authority has also been actively involved in the Joint Core Strategy (JCS) for Gloucester, Cheltenham and Tewkesbury, and the GCP will sit under this wider spatial strategy.
- 2.4 The JCS, adopted in December 2017, is currently under review. Gloucester City Council and the Highways Authority are working with the joint Planning Authorities as well as Highways England to guide the formulation of a transport strategy for the emerging JCS.
- 2.5 Since the GCP Pre-Submission consultation the council has undertaken a further piece of evidence looking at the Highway Authority’s concerns regarding Junctions 6 & 7 as identified in the original Gloucester City Plan Transport Assessment. This is referred to as Technical Note March 2020

3. Matters on which the parties agree

- 3.1 The City Council has engaged with the Highways Authority in the preparation of the Gloucester City Plan (GCP) through formal and informal consultation and as such the statutory duty to cooperate has been fulfilled.

- 3.2 That the Highway Authority are content with the models and scenarios utilised in the Gloucester City Plan (GCP) Transport Assessment (Oct 2019) and that subsequent additional Technical Note March 2020 satisfies previous concerns raised by the Highway Authority in response to the GCP Pre-Submission consultation.
- 3.3 The additional trips generated by the GCP at the two junctions represents less than 0.8% of the total flow, and well within accepted daily variation in traffic flows.
- 3.4 The delivery of the GCP sites which provide the majority of the impact on the junctions is phased, so the small increases in trips will be realised over 4 years.
- 3.5 The GCP assessments assume no modal shift away from car to sustainable modes, but in practice all sites in the GCP will have Travel Plans to reflect the sustainable locations in which they are located; therefore, the trip generation is expected to be robust.
- 3.6 That the GCP contains no parking standards and applications will be dealt with on a case by case basis.
- 3.7 A number of the points raised during the Regulation 19 consultation by the Highway Authority relate to Development Management issues and these will be actively pursued in a positive manner separately to the plan making process.
- 3.8 The parties agree to continue to work positively together.
- 3.9 Policy G2: Charging infrastructure for electric vehicle (EV) – During the Regulation 19 consultation the Highways Authority responded that the policy was ‘weak’ and ‘needed further consideration’. No suggestion of an amendment or evidence was put forward during the consultation periods.
- 3.10 The following email correspondence was received by the City Council on 23rd July 2020 from the Highways Authority:

“Policy F3 – Community Safety (Page 70).

Rear parking could only be considered in situations where parking in the street, to the front or side does not provide sufficient parking. If in exceptional circumstances rear parking courts are permitted, they should be well lit, overlooked, the same style as other parts of development, and restricted to a maximum of 10 spaces per court. Parking courts should only have one entrance/exit point to ensure that there is no reason for non-residents to travel through the court.

Policy G2 – Charging infrastructure for electric vehicles (Page 75).

There are four types of EV charging currently available – slow (<=3kW), standard (3.5-7kW) , fast (7-25kW) and rapid charging (43-62kW). An appropriate minimum provision for residential dwellings should be 7kW power capacity to provide standard charging at home and work (staff parking) locations. Non-residential uses should provide a 22kW charging point in visitor areas with a minimum of 1 space to be provided. Rapid charging infrastructure could be used at new development with parking spaces >50 and could be explored as a commercial opportunity where a third party could run and manage on site.

Active and Passive Provision.

Active provision includes all cabling that can be provided at the outset during construction or later on utilising the passive infrastructure provided during construction. Passive provision provides cabling during the construction to enable the future provision of active charging points. Subject to agreement with the local planning authority, standard provision may require installation of groundwork / passive wiring at the outset. Providing passive charging infrastructure is not only cost-effective but also enables further installation to match future demand.

EV Charging points.

Location and design of EV charging points need to be considered from planning stage to maximise the number of cars that can be served by the same charging point. Charging points should take into consideration allocated parking, unallocated parking, on-street parking and on-site parking (retail and employment). As per national guidance, charge points are required to be 'smart' as defined in the Automated and Electric Vehicles Act 2018 (Section 15, p9).

http://www.legislation.gov.uk/ukpga/2018/18/pdfs/ukpga_20180018_en.pdf

It is recommended that initially 5% of the total parking provided and a further 5% of the total parking spaces at an agreed trigger but no later than 3 years from the first opening are to provide EV charging systems.

Non-residential: Every non-residential building undergoing a major renovation with more than 10 car parking spaces is to have one charge points and cable routes for an electric vehicle charge point for one in five spaces.

Commercial development must be supported by a travel plan to promote sustainable travel choices irrespective of the number of car parking spaces provided and where a transport assessment is provided they should be a key factor in managing traffic generation and car parking supply.

Every new residential building with an associated car parking space is to have a charge point."

- 3.11 Whilst the City Council are broadly supportive of the recommendations the comments were received outside of the consultation stages and therefore not duly made. The City Council were therefore not in a position to amend the policies prior to submission. A number of proposed changes on which both parties agree, are suggested in Section 4 of this Statement of Common Ground.

4. Proposed changes

- 4.1 Should the Inspector be minded to consider, both parties agree on the following proposed minor changes to the Presubmission Gloucester City Plan:
- 4.1.1 Wording "County Highways" to be replaced with "*Highways Authority*".
 - 4.1.2 Policy C4: Hot Food Takeaways. Amend wording to ensure that safety is referred to as acceptable or unacceptable and capacity is referred to as severe in accordance with NPPF.
 - 4.1.3 Policy G1: Sustainable Transport. Amend "Gloucester City Plan Highways Assessment" to read "*Gloucester City Plan Transport Assessment*".

4.1.4 Paragraph 3.7.14 In terms of the technical requirements of this policy; for one dwelling the minimum requirement is a *charge point with a minimum power rating output of 7kW, be fitted with a universal socket that can charge all types of electric vehicles currently on the market and meet the relevant safety and accessibility requirements.* ~~single phase 13 amp socket. This is likely to be upgraded by the homeowner as technologies change.~~

4.1.5 Inclusion of a new paragraph of supporting text *“3.6.15 If in exceptional circumstances rear parking courts are permitted, they should be well lit, overlooked, the same style as other parts of development, and restricted to a maximum of 10 spaces per court. Parking courts should only have one entrance/exit point to ensure that there is no reason for non-residents to travel through the court.”*

4.2 The above have been included in Exam Document CD010a Schedule of changes Pre-Submission Gloucester City Plan addendum (November 2020)

4.3 Referencing errors within the Gloucester City Plan Transport Assessment have been amended in accordance with Highway Authority’s suggestions detailed below:

“section 7.1.2 stated that a DoS of 95% is assumed as the capacity threshold, however, the DoS for the A430(N) and the A430(S) are 92.1% and 92.3% respectively at the Junction 9/A430/Llanthony Road and the assessment concluded the junction operating above capacity threshold. The section reference in Table 7-1 should be 7.3.1, 7.3.2, etc. instead of 7.4.1, 7.4.2, etc. Section 7.4.1 assesses the junction performance of junction 2/the A430/Gouda Way/Worcester Street, however, Table 7-8 shows the results for the A4031/A430/Bristol Road.”

These minor amendments do not affect the meaning or outcome of the evidence base.

5. Matters of Uncommon Ground

5.1 The City Council agrees with the principle of increasing EV charging in non-residential developments from at least 2% to 10% within three years, and to ensure non-residential buildings with 10 or more parking spaces undergoing major redevelopment provide EV charging as proposed by the Highways Authority. However, the City Council do not consider it appropriate to amend the policy without further discussion in a public forum, given that the comments were not duly made, and no evidence was presented. It is therefore proposed that the matter is discussed with the Inspector through the Examination in Public.

5.2 It should be noted that Sport England also requested the percentage of EV in commercial developments to be increased.

6. Conclusion

6.1 The parties agree that:

- a) All matters raised in the Highway Authority’s representations to the Gloucester City Plan Regulation 19 consultation have been addressed by the City Council;
- b) Comments received after the Regulation 19 consultation closed are to be considered during the Examination in Public, should the Inspector be minded to do so;
- c) Gloucester City Council has complied with the Duty to Co-operate in preparing the Gloucester City Plan through the various stages to date;

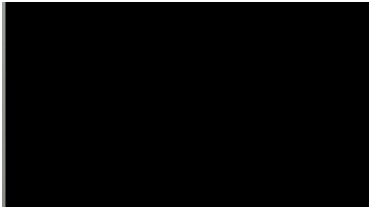
- d) The parties will continue to work positively together and with all Gloucestershire local authorities and, where relevant, with neighbouring authorities on strategic cross boundary issues.

Signed on behalf of Gloucester City Council



Ian Edwards, Head of Place

Signed on behalf of Gloucestershire County Council (Highways Authority)



Stephen Hawley, Highways Development Management Team Leader

Dated:

18th March 2021