

Matter 7: Promoting sustainable transport and supporting high quality communications

Whether the GCP is justified, effective and consistent with the JCS, and national policy in relation to its approach to promoting sustainable development?

- 58. Are the proposed levels of development justified by appropriate transport evidence? Notwithstanding that the broad development strategy has been set within the JCS, are the transport policies and allocations contained within the GCP consistent with paragraphs 102- 107 of the Framework?**
- 58.1 The proposed levels of development are justified by appropriate transport evidence presented in the JCS evidence base and Submission Document SUS004 'Gloucester City Plan Transport Assessment October 2020'. Highways England and Gloucestershire County Council as Highway Authority have both been fully engaged in the plan making process and Statements of Common Ground have been signed with both organisations (SoCG1 and SoCG2).
- 58.2 The identified planned growth for Gloucester was tested as part of the JCS strategy development work and forms part of the agreed package arising from Scenario DS7 which includes measures to mitigate impacts to the strategic road network.
- 58.3 The Statement of Common Ground with the Highway Authority confirms agreement that the Highway Authority are content with the models and scenarios utilised in the GCP Transport Assessment and that the subsequent additional technical note (Submission Document SUS005 Gloucester City Plan Transport Assessment Technical Note March 2020) satisfies previous concerns raised by the Highway Authority in response to the GCP Pre-Submission consultation.
- 58.4 The additional trips generated by the GCP at the two identified junctions represent less than 0.8% of the total flow and are considered well within accepted daily variation in traffic flows. 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.
- 58.5 The GCP does not set local parking standards and as such paragraphs 105 and 106 of the NPPF does not apply.
- 58.6 In line with paragraph 102 of the NPPF, the GCP has benefitted from the JCS evidence base which has helped to ensure that transport issues have been considered from the earliest stages of the plan making. Such matters were also considered through the Sustainability Appraisal process which is referred to in the Statement of Common Ground with Highways England.
- 58.7 The JCS promotes the use of sustainable modes of transport which has been strongly emphasised and built upon within the GCP. The GCP includes several policies that promote the use of active sustainable travel.
- 59. Do policies A1, G1, G3 and G4 provide the unambiguous approach to decision making, as set out in paragraph 16 d) of the Framework? Is it appropriate for a local plan policy to defer to other documents which have not been subject to independent examination, and**

to suggest that the Council is not the decision maker? Should parking standards be included within the GCP?

- 59.1 Collectively policies G1, G3, G4 of the GCP are intended to respond to the JCS and demonstrate the Council's commitment to sustainable transport.
- 59.2 As a two-tier authority the LPA does have to work closely with Gloucestershire County Council particularly when it comes to transport issues. The City Council remains the decision taker, however there is heavy reliance on the expertise of the County Council as local Highway Authority. The County Council are responsible for the Local Transport Plan, Manual for Gloucestershire Streets, and provide guidance for cycle routes and parking standards. These documents and guidance are considered to be of material consideration in the decision-making process.

Parking Standards

- 59.3 As a two-tier authority the City Council relies upon the expertise of colleagues in the County Council as Highway Authority to comment on the suitability of parking and highway safety in proposed development. The preferred working method is to have a flexible approach to parking requirements that are considered on a site by site basis. When assessing the suitability of the parking proposed in a planning application the County Council refer to 105 of the NPPF and look at accessibility, development type, mix, use, opportunities for public transport, and car ownership. This site by site approach is driven by a number of factors.
- 59.4 The city is relatively small in size with a limited number of development sites. The city centre in particular, given its sustainable location and proximity to the rail and bus interchange, can support no car or low car developments. The suburban edges of the city, which are less well served by public transport and have higher levels of car ownership require a different approach. It was not considered expedient to produce individual car parking requirements for each of the proposed allocations or a number of development types given the limited development opportunities. The current assessment approach works well.
- 59.5 Policy SD4 of the JCS and Paragraph 102 of the NPPF seek to ensure that patterns of movement, streets and parking are integral to the design of a scheme and contribute to making high quality places. The Council therefore considers that a flexible approach is necessary to ensure that design is not compromised by set parking standards. A previous version of the Local Plan (Second Stage Deposit City of Gloucester Local Plan 2002) has a maximum parking standards policy (TR.9) which has unfortunately led to the creation of a number of legacy parking issues. These are particular evident in the first phases of the Kingsway urban extension where there simply is not enough parking for a suburban area. This has negatively impacted the appearance of the area and led to ongoing issues for residents and waste collection. Later phases of the development (post PPG13 and Manual for Streets) have utilised a design led flexible approach to parking and have benefited from a higher standard of layout, design, and functionality.
- 60. Is the principle of Policy G2 consistent with the JCS and national policy, with reference to paragraphs 105 and 110 of the Framework? How would any potential changes to the building regulations impact on the implementation of this policy? Is the wording of the policy effective and suitably flexible to adapt to rapid change in the numbers of electric vehicles, and technological innovation?**

- 60.1 JCS Policy SD4 ‘Design Requirements’ states that new development should incorporate, where feasible, facilities for charging plug-in and other ultra-low emissions vehicles.
- 60.2 Policy G2 is not setting parking standards in terms of the quantum of provision of parking spaces that shall be provided with a development. It is specifying that where there are to be parking space how many of these shall be able to accommodate EV charging.
- 60.3 As identified in the Statement of Common Ground with the Highway Authority (SoCG2) the Council is open to enhancing the requirement for charging infrastructure, should the Inspector be minded to consider the proposed approach suggested by the Highway Authority through the examination process.
- 60.4 If new Building Regulations come into force that are of a higher or equivalent standard, then the policy would become obsolete and be removed during the plan review process. In the interim the Council believes that it is important to make this commitment to help the Council achieve its aims with regard to tackling climate change and improving air quality.
- 61. Is it appropriate that Policy G5 requires development to be connected to high speed full-fibre broadband connection? Is the policy effective and consistent with the JCS and paragraph 112 of the Framework?**
- 61.1 Yes, Policy G5 seeks to support the expansion of full fibre connections and prioritises connections to new developments in line with Paragraph 112 of the NPPF. Furthermore, the JCS Ambition 1, Strategic Objective 1 seeks increasing access to high speed broadband for both urban and rural areas to drive investment and employment opportunities and to enhance quality of life and access to services. Policy INF6 ‘Infrastructure Delivery’ of the JCS sets out that the LPA will seek to secure appropriate infrastructure including broadband infrastructure. The GCP Policy goes further to ensure connection and quality of provision for all new residential and commercial development. Previous developments in Gloucester have not benefited from high speed broadband connection which has subsequently been retrofitted post completion of the development. This is inefficient and requires new roads and footways to be partially demolished and reconstructed wasting time and resources. The recent lockdowns and homeworking in light of the Covid-19 pandemic have highlighted the importance of high-speed broadband connectivity for employment, economic activity, access to goods and services, education and communication.
- 62. Does the wording of policy G6 provide the positive support for the expansion of electronic communications network as expressed by the Framework? Is the supporting text to Policy G6, and specifically paragraph 3.7.24, consistent with the policy text, the policies of the JCS, and the Framework?**
- 62.1 Policy INF6 ‘Infrastructure Delivery’ is silent on the specific issue of telecommunications and so in responding to requirements of the NPPF and local priorities the Council considers it is necessary to provide a positively worded policy that enables telecommunications infrastructure to be sympathetically designed and camouflaged, where appropriate, in the context of the historic city of Gloucester.
- 62.2 The wording of Policy G6 is supportive of the expansion of the electronic communication network and in accordance with Paragraph 114 of the Framework the policy does not impose a ban on such infrastructure. The Policy reflects Paragraph 113 which requires sites to be kept to a minimum and that new sites to be sympathetically designed.

62.3 While the Council do not consider the Policy to be contrary to the Framework, on reflection it could benefit from a modification to make it more positive. For example, 'Development proposals for telecommunications infrastructure will be permitted where it can be demonstrated that...', rather than stating 'Development proposals...must...'. Similarly, paragraph 3.7.24 would benefit from being modified to make it more positive and better aligned with the NPPF.