

GLOUCESTER CITY PLAN EXAMINATION
MATTER 7 – PROMOTING SUSTAINABLE TRANSPORT & SUPPORTING
HIGH QUALITY COMMUNICATIONS

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission City Plan consultation dated 14th February 2020. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document.

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

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?

Under the 2019 NPPF, if the Council is setting car parking standards for residential development, policies should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles (para 105e) and development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations (para 110e). Policy SD4 of the adopted GCT JCS promotes, where feasible, facilities for charging plug-in and other ultra-low emission vehicles for the scale of development where a masterplan is required.

Under Policy G2, an electric vehicle charging point (EVCP) will be provided at every new residential property which has a garage or dedicated residential car parking space within its curtilage. In all other new residential properties, the provision of EVCPs will be strongly encouraged where, in the opinion of the City Council, it is reasonable to do so and where it is technically feasible.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government’s preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. It is the HBF’s opinion that Policy G2 is unnecessary because of the Government’s proposals to change Building

Regulations. The Council should acknowledge that its proposed policy approach will be superseded by proposed changes to the Building Regulations.

If changes to the Building Regulations are not implemented and Policy G2 is retained, the HBF consider that the physical installation of active EVCPs is unnecessary. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.

There is also an inconsistency in the Council's approach between the actual policy wording and the supporting text (para 3.7.15), which states that exemptions are made for residential flats / apartments and residential care homes with communal parking areas where, due to high costs and issues of security, servicing and maintenance it may not always be suitable or feasible to require charging points. This inconsistency is further exacerbated by proposed Main Modification PM069 set out in Schedule of Changes pre-submission Gloucester City Plan Addendum November 2020 (CD010a), which states that exceptions, for both residential and non-residential development, will only be made where the applicant can demonstrate the local electricity network is technically unable to support this.

The Council's Viability Assessments (VIA001 & VIA002) only include a cost of £976 for 50% of dwellings and no costs for local network upgrades (see detailed comments in HBF Matter 10 Hearing Statement). The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. Policy G2 should not compromise the viability of development. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers.

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?

Policy G5 requires all new residential development to be served by a high speed, reliable full-fibre broadband connection. The connection must reach

each dwelling. Exceptions may only be made where applicants are able to demonstrate through consultation with broadband infrastructure providers that this would not be possible, practical or economically viable.

Under 2019 NPPF, planning policies should support the expansion of electronic communications networks and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered (para 112).

The HBF recognise that new residential development should have infrastructure to facilitate access to high-speed broadband connections. However, it is the HBF's opinion that the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R "Physical Infrastructure for High-Speed Electronic Communications Networks" of the Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. Furthermore, the delivery of broadband service connections is reliant on a third-party contractor over which a developer is unlikely to have any control.

The Council should not impose onto developers connectivity requirements beyond the provision of infrastructure as set out in Building Regulations. Policy G5 should be deleted.