

## Gloucester City Plan Examination

### Matter 7 – Promoting Sustainable Transport and Supporting High Quality Communications

#### Participant Statement by Savills on behalf of L&Q Estates

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- 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?**

No comment.

- 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?**

No comment.

- 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?**

We made comments on draft Policy G2 to the Regulation 19 Plan, specifically noting that whilst we had no in-principle objection to the provision of electric charging infrastructure as a policy requirement – it must only be where it is technically feasible and viable.

PM069 goes some way to addressing our concerns – confirming that the requirement for x1 charging point per dwelling will not be required where the local electricity network is *“technically unable to support this”*.

We support this modification.

However, we note that it is not just technical feasibility, but intrinsically linked to this, the viability of the scheme as a result of the provision of charging points and potentially electrical capacity reinforcements to the grid. This was explicitly referenced in the Department of Transport’s 2019 consultation on potential building regulation requirements for electric charging infrastructure; which had suggested an associated cost cap per dwelling.

The cost of the charging infrastructure and the cost of any works to the local electricity infrastructure must be considered within the local plan viability evidence base. According to the viability evidence, only the cost of the charging point (at £976/dwelling – paragraph 5.53 VIA001) has been accounted.

In combination with the second part of the draft policy: *“in all other new residential properties..”* and its test of ‘where it is reasonable to do so’; we suggest that the policy as drafted may result in frequent site

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specific viability exercises being required to demonstrate why this infrastructure can and can not be delivered on an individual basis.

In considering any amendments to the policy, and in light of the wider viability issues impacting on the Plan, we suggest consideration is given to the provision of passive infrastructure – comprising the ducting and cabling to enable a future connection to be easily installed at a later date. This removes the requirement of needing to demonstrate the policy requirement is fully viable at this stage of the local plan process, and also reflects the ownership of electric vehicles in the short/medium term.

In the longer term, the JCS Review can consider the requirement for active electric charging alongside wider carbon reduction policies.

**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?**

No comment.

**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?**

No comment.

**Savills**

**15.04.2021**