

## Main Modifications to Gloucester City Plan

The Gloucester City Plan (GCP) is a plan for the area that will allocate sites for housing and employment as well as provide planning policies that will shape future development in the city. It provides a plan covering the period from 2011-2031.

Gloucester City Council has prepared a Schedule of Proposed Main Modifications to the GCP for consultation. This consultation seeks views on the proposed Main Modifications and any changes to the policy map only. It is not an opportunity to raise matters that either were, or could have been, part of the earlier representations or hearings on the submitted plan. Comments should focus on whether the proposed Main Modifications comply with legal requirements and are considered sound.

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We are seeking your views on the Main Modifications to the Pre-submission Gloucester City Plan, which is the version of the plan submitted for examination. We would encourage you to respond by using the online consultation facility at:

<https://www.gloucester.gov.uk/planning-development/planning-policy/main><https://www.gloucester.gov.uk/planning-development/planning-policy/main-modifications-consultation/modifications-consultation/>

However, you may also send completed forms to us via email and post:

- Email: [cityplan@gloucester.gov.uk](mailto:cityplan@gloucester.gov.uk)
- Post: Planning Policy, Gloucester City Council PO Box 3252, Gloucester, GL1 9FW

**The consultation opens on Monday 16<sup>th</sup> May 2022 and you will be able to submit comments up to 6pm on Monday 4<sup>th</sup> July 2022.**

The following response form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Main Modifications to the Gloucester City Plan Response Form

<b>PART A: Personal Details – only complete once</b>	
Title:	<b>Mrs</b>
Name:	<b>Louise Follett</b>
Company:	<b>Pegasus Group</b>
Email Address:	████████████████████
Address:	██████████ ████████████████████ ████████████████████ ██████████ ██████████
<b>If you are acting on behalf of a client, please supply the following details:</b>	
Client Name:	████████████████████
Client Organisation:	<b>Eutopia Homes</b>

### Keeping you updated

Would you like to be notified of future progress on the Gloucester City Plan? (* we will do this via email)	
<b>YES</b>	<b>NO</b>

**Part B – Please use a separate sheet for each representation**

Please note – comments should be restricted to the proposed Main Modifications only and should not relate to any other aspect, site or policy of the Gloucester City Plan.

Name or Organisation: **Pegasus Group on behalf of Eutopia Homes**

To which Main Modification to the Pre-Submission Plan, Policies Map or updated Sustainability Appraisal does this representation relate?

<b>Main Modification, Policies Map or SA/HRA?</b>	<b>MM</b>
<b>Main Modification or Policies Map Number</b>	<b>MM 19</b>
<b>SA/HRA paragraph number</b>	

Do you support or object to the proposed modification?

Support	
Object	*

Please provide comments below on the Main Modifications to the Gloucester City Plan. Please be as precise as possible. If you wish to support the Main Modifications, or comment on the modifications to the policies map or SA, please also use this box to set out your comments.

Pegasus object to the proposed modification that all housing sites, including allocated sites which comprise 20 or more houses should offer 5% of serviced plots for sale to self and custom builders subject to demand being identified on the Council's Self & Custom Build Register.

It is not appropriate for sites that are affected by technical constraints such as noise, vibration or air quality to be required to offer self-build plots as homes at the site will have been granted planning permission subject to technical construction requirements, moreover sites that have been granted full planning permission subject to particular design requirements are not suitable as self-build plots as self-builders may wish to execute their own alternative designs for a self-build home.

Schemes that propose terraced accommodation are also unsuitable for self-build as they do not provide individual self-build plots.

It is noted that the policy excludes sites and applications for flats/apartments.

It is also noted that the Housing Monitoring Report for 2021<sup>1</sup> Appendix 7 states that there are 81 people with a local connection to Gloucester on the Council's self-build register and that no self-build planning permissions were granted in the 2020/2021 monitoring year.

The PPG<sup>2</sup> states the following ways in which authorities can increase the number of planning permissions suitable for self-build and custom housebuilding;

- *supporting Neighbourhood Planning groups where they choose to include self-build and custom build housing policies in their plans;*
- *effective joint working across service delivery areas and with local delivery partners including Housing Associations, Arms Length Management Organisations and housing developers;*
- *using their own land (if available and suitable) for self-build and custom housebuilding and marketing it to those on the register;*
- *working with Homes England to unlock land and sites in wider public ownership to deliver self-build and custom build housing;*

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<sup>1</sup> <https://www.gloucester.gov.uk/media/6189/final-draft-housing-monitoring-report-2021.pdf>

<sup>2</sup> PPG Self Build and Custom housebuilding Paragraph: 025 Reference ID: 57-025-20210508  
Revision date: 08 02 2021 <https://www.gov.uk/guidance/self-build-and-custom-housebuilding>

- *when engaging with developers and landowners who own sites that are suitable for housing, and encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested.*
- *working with local partners, such as Housing Associations and third sector groups, to custom build affordable housing for veterans and other groups in acute housing need*

The PPG does not state that all allocated sites of more than 20 houses should provide self-build units but suggests that '*certain allocated sites*' may provide a '*a number of units*'.

The policy as written is therefore considered to be contrary to national planning policy guidance.

It is also noted that to date no mention of this emerging policy has been made in pre-application discussions held by our client with the local planning authority however there is reasonable concern that this will become an adopted policy of the City Council in due course.

(Continue on a separate sheet /expand box if necessary)

Please set out what change(s) you consider necessary to improve the Main Modifications to the Gloucester City Plan. It will be helpful if you are able to put forward suggested revised wording for any policy or text. Please be as precise as possible.

The local planning authority should be clear about which allocated sites should deliver self-build plots and include reference to the matter in Site Allocation Statements to provide certainty to those seeking to invest in the City, particularly those investors such as our clients who are seeking to regenerate a long standing brownfield site situated in a sustainable location close to a public transport interchange in accordance with national planning policy guidance and the spirit of the NPPF (2021).

(Continue on a separate sheet /expand box if necessary)

Signature:



Date:

04.07.22

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Title:	<b>Mrs</b>
Name:	<b>Louise Follett</b>
Company:	<b>Pegasus Group</b>
Email Address:	████████████████████
Address:	██████████ ████████████████████ ████████████████████ ██████████ ██████████
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Name or Organisation: **Pegasus Group on behalf of Eutopia Homes**

To which Main Modification to the Pre-Submission Plan, Policies Map or updated Sustainability Appraisal does this representation relate?

<b>Main Modification, Policies Map or SA/HRA?</b>	<b>MM</b>
<b>Main Modification or Policies Map Number</b>	<b>MM 51 &amp; para 4.7.17</b>
<b>SA/HRA paragraph number</b>	

Do you support or object to the proposed modification?

Support	<b>*</b>
Object	



Please provide comments below on the Main Modifications to the Gloucester City Plan. Please be as precise as possible. If you wish to support the Main Modifications, or comment on the modifications to the policies map or SA, please also use this box to set out your comments.

Pegasus support MM51 and the changes proposed to Policy G1 Sustainable Transport and Parking.

Particular support is noted for Car Parking that;

*“All new development will provide car parking to a level and design that is appropriate for the local context..”*

The policy goes onto state that matters such as the accessibility of the development, the type and mix; availability and opportunities for public transport and local car ownership levels should all be taken into consideration.

Paragraph 4.7.17 states that;

*“The quantum of car parking will depend on the specific circumstances of the site. This will ensure that effective and efficient use of land is made. Those development that are centrally located, close to public transport, and in areas with low car ownership, will not require as much land dedicated to car parking as more suburban sites with high levels of car ownership and limited access to public transport. “*

This approach is supported.

(Continue on a separate sheet /expand box if necessary)

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N/A

(Continue on a separate sheet /expand box if necessary)

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Date:

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Title:	<b>Mrs</b>
Name:	<b>Louise Follett</b>
Company:	<b>Pegasus Group</b>
Email Address:	[REDACTED]
Address:	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

**If you are acting on behalf of a client, please supply the following details:**

Client Name:	[REDACTED]
Client Organisation:	<b>Eutopia Homes</b>

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<b>Main Modification, Policies Map or SA/HRA?</b>	<b>MM</b>
<b>Main Modification or Policies Map Number</b>	<b>MM 59</b>
<b>SA/HRA paragraph number</b>	

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Support	<b>*</b>
Object	

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Pegasus support MM59 which states that the capacity of allocation SA05 is uplifted from 200 to **300** residential dwellings.

Our client Eutopia Homes submitted evidence to the local plan examination that the site could accommodate a level of development to deliver greater than the 200 new homes originally proposed at the site and are currently in the process of preparing a full planning application, comprising both apartments and dwellinghouses totalling 315 new homes, which has included local public consultation and engagement and will be submitted to the Council in the summer.

(Continue on a separate sheet /expand box if necessary)

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N/A

(Continue on a separate sheet /expand box if necessary)

Signature:

A rectangular box containing a solid black redaction covering the signature.

Date:

04.07.22