

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.

All comments received will be submitted to the Planning Inspector and considered as part of the examination.

Please note that copies of all comments will be made available for the public to view (including your name but will not include any personal contact details or signatures), and therefore cannot be treated as confidential. Data will be processed and held in accordance with the General Data Protection Regulations 2018 and Data Protection Act 2018.

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/mainmodifications-consultation/>

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

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

The consultation opens on Monday 16th May 2022 and you will be able to submit comments up to 6pm on Monday 4th 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

PART A: Personal Details – only complete once

Title: Ms

Name: Kay Lillington

Company: Gloucestershire Playing Fields Association

Email Address: [REDACTED]

Address: [REDACTED]

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

Client Name:

Client Organisation:

Keeping you updated

Would you like to be notified of future progress on the Gloucester City Plan?

(* we will do this via email)

YES ✓

NO

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:

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

Main Modification, Policies Map or SA/HRA?	MM
Main Modification or Policies Map Number	MM27
SA/HRA paragraph number	3.3.9-3.3.11

Do you support or object to the proposed modification?

Support	<input checked="" type="checkbox"/>
Object	<input type="checkbox"/>

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.

See below

(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.

Policy C1 – point 3 part (d) the proposed revised text doesn't have the correct tense/phrasing for the word 'opens', meaning the sentence in part 3(d) doesn't make sense.

Para currently states:

'3. The development will support healthy active lifestyles by facilitating participation in physical activity by:

(d) Providing multifunctional spaces opens opportunities for sport and physical activity'

The text in part (d) therefore needs revising accordingly. Suggested revision:

(d) Providing multifunctional spaces to create opportunities for sport and physical activity

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

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:

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

Main Modification, Policies Map or SA/HRA?	MM
Main Modification or Policies Map Number	MM40 (and possibly MM46?)
SA/HRA paragraph number	4.5.56

Do you support or object to the proposed modification?

Support	<input checked="" type="checkbox"/>
Object	<input type="checkbox"/>

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.

See below

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

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Proposed Para 4.5.56 mentions **BS5837:2012 Trees in Relation to Construction**, which is relevant to protecting existing trees and vegetation on development sites.

There is now also another standard **BS8545:2014 Trees from Nursery to Independence in the Landscape**, which relates to ensuring that newly planted trees are given every chance to grow into mature, healthy specimens.

I wondered if including this within the City Plan might be a way of helping to ensure that new tree planting survives the first few years of establishment, as it has been widely recognised that a significant proportion of newly planted trees fail to survive to maturity and die soon after being planted in an urban environment. The Trees in Towns II report commissioned by the Department of Communities and Local Government highlighted that as much as 25% of all tree planting undertaken in the public sector actually fails. Although there has not been any comparable survey undertaken in the private sector, anecdotal evidence indicates that the failure rates are similar.

With street tree planting now a policy requirement, ensuring that young trees survive to maturity is even more important.

The paras below summarise what this additional British Standard provides, and I feel that having this included within the policy text of the City Plan may be one way of helping to keep more young trees alive on new development sites. MM46 also could possibly be a place for BS8545 to be mentioned?

Potential new wording for Para 4.5.56: *New planting should include measures for appropriate long-term maintenance **and specimen tree planting should be undertaken in accordance with the recommendations set out in BS8545:2014 Trees from Nursery to Independence in the Landscape or subsequent revisions.** It is expected that ~~the~~ **tree** protection measures will adhere to those contained within BS 5837:2012 Trees in relation*

to design, demolition and construction – recommendations, or subsequent revisions. The Council's Arboriculturist will advise.

Background info:

BS 8545 is a new British Standard to assist people involved in planning, designing, resourcing, producing, planting and managing new trees in the landscape. It describes a process for planting young trees that will result in them achieving 'independence in the landscape'. This means that they are healthy and have every chance of survival.

This standard will assist practitioners in making balanced and informed tree planting decisions. Ideally, all newly planted trees need to be able to grow with vigour appropriate to the species and situation, in good health, and with minimal nuisance to achieve the desired planting objectives.

BS 8545 gives recommendations for transplanting young trees successfully from the nursery, through to achieving their eventual independence in the landscape, specifically covering the issues of planning, design, production, planting and management.

BS 8545 sets out good practice in strategic and policy formation and then follows the whole transplanting process through to independence in the landscape, under the following clause headings:

Policy and strategy

Site evaluation and constraints assessment

Species selection

Nursery production and procurement

Handling and storage

Planting

Post-planting management and maintenance.

BS 8545 applies to trees where a distinct crown has been prepared in the nursery. It does not apply to whips, transplants and seedlings, or to other woody material.

This standard explains how new trees can be successfully grown and planted so that they flourish in the landscape without excessive maintenance. The standard promotes the principle that successful new tree planting relies on the integration of careful design, nursery production and planting site management, into one continuous process. All parts of the process are important and need careful consideration if new trees are to successfully achieve independence in the landscape.

The large amounts of research and anecdotal evidence on good practice throughout the breadth of preparing, planting and maintaining new trees, make it impossible to comprehensively list all that information within this standard. Instead, the standard seeks to distil the best of that information into discrete recommendations that summarize the process. It is structured so that users can access an overview of all parts of the process quickly and easily through the flowcharts and the body text. This is

supplemented by more detailed discussion in the annexes, which is supported by technical referencing of relevant scientific research. The intention is for users to be able to easily identify the clauses that are relevant to their needs and, if necessary, then drill down into more detail in the annexes, and follow that up with accessible research references, if even more explanation is required.

It is difficult to pinpoint the reason why the failure rate of new planting is so high, but one contributory factor is the present disjointed approach to production and planting. This standard seeks to define all the parts of the process as a continuous and joined-up sequence, rather than isolated parts that have no tangible connections.

Signature:



Date:

16/05/2022