

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: Mr
Name: Robert Barnes
Company: Planning Prospects Ltd
Email Address: [REDACTED]
Address: [REDACTED]

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

Client Name: [REDACTED]
Client Organisation: Pall Mall Estates

Keeping you updated

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

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: Planning Prospects Ltd

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?	Policy Map Addendums
Main Modification or Policies Map Number	MM or MAP Map Addendums 4 (67 – 69 London Road)
SA/HRA paragraph number	

Do you support or object to the proposed modification?

Support	
Object	X

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.

Whilst the inclusion of an addendum revising the site boundary here is welcomed, it is still incorrectly drawn. Following previous representations to the emerging Plan the north eastern boundary of the allocation has been moved outwards towards the rear of 1 Heathville Road. However, this expansion falls short of the rear boundary of 1 Heathville Road leaving a narrow strip of land apparently unallocated between the western end of the rear garden of 1 Heathville Road and the allocation.

(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 map should be redrawn to confirm that the allocation extends to the rear boundary of the 1 Heathville Road plot.

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

Signature:



Date:

29/06/22

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: Planning Prospects

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?	Main Modification
Main Modification or Policies Map Number	MM or MAP MM59
SA/HRA paragraph number	

Do you support or object to the proposed modification?

Support	X
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.

The modification here (and elsewhere, e.g. MM60) in relation to allocation SA03 to allow “approximately 60” dwellings is supported, and is more consistent with the likely yield from this site, allowing better and more efficient use to be made of it.

(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.

N/A

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

Signature:



Date:

29/06/22

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: Planning Prospects Ltd

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?	Main Modifications
Main Modification or Policies Map Number	MM or MAP MM81
SA/HRA paragraph number	

Do you support or object to the proposed modification?

Support	X
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.

The deletion of reference to the use of green walls and roofs is supported. These are unlikely to be appropriate in this setting and in particular any circumstances where buildings are reused / refurbished.

(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.

N/A

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

Signature:



Date:

29/06/22

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: Planning Prospects Ltd

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?	Main Modification
Main Modification or Policies Map Number	MM or MAP MM33
SA/HRA paragraph number	

Do you support or object to the proposed modification?

Support	
Object	X

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.

The proposed modification advises that great weight will be applied to the conservation of designated heritage assets, and that any harm will require clear and convincing justification. This echoes national policy, but only partially, and because it is partial (and the rest of the policy similarly partial) it gives the impression that the assessment of harm and its justification is uniform in all circumstances. This is not the case.

Paragraph 202 of the NPPF provides that, “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” This is a fundamental part of the balancing exercise provided by the NPPF, and reference should be made to it, or the Plan policy will appear inconsistent with national policy.

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.

Amend the proposed modification to add, “Less than substantial harm should be weighed against the public benefits of the proposal.”

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

Signature:



Date:

29/06/22