

Sorry it's not on individual forms currently out of country and completing on IPaD.

#### DM1

Policy Para 1. "Unacceptable levels of air pollution" not defined. Therefore policy outcome not measurable or enforceable.

Para 2.7 "close to the limit values" undefined therefore policy outcome unmeasurable and not enforceable.

#### DM3

Policy inconsistent with supporting text para 2.26 and treatment of contamination in real world.

For brown field sites to come forward we can not "minimise..." or "remove risk..." as both of these are absolutes. Current text places unnecessary blocks on development.

Para 1 change word "minimise" to "manage". This would allow a site with low levels of gassing to be protected by a gas membrane rather than having the risk minimised (gassing material removed).

Para 2 change word "remove" to "manage and mitigate". This would allow a brown field site to come forward with a gas membrane in place rather than having the risk removed by having material removed from site.

#### DM4

Para 2 - change word "maximise" to "increase" because again Maximise is an absolute and the maximum provision may run counter to other policy requirements - it might be argued that no play ground should be provided so that we can maximise the number of trees or area of grass!

#### DM9

Para 1 - not supported by the supporting text, not consistent with walking, cycling or clean air policy. The city recognise the increase in needs and appear to recognise that these Facilities should be within walking distances of the homes yet the policy puts blocks in the way for delivery.

Para 1 should not have any reference to network of centres as the centres are not the correct location for these facilities these facilities should be popping up every 800 - 1000m all across the city to make walkable childcare a practical alternative to getting in the car and driving to a centre.

#### DM10

Para 1 - evidence presented not consistent with national guidance on adoption of space national standards.

evidence presented does not demonstrate viability of the policy.

At the very least BCC policy should be viability dependant with zones or value areas where the city accept that it will be impossible to deliver.

Para 2 - evidence presented not consistent with national guidance - policy as written places additional burdened on every single development of more than 15 units when the CIL evidence base clearly shows that massive parts of the city can never meet this commitment. BCC should not be passing the burden of proof to the development community.

DM14 silent on requirement to provide tens of thousands of new on street charging points for EV's during the plan period. The move to EV and the requirement for charging in areas not well served by on plot parking will need managing as it will have an effect on highway safety.

Para 1 conflicts with maximum parking standards in current draft Parking SPD.

Para 2 should include reference to providing safe on plot charging for EV's.

DM15 policy is good but policy not consistent with Draft Parking Policy regarding maximum parking spaces - these maximums are not supported by evidence as required by NPPG at para 105 & 106.

Para 2 remove text after work "clubs" to remove internal inconsistency within this policy.

As with DM14 policy really should address how the city will manage the provision of EV charging where linked to residential and on street parking.

Regards

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