

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

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<b>X</b>	No	
4.(2) Sound	Yes		No	<b>X</b>
4 (3) Complies with the Duty to co-operate	Yes	<b>X</b>	No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

These representations have been prepared by Black Box Planning on behalf of Taylor Wimpey (TW) in respect of the land interests at site G2: Land at Whaddon. TW have majority control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north (previously Hallam Land) and Newland Homes controlling a small proportion of the site fronting Grange Road. All parties have been working jointly in respect of the emerging strategic allocation at Whaddon to ensure a comprehensive approach is taken to the masterplanning and deliverability of the site and associated infrastructure.

As a matter of principle, TW support the identification of Land at Whaddon as safeguarded land to help address the future housing needs of Gloucester City as stipulated in guiding principle 3 of paragraph 3.4.5. However, the words 'if required' should be deleted from guiding principle 3 and the JCS authorities requested to confirm the requirement for Whaddon in relation to the housing needs of Gloucester City or otherwise, and the quantum of the approximate 3,000 dwelling site capacity for the City.

The safeguarded status of Whaddon and the stipulation 'if required' is also referred to at paragraph 3.4.23 so the concerns raised in respect of paragraph 3.4.5 are repeated.

The G2 policy wording also echoes the safeguarded status of the Whaddon site to meet the needs of Gloucester City *'should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review.'*

It is not clear what is meant by the approved JCS review and whether this is a Reg 18 Preferred Option ratified by the JCS authorities, or the adoption of the JCS review post examination. The latter scenario raises grave issues for housing delivery in Gloucester City as the JCS review remains a number of years away from possible adoption. TW interpret the approved JCS as the Reg 18 Preferred Option stage, so the allocation of Whaddon for Gloucester City or otherwise can be confirmed before the examination of the SLP.

Notwithstanding that, TW also submit that the requirement for Whaddon to be confirmed as consistent with the approved JCS review is academic and unnecessary as the evidence base firmly pointing to the necessity for Whaddon for the City's growth requirement is already readily available with the adopted JCS evidence base including constraint mapping of green belt and flood zone.

As instructed by the JCS Inspector, the JCS (adopted December 2017) required an immediate review (as confirmed by JCS Policy Rev 1) in order to address the unmet needs for Gloucester City and Tewkesbury Borough. Essentially, the adopted JCS did not identify sufficient sites for the objectively assessed needs of Gloucester City over the Plan period, and hence there remains a substantial amount of unmet housing needs (1,072 dwelling shortfall) for Gloucester under the Adopted JCS. The immediate review of the JCS did not transpire as the Inspector indicated necessary upon adoption, and it has only commenced to a preliminary stage in the almost 4-year period post adoption with an Issues and Options consultation undertaken in 2018.

As such, the need for Whaddon for Gloucester's housing requirement is already established under the Adopted JCS with the shortfall in excess of 1,000 dwellings, and it will only be amplified by the JCS review which seeks to plan for growth in the order of 6,000 dwellings for the City. As evident by the adopted JCS examination, Gloucester is heavily constrained by green belt to the north and east and flood zones to the west and north. As such, growth at south Gloucester and specifically Whaddon is sequentially preferable having regard to NPPF (2021) paragraphs 141 and 154.

As such, the allocation of Whaddon should be made firm in the SLP and not deferred to the JCS review. It is readily obvious that Whaddon is consistent with the JCS spatial strategy which seeks to meet needs where they arise and plans for sustainable patterns of development. For the SLP to be effective, it should not defer the allocation of Whaddon

beyond the adoption of the plan. There is sufficient evidence and cross boundary working to provide certainty that the allocation is required.

In addition, to the concerns raised above, the fallback position for the Whaddon site as set out in the Reg 18 Draft Plan should be reinstated, whereby should the JCS authorities not require Whaddon, the site shall be considered as an option for meeting the district's own needs. The sustainability credentials of the site underpin that the location is a sustainable option for growth, be it delivering housing for either Gloucester's or Stroud's needs.

With regard to the specific criteria listed in policy G2, TW submit the following comments;

- 1) Support the site being identified for at least 3,000 dwelling with 30% affordable housing;
- 2) Object to the requirement for serviced site for showpeople as there is not evidence to demonstrate how site selection process has been determined, including no testing of any reasonable alternative including land at Hardwicke or Moreton Valance for example.
- 3) Clarification is required on the school provision with an update to be provided from Gloucestershire County Council to reflect its update methodology of pupil yield calculations and capacity assessments.
- 4) No objection as masterplan has flexibility for uses within the community core area should a party come forward to acquire land for a surgery.
- 5) The policy should recognise overall space provision on the masterplan as overprovision of certain types of green space may be preferable for environment/habitat creation resulting in modest under-provision of other types of green space. The policy should allow a degree of flexibility.
- 6) On mitigation welcome as masterplan for Whaddon incorporates on site mitigation with abundant, accessible, and attractive recreational spaces.
- 7) No object to local centre as masterplan seeks to deliver a local centre on the Stroud Road frontage.
- 8) No objection to buffers where appropriate and justified.
- 9) No objection
- 10) No objection
- 11) No objection but clarification required in respect of 'sensitive landscape' as the site is enclosed by the M5 and does not adjoin the AONB. The sensitivity of Whaddon Church is recognised in the masterplan.
- 12) No objection, walking and cycling intrinsic to the masterplan.
- 13) No objection, connectivity intrinsic to the masterplan.
- 14) 15) 16) 17) 18) 19) 20) - No objection
- 21) IDP need to reflect updated requirements for county education/other infrastructure following technical analysis and testing
- 22) No objection on understanding that employment uses are ancillary to local centre/community core. The masterplan does not envisage large business park for example owing to the site context and local employment provision.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

References to 'if required' and 'provided it is consistent with the approved strategy of the JCS review' should be deleted from part 3d of the plan, including at paragraphs 3.2.23 and 3.4.5 and within the G2 policy wording.

Furthermore, the policy should state allocated rather than safeguarded for the reasons set out in our submissions concerning policy CP2. In addition, the G2 policy wording should reflect how Whaddon will be considered for helping to meet Stroud District's housing need should the site is not required for Gloucester City. The site is inherently sustainable for delivering Stroud's growth, especially when looking at the travel to work data towards Gloucester City. The following revised working to policy G2 is proposed;

**Land at Whaddon, as identified on the policies map, is allocated for housing, with first priority to delivering the housing needs of Gloucester City and any residual site capacity contributing to the needs of Stroud District.**

#### **Travelling showpeople requirement**

Policy G2 seeks the provision of a services site for 8 plots for travelling showpeople to meet the unmet needs arising out of Gloucester City. The SLP evidence base provides no clear evidence of testing alternative sites for this provision including a methodology for site selection process. The policy is therefore not justified in respect of the requirement for this provision. Rather, it appears the requirement has been simply lumped into a strategic allocation policy. Without such evidence, there is no clear basis for selecting Whaddon as the most suitable and appropriate location for such provision. It is considered that alternatives should be tested having regard to the approach routes to the Whaddon site from the strategic road network.

#### **School Provision**

The policy provision for a 3FE primary school and a 2FE primary school, both incorporating early years provision, and contributions towards a 3.5 FE secondary school (+6 form) needs to be ratified by the education authority having regard to its change in practice as a result of the Coombe Hill appeal decision (Ref: APP/G1630/W/20/3257625). The Whaddon site controlled by TW has been subject to a successful bid for free-school funding with the intention that TW would make a land contribution within the overall S.106 package of obligations.

#### **G2 Map**

The map presented on page 160 of the Plan is inaccurate and exaggerates the extend of nondevelopable land around the Daniels Brook Corridor.

The plan should also indicated three points of access along the Stroud Road. A northerly access point which will serve the new model interchange is omitted, contrary to our previous submissions and the emerging masterplan for the site.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

TW control a majority proportion of the strategic site 'G2' land at Whaddon. On behalf of TW, Black Box Planning request attendance at the hearing sessions to assist the Inspector with any queries or discussions regarding the site at Whaddon and the proposed masterplan.

In addition, specific to Policy G2, we request the opportunity to make oral submissions regarding revisions to the policy as referred to above, and partake in general discussions regarding the requirements for the Whaddon site. It will also be helpful to provide the Inspector with relevant updates on the site including the free school funding and arrangement between the parties to assist early delivery of this critical infrastructure.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date: