

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	X	No	
4.(2) Sound	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes	X	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.

Taylor Wimpey (TW) support the identification of Land at Whaddon under Policy CP2 including the ability of the site to accommodate in the order of 3,000 dwellings. TW have been undertaking a comprehensive suite of technical assessments of the land under its

control to inform an emerging masterplan. This illustrates a site capacity of circa 2,700 dwellings on the TW controlled land. As such, an allocation of at least 3,000 dwellings is feasible and deliverable.

A plan indicating the extent of TW control and the proposed emerging masterplan for the TW part of the site accompany this submission as Appendix 1.

TW have concerns regarding the justification and effectiveness of the Plan in respect of the site's identification for the housing needs of Gloucester City only. Policy CP2 confirms that the land at Whaddon will come forward *'subject to it being required to meet needs and provided locating growth at this location is consistent with the approved strategy for the Joint Core Strategy Review'*.

Reference to the SA confirms, by virtue of the site's location immediately adjacent to the Gloucester City urban area and its associated infrastructure and amenities, that Land at Whaddon provides a highly sustainable and logical strategic growth location in Stroud District. However, the site's delivery through the plan-led system is predicated by the Policy CP2 requirement for it to be required/consistent with the approved Joint Core Strategy (JCS). We interpret the 'approved' JCS as the Reg 18 Preferred Option to be published late summer/Autumn 2021, therefore in advance of the SLP examination, and not the adoption of the JCS review. Clarification on this point is requested as the two plans will not align in moving towards adoption and the SLP requires clarity on the unmet needs of Gloucester before adoption.

In the unlikely scenario that the JCS should not require Whaddon to be allocated for Gloucester City's housing requirement, then the site should be re-allocated towards meeting Stroud's housing needs to ensure development is delivered in the most sustainable manner. Such an approach would ensure the Plan is justified and would be consistent with the Draft Plan for Consultation (November 2019) where at paragraph 2.13 it stated:

'Current indications are that Whaddon may be amongst the better performing options. If the process ultimately concludes that a site at Whaddon is not required to meet Gloucester's immediate needs, then there is potential to review how the land might contribute to Stroud's own needs and whether there is any merit in bringing it into the Stroud District Local Plan, with consequential changes to the strategy.'

Alternatively, if the Plan is to be effective with regards to cross-boundary working, the position of the JCS authorities should be confirmed at this Reg 19 stage of the Plan preparation and the site clearly allocated for Gloucester City's needs or otherwise.

NPPF (2021) paragraph 35 is clear that the effective test should ensure that matters are not deferred. TW object to Policy CP2 effectively deferring the allocation of land at Whaddon to the approved strategy for the JCS. It is already sufficiently evident that Gloucester City is constrained by virtue of floodplain to the west and north, and greenbelt to the north and east. As such, growth to the south of Gloucester at Whaddon is logical, sequentially preferable in accordance with NPPF paragraph 141 and justified having regard to the sustainability appraisal. Indeed, the Inspector of the adopted JCS gave a firm indication in her Interim Report (May 2016) that Whaddon should come forward in the JCS review where she stated:

*'The Stroud Local Plan has already started to be reviewed and the JCS authorities should engage with Stroud District Council with a view to discussing the potential for Stroud to contribute to Gloucester's requirements **by allocating land at Brookthorpe/Whaddon and Hardwicke**'*

There is sufficient evidence therefore for the allocation of Whaddon to be confirmed in the SLP rather than deferred with a safeguarded status.

TW also question whether the strategic allocations Sharpness and Wisloe Green as identified in CP2 are justified having regard the evidence base and other policy objective in the local plan. The viability evidence for Sharpness is particularly intriguing with numerous assumptions which are questionable including house prices and build cost.

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.

Land at Whaddon (G2) should be 'allocated' for 3,000 dwellings in Policy CP2 rather than safeguarded.

The paragraph within Policy CP2 addressing Whaddon should be modified as follows;

'Stroud District Council will make a contribution to meeting the unmet housing needs of Gloucester City by allocating land for housing growth at the following location, subject to confirmation from the JCS authorities regarding the level of contribution required. Any residual capacity on the site shall be apportioned to meeting the needs of Stroud District including the full allocation in the event that the site is not required by the JCS. it being required to meet needs and provided locating growth at this location is consistent with the approved strategy for the Joint Core Strategy Review.'

Location	Housing
Land at Whaddon	3,000

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 Land at Whaddon.

In addition, specific to Policy CP2, we request the opportunity to make oral submissions regarding revisions to the policy as referred to above, and partake in general discussions regarding the policy and how the sites identified contribute towards the Plans' overall objectives to plan for sustainable patterns of development.

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: