

## 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 of TW 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.

TW support Stroud Local Plan's (SLP) ambitious objective to be Carbon Neutral by 2030 as set out in Policy DCP1.

As expressed in the policy, the objective is clearly assisted by reducing the need to travel and making necessary journeys shorter by locating development in close proximity to essential

services and facilities. In that context, it is questioned whether the development strategy best reflects opportunities to plan sustainably with the carbon reduction objective in mind.

Land at Whaddon (site G2) is evidentially a highly sustainable location for development by virtue of its location immediately adjacent to Gloucester City and its associated infrastructure and services. The emerging masterplan for the site demonstrates genuine choice in terms of transportation with multi-modal interchange, capitalising on the site's location immediately adjacent to Gloucester City. The Whaddon site is therefore consistent with the objectives of DCP1.

Whaddon is 'safeguarded' in the SLP for the housing needs of Gloucester City. TW submit that in the event (however unlikely) that the Whaddon site is not found to be required for the needs of Gloucester City or only partly required; the SLP should make provision for the development strategy to allocate land at Whaddon for Stroud District's housing needs. Such an approach would support the objective of DCP1 for carbon neutrality by ensuring that the development strategy plans for homes to be delivered in the most sustainable locations. By comparison, it is not clear how the allocations at Sharpness and Wisloe Green are consistent with this policy objective. Both allocations have limited accessibility to infrastructure provision and are remote from key amenities making travel by car necessary.

For the reasons above, the Plan is not considered justified or effective in respect of Policy DCP1 in terms of how the policy objective correlates with other policies in the Plan, including the development strategy. In this regard, our submissions on other relevant policies in the SLP should be read in conjunction with this submission concerning DCP1.

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 development, with the apportionment of housing numbers to be agreed with the JCS authorities in respect of the contribution towards Gloucester City's unmet needs.

With the allocation of Whaddon within the SLP, the development strategy should be reconsidered to test the requirement for all other allocations and more specifically those that are less sustainable in accessibility terms. The justification for such a modification is underpinned by evidence including The Assessment of Strategic Development Opportunities (prepared by LUC).

**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:

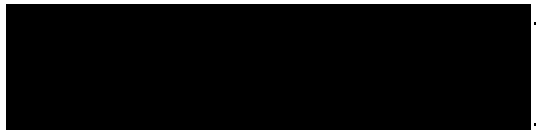
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TW control a majority proportion of the strategic site 'G2' Land at Whaddon. On behalf of TW, Black Box Planning request attendance at the hearing sessions to assist the Inspector with any queries or discussions regarding the site at Whaddon.

In addition, specific to Policy DCP1, we request the opportunity to make oral submissions and partake in discussions regarding the policy objective and how the plan as a whole addressing this core policy objective. This matter raises concern in respect of the plan being justified and effective having regard to the test of soundness.

***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:

