

Black Box Planning on behalf of Taylor Wimpey

Hearing Statement

Matter 1: Compliance with Statutory Procedures and Legal Matters

1. This Hearing Statement has been prepared on behalf of Taylor Wimpey and should be read alongside the Representations submitted in response to the pre-submission (Reg19) version of the Stroud Local Plan (SLP) in May 2021. It seeks to respond to specific questions set out in the Inspector's Matters, Issues and Questions raised in respect of Matter 1, where relevant to concerns held by Taylor Wimpey.
2. These representations are submitted with regard to TW's control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north 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.

Issue 1.1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004?

1. Has the Council submitted robust evidence to demonstrate that the duty to cooperate has been met? In particular:

a. Have all relevant strategic matters been identified and has the process for identification been robust? What actions have been taken to address these matters and are there any outstanding concerns?

3. Publication of an up-to-date Statement of Co-operation with the JCS authorities is awaited and is considered an important component to answer this question. Taylor Wimpey respectfully reserves the right to comment further should publication of such a statement be forthcoming or otherwise.

b. Has the Council carried out effective engagement with neighbouring local authorities and other prescribed bodies on all relevant strategic matters and have all outcomes been adequately evidenced? Is there robust evidence to support the cooperation activities that have taken place?

4. It noted that evidence in respect of the requirement for Travelling Showpeople Pitches has been recently added to the SLP evidence base (SLP-03). The assessment provides

the overall quantum of provision required for Gloucestershire. It is also noted that SLP-02 confirms that the Gloucestershire authorities will jointly commission work on a call of sites to help identify appropriate sites to ensure delivery of provision. Our earlier representations highlighted the lack of evidence underpinning requirements set out in Policy G2. Our concerns remain in this regard with no assessment of alternatives evident. We highlight the concern here with regard to the question of matters being 'adequately' evidenced, but this is perhaps also something to be addressed in Matter 6 as a site-specific point.

Have any unmet needs been appropriately considered when preparing the Plan?

5. The answer to 1a above is relevant in answering this question as an up-to-date statement with the JCS authorities will help inform the EIP in this regard. This issue of concern is regarding the 'safeguarding' of site G2 when all relevant evidence points to the need for its allocation to be confirmed.
6. It is clear from the JCS authorities Reg 19 response (916) that it supported the identification of Whaddon for the unmet needs of Gloucester City. Furthermore, EB8 (Topic Paper – Housing Needs and Supply October 2021) confirms the SLP's approach to addressing unmet need, and at paragraph 1.15 states '**...the Plan addresses unmet needs from neighbouring Gloucester by allocating a site for 3,000 dwellings at Whaddon for delivery by 2040.....**'.
7. Paragraph 5.17 of EB3 (Duty to Co-operate Statement October 2021) confirms that the City Council expects that its unmet housing needs for the new plan period could be between 5,631 and 6,131. At this juncture therefore, on the basis of the SLP's position that the G2 site is identified for Gloucester City's needs, the allocation of the site should be confirmed now to ensure unmet needs are deliverable in the plan period to 2040. There is no compelling evidence to delay the allocation in order for the JCS review to progress when the JCS authority area is heavily constrained around the principal urban areas of Gloucester and Cheltenham by green belt, AONB and Flood Zone 3. Without the allocation being confirmed it cannot be said that the SLP have appropriately considered unmet housing needs.

Sustainability Appraisal

7. Overall, does the SA adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

8. Taylor Wimpey question the accuracy of the SA scoring in respect of Whaddon and respectfully request it is revisited. Further details are set out in our Matter 2 Statement.