

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	<input checked="checked" type="checkbox" value="X"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="checked" type="checkbox" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="checked" type="checkbox" value="X"/>	No	<input type="checkbox"/>

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.

Core Policy CP10: Gypsy, Traveller and Travelling Showpeople site

As a matter of principle, TW support the identification of land for Gypsy, Traveller and Travelling Show People and recognise the need for such provision in plan making. However, for the reasons set out below, including regard to policy CP10, objections are duly submitted to the requirement for such provision within the G2 site (land at Whaddon).

Policy G2 concerning land at Whaddon includes a requirement for a serviced site comprising 8 plots for travelling showpeople. In considering the appropriateness of this requirement, policy CP10 provides for a sequential approach for such provision including, first preference to create additional pitches/plots within existing sites, second preference to extend existing sites and thirdly, only where the first and second preference cannot be achieved, the identification of new sites.

It is therefore clear and necessary that the local plan presents suitable and robust evidence to demonstrate that no alternatives opportunities for the serviced plots within the first and second preference of CP10 exist within the Gloucester urban area and Gloucester fringe area. There is no credible evidence submitted by Stroud District Council or Gloucester City Council in this regard.

The Gloucester City Local Plan is currently at Examination. Examination document HOU005 provides a position note on Gypsy, Traveller and Travelling Showpeople. It is apparent that the need identified for travelling showpeople is 8 plots and the full provision has been casually cast into the Whaddon strategic site. The suitability of Whaddon or reasonable alternatives has not been tested and the requirement with policy G2 is therefore not justified.

Evidence of testing of alternative sites in accordance with the sequential preference of Policy CP10 is not evident. HOU005 provides very limited information on alternative sites assessment with no detailed evidence presented for discounting sites. For example, land at St Oswalds Retail Park (in City Council ownership) is simply being pursued for higher value development opportunities. Specifically, the City Council propose to allocate the site for residential development (approximately 300 dwellings under policy SA11 of the Pre-submission Gloucester City Plan) with no attempt to integrate provision for travelling show people as part of the scheme, presumably in recognition that the uses are not considered compatible in either commercial or practical planning terms. That being the case, the imposition of the requirement within the G2 policy demonstrates inconsistent practice on the part of the City Council's when dealing with its own land holdings and privately controlled land.

By way of further example, land adjacent to Hempsted Recycling Centre is only discounted for its location adjacent to landfill without any technical evidence base. Land off Naas Lane on the west side of the railway line is also only discounted by virtue of its current use as temporary car storage. Essentially, the City Council is passing the requirement to its neighbouring authorities rather than proactively unlocking opportunities within the City.

TW object to the requirement for 8 serviced pitches in policy on the Whaddon site for compatibility concerns and due to the distinct lack of evidence to justify the requirement including the testing of reasonable alternatives. Policy CP10 implies that the provision is not normally compatible with neighbouring residential uses as well as stipulating other criteria. It states;

'If the need cannot be met at any existing suitable site the following location criteria will apply;

- a) *The proposal will not have an adverse impact on neighbouring residential amenity or other land uses*
- b) *The site has safe and satisfactory vehicular access and pedestrian access to the surrounding principle highway network*
- c) *The site is situated in a suitable location in terms of local amenities and services including schools, shops, health services, libraries and other community facilities*
- d) *The site is capable of providing adequate on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage*
- e) *The site will enable vehicle movement, parking and servicing to take place, having regard to the number of pitches, plots and their requirements as well as enabling access for emergency vehicles*
- f) *The site is not situated within an unacceptable flood risk area'*

Having regard to the criteria above, land at Whaddon is identified for predominantly residential development (at least 3,000 dwellings) with associated infrastructure and generous provision of public green space within the masterplan. The provision of pitches for travelling showpeople will impact on the neighbouring residential amenity or the amenity of the planned new schools. It is considered therefore, that the requirement for 8 services pitches is not compatible with a residential masterplan for the site.

Furthermore, Whaddon is predominantly a residential allocation without a strategic employment requirement in recognition that, although it is immediately adjacent to urban Gloucester, its location and context is not optimum for commercial vehicle movements accessing the motorway network. In this regard, there are sequentially preferable locations for uses that may involve commercial vehicle traffic.

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.

The allocation policy G2 should be modified to delete the requirement for 8 serviced plots for travelling showpeople. The site is not suitable, and its identification is contrary to the sequential approach set out by CP10. There is no robust evidence to demonstrate that there are no better located or better suited sites for the required provision.

TW is preparing a planning application for the Whaddon site following a comprehensive approach to masterplanning underpinned by technical evidence. The masterplan approach has also emerged following dialogue with L&Q Estates and Newland Homes who control other land within the proposed G2 site. The masterplan does not include provision for travelling showpeople plots for the reasons outlined above. The Whaddon site is being promoted by residential developers and the scheme requires very substantial contributions towards infrastructure provision including major highway improvements and provision of a new

secondary school and primary school. The masterplan viability does not identify excess land for travelling showpeople serviced plots.

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 CP10, we request the opportunity to make oral submissions regarding the policy approach and how this has been applied to the G2 site policy. It will be helpful to provide the Inspector with an update on the Whaddon site masterplan and planning application progress during the examination.

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:

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Date:

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