

4th July 2022

Ref: 18021



Planning Policy
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Dear Planning Policy,

Gloucester City Plan Main Modifications Consultation

On behalf of our clients Taylor Wimpey, please accept this letter as representations to the Gloucester City Plan Main Modifications consultation. Taylor Wimpey is promoting land at Whaddon (Stroud District Local Plan Site Ref: G2) on the edge of Gloucester City via the Stroud District local plan review to help meet the housing needs of Gloucester City. The site is currently identified as safeguarded land for the housing needs of Gloucester City within the submission draft Stroud Local Plan (May 2021).

It is noted that the City Council provided the Inspector with a note on 16th May 2021 to highlight the wording for the insertion to the Stroud Local Plan regarding Travelling Showpeople provision within the G2 safeguarded allocation. This wording was introduced to the Regulation 19 draft and has been the subject of objection from the promoters of land at Whaddon, including my client.

Our objections highlight that there is no credible supporting evidence base of testing alternative sites for this provision elsewhere in the City or cross boundary in neighbouring authorities, including a methodology for site selection process. For example, the Council merely dismisses the potential of land owned by City Council to meet such provision on the basis that the Council intends to pursue other development opportunities for the land.

Without a credible evidenced base approach, it appears the requirement for travelling showpeople has been in large part, hastily flung into a cross boundary strategic safeguarded allocation. 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 rigorously tested to identify suitable and deliverable locations.

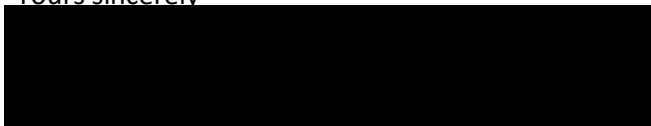
On this basis, the Main Modifications are unsound. The City Plan's response for the provision for Travelling Showpeople provision is very obviously unjustified. Furthermore, the City Council reliance on land within Stroud District for making half of the total required provision

is not effective, as clearly there are unresolved objections from the promoters of Whaddon. As such, the City Plan fails to make adequate provision and there is a distinct lack of evidence demonstrating a thorough assessment of available land. There can be no reliance on the G2 safeguarded land allocation at this juncture.

Furthermore, main modifications simply defer the matter to the JCS review. It is not appropriate for the City Plan to effectively wash its hands of the issue by deflecting the matter in part to the Stroud examination, and in tandem with the JCS review for which the timetable has been subject to severe delays. The City Plan should deal with the requirement now with Main Modification allocations based on a credible site selection process. The main modifications have a grave omission in this regard as they simply fail to deal with this matter adequately.

Please do not hesitate to contact me should you require any additional information.

Yours sincerely

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Conor Flanagan MRTPI

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