

## 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 type="text" value="Y"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="N"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="Y"/>	No	<input type="text"/>

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.

Policy CP2 sets out the spatial strategy for the plan. Pursuant to this, Policy CP4 sets out the approach and a "Mini Vision" for the Gloucester Rural Fringe.

There has, for many years, been a difficult tension across the Gloucester-Stroud boundary. Two successive Local Plan reviews in 2005 and 2015 have made strategic allocations – the largest made in either plan – directly adjacent to the City, at Coopers Edge (former Gloucester Trading Estate) south of Brockworth, and at Hunts Grove in Hardwicke Parish. It is evident that there remains no significant land within the city's boundaries appropriate for large-scale development.

Delivering housing within Stroud District directly adjoining the City certainly is a highly sustainable strategy in principle. Indeed both the previously-allocated sites at Coopers Edge and Hunts Grove developments also benefit from being directly adjoining both services and facilities, and some of the largest employment areas in the whole County, easily accessible by walking and cycling. The potential allocation at Whaddon also shares these characteristics to a considerable extent.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy preparation and examination exposed the degree to which the City has grown up to its boundaries. The unusually direct recommendations of the JCS Inspector regarding both Hardwicke Green (Draft allocation G1) and

Whaddon (Draft Allocation G2) flowed out from the evidence presented at that Examination. This included evidence presented by Stagecoach at the time, that highlighted the potential for both sites to integrate with the existing bus network more or less well. This evidence was specifically referred to in the Inspector's Preliminary Finding and Final Reports.

We note that the Council is taking the view that, despite the recently rehearsed evidence, Gloucester City will in some way in the immediate future, be presented with alternative potential directions that demonstrably would more sustainably accommodate the City's unmet needs, as part of the Review of the JCS that has just started. Accordingly, until the site are re-evaluated against other options in Tewkesbury Borough and Forest of Dean Districts, the Council will make no commitment to allocate this, or indeed any site, to address this issue. Given that the JCS is at least a year behind the Stroud Local Plan Review, and probably further, it is very hard to envisage that any such evaluation will have been completed, leading to a renewed request from the City, at any stage before the final pre-submission Stroud Local Plan is published.

Stagecoach notes and welcomes the acknowledgement at Para 2.32 that the District is holding open the potential to allocate land at Whaddon to meet Gloucester's unmet need: *"At this stage, pending further work on the Joint Core Strategy Review, a site at Whaddon is safeguarded in the Plan to contribute to meeting Gloucester's needs. Further work is required with our neighbours before the Local Plan is finalised to agree how Gloucester's unmet needs will be accommodated in full."*

The other site evaluated to meet unmet needs arising in Gloucester, proposed allocation G1 South of Hardwicke ("Hardwicke Green") had not been included in the original Regulation 18 draft of this plan for consultation. It was added, at a subsequent Regulation 18 stage.

Stagecoach has consistently and unequivocally supported the identification of land at Hardwicke Green as one of the most sustainable development options, and initially this was through the preparation of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS). We were perplexed at that time that, given the evident difficulties presented to meeting all the City's needs within its boundary, no options within Stroud had been evaluated or brought forward. It appears that the JCS Inspector broadly reached the same conclusion, and this led to her explicitly requiring a Memorandum of Understanding to be reached with Stroud District Council to bring the site forward, in the context of meeting the City's own requirements.

However while we are supportive that the Council is now intending to make an allocation at Hardwicke Green, we note that this site is proposed to meet the District's own endogenous needs, while Whaddon is, in effect, being considered as a reserve site should it be required to meet Gloucester's needs. At the Regulation Emerging Plan stage it was alternatively suggested, in the same way, that Whaddon too might be brought forward to meet the District's own.

It should be noted that the strategic allocation at Hunts Grove, Hardwicke, which the existing consent dating back to 2008 and the renewal of the current Local Plan Allocation for 750 dwellings (PS30) accounting for up to 2500 dwellings taken together, is also intended to meet the District's own needs, not make any contribution to meeting Gloucester's.

This creates a situation where, **should all this quantum ultimately be allocated in the Plan, as many as 7000 new homes directly adjacent to the Gloucester urban area would have be provided between 2011 and the plan horizon date of 2041, and of these, about 3800 – more than half - are to meet needs arising in Stroud District.**

We must stress that we stand by a view that all these sites are, broadly, amongst the most sustainable options for housing within the Plan area, though some are easier to effect bus service improvements to than others.

While the matter might seem in some way academic, we would strongly disagree. If these relatively sustainable locations on the edge of the City, very well related to existing employment and services as well as future jobs growth, are drawn down to meet the assessed needs arising within Stroud, this simultaneously sets up two problems.

**First, this would represent an unbalanced spatial delivery of new homes to meet the District's OAN.** The new allocations (including PS30 Hunts Grive Extension, G1 South of Hardwicke and G2 Whaddon, but excluding Hunts Grove) would deliver **at least** 4100 additional homes adjoining the city. This represents somewhat over a third of the entire housing need of the District over the period.

This contrasts quite starkly with a broad swathes of the District, there would effectively no delivery to speak of, in particular in the Wootton cluster. Even more pertinent, the amount of development well related to Stroud, the largest settlement by far - and its closely related Tier 2 settlement of Stonehouse - would also be disproportionately low, with only 700 new plots identified, at PS19a North

West of Stonehouse. The high level of physical and landscape constraints around Stroud in no way diminishes the housing needs arising from it, that ought to be met in reasonably close proximity, for economic and social as well as environmental reasons.

**Second, the unmet need from Gloucester that remains to be fully established, requiring accommodation elsewhere beyond the City's boundaries does not "go away" if site adjoining the city are allocated to meet Stroud's rather than Gloucester's needs.** This is likely to be on sites that, given the known physical and other constraints affecting the JCS area, could be well beyond the existing edge of the City, and considerably more challenging to integrate sustainably with the City than either Whaddon and Hardwicke Green. Indeed, in such a scenario, it would be ironic indeed, if screening of options across Stroud, the Forest of Dean and Tewkesbury, indicated that a new or expanded community south of the City in the Whitminster area were among the most sustainable remaining options, as indeed such an exercise might well, in our view. This would lead to a possible situation where Stroud's needs were being met adjoining Gloucester and the City's very close to Stonehouse.

We are consistent in holding a view that housing need should as far as possible be met closest to where such need arises. While we support both draft allocations G1 and G2, on the grounds of their inherent sustainability, we therefore have **significant concerns that the current approach to meeting identified unmet need from Gloucester is sufficiently justified or appropriate.**

(Continue on a separate sheet /expand box if necessary)

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.

**Policy CP2 should be altered such that:**

*"Stroud District will make a contribution to meeting **the immediately identifiable** unmet housing needs of Gloucester City ~~for~~ **within the first 10 year of the Plan period** by providing for growth at the following location:*

**G1 Land South of Hardwicke: 1350 dwellings**

*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, Stroud District will make a contribution to meeting the unmet housing needs of Gloucester City **over the longer term** at the following location:*

*G2 Land at Whaddon: at least 3000 dwellings*

We accept that this then requires additional sites to be identified consistent with the spatial strategy of the Plan. We consider that site WHI014 Land at Grove End Farm Whitminster represents a clear opportunity to rebalance the spatial strategy appropriately, providing for the District's housing needs closest to the largest concentration of population, activity and employment at Stonehouse and Stroud.

(Continue on a separate sheet /expand box if necessary)

**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

**Yes**, I wish to participate in hearing session(s)

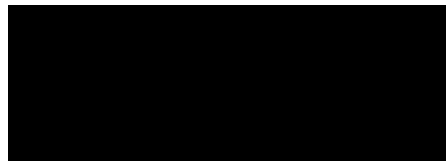
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

See main representation on Evidence Base and District-Wide Policies

**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:

