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 5.47- 5.53	Policy E10/E11	Policies	з Мар				
4. Do you consider the Local Plan is :							
4.(1) Legally compliant	Yes	X	No				
4.(2) Sound	Yes		No				
				x			
4 (3) Complies with the							
Duty to co-operate	Yes	х	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.

Tourism

5.47 - 5.53 Gloucestershire Tourism Data sets – the section here relies on older data and more generic evidence bases, and not the most relevant up to date research

Tourism strategy co created with Gloucestershire districts in 2020-21 and which is data rich on the latest intelligence on tourism

The evidence base including the Covid 19 Recovery Planning and Map of Gloucestershire's current Visitor Economy provided through the Visit Gloucestershire Partnership should be referenced and used here

Also note that within the Delivery policy Delivery policy there is no current Destination Management Organisation in Stroud and recognition of the the need to address the key gap this has created

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 tourism section should build on the 2020-21 evidence base including the comprehensive mapping and data of the current visitor economy and its emerging strategy

Copies of the data can be provided although Stroud District Council will have this in their possessions because of their involvement in the Tomorrows Tourism project work and the Visit Gloucestershire Partnership

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)

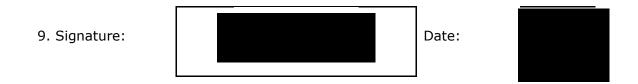
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

To ensure that community needs relating to tourism and visitor economy, are properly reflected

There needs to be greater reliance on key local data and opinion, supported by hyperlocal and inclusive evidence in this area. Gloucestershire Community Rail Partnership (which includes Visit Gloucestershire as a key partner) are able to support in this area and to explain the relevance of local evidence collected in an inclusive and throughout manner, giving the depth of community insight needed for a resilient policy base

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.



Part B - Please use a separate sheet for each representation

Name or Organisation:				
3. To which part of the Lo	cal Plan does this rep	oresentation	relate?	
Paragraph 5.54-5.78	Policy Travel and Transport	Policies Map		
4. Do you consider the Lo	cal Plan is :		<u> </u>	
4.(1) Legally compliant	Yes	х	No	
4.(2) Sound	Yes		No	x
4 (3) Complies with the				^
Duty to co-operate	Yes		No	х
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.

There are a number of key issues relating to the travel and transport section

In turn these are

EI12/DEI1 and DEI1 5.70 and para 5.70 - There is no mention of working with GCRP as a community led organisation that will lead on support with grass root intelligence to inform planning policy. Although not a statutory consultee the Local Plan should now reflect the status conferred on it within Gloucestershire County Council LTP4 refer Policy LTP PD 5.3

Overall reflection of the key role that GCRP can play in plan making and delivery and the community-based nature of the evidence, which can inform other areas of the Plan (e.g. new housing etc) and infrastructure needed

Addressing the role of the GCRP Developer Guide – Connecting New Communities to Rail and how that can be embraced through the delivery policies

Policy E12 – in particular reflecting on the role of GCRP and the local evidence base feeding into creation on the optimum sustainable transport infrastructure associated with new development. Ensuring that the best quality local data and information is used on a site-by-site basis is critical, and now that there is a method for engaging and collecting that, this hyperlocal form of data collection and evidence should be used.

An example of this is feeding our 2020/21 travel survey results specific to the Stroud and Stonehouse area into pre-application preparations so that developers are reflecting true local needs and accessibility issues into their transport assessments and travel plans.

Stronger reflection of 'last mile' connectivity from new development to rail is needed and specific mention of how key stations (e.g. Stonehouse, Cam and Dursley) act as key railheads linking to large new housing areas.

Inclusion of the latest data and evidence from the JCS sustainable transport strategy also needs to be referenced and brought into play.

As a whole the transport section needs to align with the LTP4 and also we would expect the granularity of evidence and detail to be reflected in the 'Stroud' geography – therefore active recognition of the GCRP is also important

Youth and outward migration trends also need to be mentioned and clear explicit recommendations made as to how the travel and transport section actively encourages (or may even discourage) job seeking within the County. Data intelligence will also be made available from the recent Youth Travel Survey conducted by GCRP

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 cooperate 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.

In order to address the gaps and issues raise above, please note that GCRP are able to provide

Examples of the datasets we have already collected include

 Youth Travel Survey - through SDYC covering Stroud and wider Gloucestershire (refer to link to view survey questions and please note data analysis is in progress) https://www.smartsurvey.co.uk/s/preview/GlosYouthTravelSurvey/474B2C310 F7C4215AC5D9AD29C3D6F

- Input into the Visit Gloucestershire/Tomorrow's Tourism strategy
- Travel Needs Survey (2020/21) covering community organisations and individuals across Gloucestershire and in the Stroud District areas – sent with this submission
- Development Guide/Protocol and LTP4 recognition of GCRP also attached to this submission

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: **please see below and reference to evidence base**

To ensure that community needs relating to tourism, visitor economy, transport and are properly reflected

There needs to be greater reliance on key local data and opinion, supported by hyperlocal and inclusive evidence in this area. Gloucestershire Community Rail Partnership are able to support in this area and to explain the relevance of local evidence collected in an inclusive and throughout manner, giving the depth of community insight needed for a resilient policy base

Examples of the datasets we have already collected are covered above and may be helpful to the ongoing SDLP process

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: