

# 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	<b>X</b>	No	
4.(2) Sound	Yes		No	<b>X</b>
4 (3) Complies with the Duty to co-operate	Yes	<b>X</b>	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.

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.

**Delivery Policy E19: Floorspace thresholds for Impact Assessments**

Policy EL9 is unsound in respect of consistency with national planning policy thresholds for impact assessments. The proposed threshold for the local centre at the Whaddon strategic site is 500sq m. The default threshold advised in NPPF paragraph 89 is 2,500 sq m albeit it also recognised that local thresholds can be set by LPAs. However, the context of the proposed Whaddon local centre is distinctively different to other settlements within Stroud District, with the obvious relationship to urban Gloucester immediately adjacent. A local centre at Whaddon would not compete or undermine the scale or function of the retail offer in Gloucester City, and thus the threshold of 500 sqm for an impact assessment is considered unreasonably low. A lower threshold may be acceptable for other parts of the District where the retail function of local town and village centres is more fragile to change, but that is not the case in respect of the strategic and large scale retail function within Gloucester City Centre.

Furthermore, the provision of local centres on strategic development sites promotes self-containment in promoting more sustainable patterns of movement rather than competing with retail provision in town centres, and therefore strategically allocated local centres should be a confirmed exemption.

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 threshold for an impact assessment for the anticipated Whaddon local centre should be increased. It is suggested that a threshold more akin to the NPPF default threshold of 2,500 sq m should be applied.

**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 to partake in general discussions regarding policy EI9.

**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: