

Part B – Please use a separate sheet for each representation

Name or Organisation: **Charterhouse Strategic Land**

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

Please see enclosed representation

Please see enclosed representation

(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.

Please see enclosed representation

(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, 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:

The matters raised in this representation and with respect to other policies, paragraphs and objectives of the Local Plan together raise complex concerns as to the soundness of the Plan.

This will require detailed evidence to be presented to the Local Plan Inspector to ensure that the matters are fully discussed and properly considered, including the inter-relationships between matters, leading to appropriate modifications and changes.

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.

Stroud District Council: Pre Submission Draft Local Plan Review (May 2021)

Representation Concerning Policy DHC1

For and on behalf of: Charterhouse Strategic Land

July 2021

Introduction

1. Chilmark Consulting Ltd (CCL) are instructed by and write on behalf of Charterhouse Strategic Land (CSL).
2. CSL has an interest in land at Clattergrove in Painswick. The Site is situated to the north of Painswick immediately adjacent to the A46 Cheltenham Road¹.
3. Representations have been submitted on behalf of CSL to Stroud District Council (SDC) at all of the earlier stages of the Local Plan Review in 2018, 2019 and in 2020.

Representation

4. This representation is concerned with **Policy DHC1** (Meeting Housing Need Within Defined Settlements) as set out at page 232 in the Pre-Submission Draft Local Plan (May 2021). It must be read in conjunction with CSL's other submitted representations concerning the Local Plan Review².
5. Policy DHC1 is intended to add detail to the interpretation and application of the Core Policies according to paragraph 3.430. In this case, one of the relevant Core Policies for new housing is Policy CP8.
6. Policy CP8 states:

¹ CSL's separate representation concerning omission of their site from the Local Plan includes details about the site and a plan showing its location in Painswick

² CSL has raised other separate objections regarding: the Cotswold Cluster Strategy; Figure 3; the Plan's Vision and Strategic Objectives; and Policies CP2, CP3, CP7, CP8, CP9, DHC1, PS41; and concerning the omission of their land interest at Clattergrove, Painswick

“New housing development must be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing, to create mixed communities. New developments must take account of the District’s housing needs, as set out in the Local Housing Needs Assessment. In particular, on major sites, the expectation will be that the range of types, tenures and sizes should reflect the housing needs identified for that Parish Cluster area”.

7. Paragraph 4.14 identifies that the Council’s Local Housing Needs Assessment (LHNA) identifies the needs for market and affordable housing in the District for the plan period. It continues, noting that it is important for new housing to meet the needs of different groups in the community as identified in the LHNA in terms of types, tenures and sizes.

8. Policy DHC1 states:

“At all settlements with defined settlement development limits, permission will be granted for residential development or redevelopment within those defined settlement development limits, subject to the satisfaction of detailed criteria defined for meeting housing need at settlements”. [Our emphasis].

9. CSL has objected (see separate representation) to Core Policy CP8 as it is not effective as it is drafted. The same problem arises for Policy DHC1 which requires specific, detailed, criteria defined for meeting housing needs at settlements to be met.

10. Policy DHC1 does not specify the criteria to be met. The supporting text at paragraph 4.33 explains that Policy HC1 (page 237) identifies the criteria to be considered under Policy DHC1.

11. Policy HC1 (Detailed Criteria for New Housing Developments) does set out criteria for housing developments. However insofar as housing needs are concerned that policy simply refers to *“where appropriate schemes should include a variety of dwelling types and sizes, which meet identified local needs”* (bullet 2) and no further assistance is given in that policy (or its supporting text) as to what housing needs are, at what geographic scale these should be considered (settlement, Parish Cluster or District) or where that information may be found.

12. The District's housing needs are established by reference to the LHNA. There is however no published evidence or any assessment or understanding in the Plan itself as to the range of types, tenures or sizes of dwellings needed for specific Parish Cluster areas. The LHNA does not provide sub-District housing needs analysis.
13. Policy DHC1 is vague and uncertain with respect to meeting housing needs. It is not an effective policy and is actually written in an entirely confusing manner, contrary to the National Planning Policy Framework at paragraph 16(d).

Conclusion

14. Policy DHC1 is not:
 - **Effective** – the policy is vague and uncertain. There is no published evidence or information for the housing needs of Parish Cluster areas. These needs are not set out in the policy, its supporting text or with reference to other policies including CP8 and HC1. The Plan's evidence base does not assist with any detailed information as to the housing needs at a sub-District level.
 - **Consistent with the National Planning Policy Framework** – the policy is not consistent with paragraph 16 (d) that requires plan policies that are clearly written and unambiguous so that it is evident how a decision maker should react to development proposals.

Modification and Remedy

15. The Plan requires additional evidence and modification of Policy DHC1 to:
 - a) re-draft the whole policy wording in a clear and understandable manner; and
 - b) set out precisely what the local housing needs for settlements and Parish Cluster areas are and where that evidence may be found. This is not an unreasonable level of detail or expectation given the importance set out in the Plan of meeting local housing needs of different communities in the District. The additional evidence should extend the work and analysis for the District set out in the LHNA.