

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

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: Vision and Strategic Objectives

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 **Section 2.1** (Vision to 2040) and **Section 2.2** (Strategic Objectives), particularly **SO1** (Accessible Communities) as set out 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 Review.

Plan Vision

5. The overall Stroud District Vision to 2040 (page 19) is supported.
6. There is however a need for the Vision to reflect the important contribution that smaller settlements (such as Painswick) in the defined Parish Clusters play in terms of the potential to provide new housing, employment and services in order to protect and enhance social and economic sustainability.

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

7. As written the Vision fails to make an explicit reference to the importance of support for sufficient growth to be directed to smaller towns and settlements.

Strategic Objectives: S01

Meeting Housing Needs

8. The Strategic Objectives are welcomed in general. CSL does however object to SO1 (Accessible Communities) (page 20) as this Objective does not include a clear and unequivocal statement that the future housing requirements of the District will be met in full to ensure that there is a sufficient quantum, choice and mix of housing available to meet future needs.
9. Without explicit recognition in SO1 it is concluded that this Objective is too imprecise and is not consistent with the National Planning Policy Framework at paragraphs 20 (a) and 59 and does not therefore provide the basis for a sound spatial strategy.

Alignment of SO1 to the Plan's Spatial Development Strategy

10. CSL is also concerned that the reasoned justification text to the Strategic Objective SO1 at paragraphs 2.3.31 et seq. identify that the Plan will support SO1 including through small scale development within rural communities to help address specific local needs. There is not however a clearly defined or identifiable relationship set out in the Plan between SO1 and the development strategy.
11. The proposed levels of new housing growth for smaller settlements (including Painswick) and more rural areas as set out in Core Policies CP2 (Strategic Growth and Development Locations) or CP3 (Settlement Hierarchy) is mismatched to the aims of SO1; see CSL's separate representations concerned with those Core Policies.
12. CSL are concerned that there is not any evidence in the Plan or its supporting evidence documents as to the actual housing sub-district level needs (or other employment and service needs) of smaller settlements (including Painswick) and it is not therefore clear how the Local Plan's Strategic Objective SO1 can be

effectively aligned with the development strategy and how performance of the policies in meeting this Strategic Objective will be measured.

Conclusion

13. In summary, the **Vision and Strategic Objective SO1** are unsound because they are not:
- **Positively prepared** – there is a lack of reflection in the Vision of the contribution that smaller settlements play in terms of the potential to provide new housing, employment opportunities and services. Strategic Objective SO1 is also not positively prepared as it fails to include explicit recognition of the need to meet housing needs in full in terms of quantum, choice and mix overall and for different areas of the District;
 - **Effective** – the Plan’s development strategy and Strategic Objective SO1 are not aligned. The proposed levels of new housing growth for smaller settlements (including Painswick) and more rural areas as set out in Core Policies CP2 (Strategic Growth and Development Locations), CP3 (Settlement Hierarchy) and CP4 (Place-Making, aligned with the Parish Cluster visions) are mismatched. This is not representative of an effective approach;
 - **Consistent with the NPPF** – SO1 is too imprecise and is not consistent with NPPF 20 (a) and NPPF 59.

Modification and Remedy

14. The situation is capable of remedy by modification of the Vision to 2040 and to Strategic Objective SO1 as follows:

Vision to 2040

15. A new paragraph should be added to set out an explicit statement as to the importance of supporting sufficient housing and economic growth to be directed to smaller towns and settlements in the District.

Strategic Objective SO1

16. A new bullet point should be added to SO1 to confirm that the future housing requirements of the District will be met in full to meet future needs of communities.