

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 CP3

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 **CP3** (Settlement Hierarchy) (page 55) 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.
5. CSL supports the designation of Painswick as a Tier 2 ('Local Service Centre') through Policy CP3. It is evident that Painswick plays an important economic, housing and social role and function at the heart of the Cotswolds Parish Cluster. economic and social and that the Local Plan anticipates that Local Service Centres will grow in order to provide jobs and homes and sustain and enhance

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

services and facilities as well as promoting greater self-containment and viable communities.

6. Painswick is the main centre for the Cotswold Cluster. The characteristics of the town as set out in the Settlement Role and Function Study: Update 2018 (May 2019) from page 78 identifies Painswick as having an aging and increasingly economically inactive population. It did not note the more recent population trends here that show an overall decline in the total population of 89 people since 2010/11. The Study also noted the range of services and facilities available (although not that there has been a consistent erosion and loss of these over the past decade). The Study identified Painswick as performing a largely dormitory role with little by way of a substantial employment base. Indeed, the Cotswold Cluster mini-vision and description of Painswick in Section 3.8 of the Plan) (pages 211 et seq.) confirms the changing demographic and economic characteristics and also highlights a strongly increasing level of unaffordability of the available housing stock. The Settlement Role and Function Study affirmed housing affordability as an “acute issue” (page 79).
7. Policy CP2 (Strategic Growth and Development Locations) offers only one new housing site allocation in Painswick (indeed in the Cotswold Cluster) for up to 20 homes (PS41 – Washwell Fields). This figure is too low and the allocation is not deliverable in any event².
8. It is critical that the Local Plan provides for greater levels of housing growth (in accordance with the NPPF at paragraph 11a, 20 and 35a) for Painswick in order to address the existing challenges evident in the settlement and in order to actually meet the objectives of Tier 2 centres described in Policy CP3 as:

“market towns and large villages with the ability to support sustainable patterns of living in the District because of the services and employment opportunities they offer”.

² See CSL’s separate representations with respect to Policy CP3; and also concerning the development and growth of Painswick in the Cotswold Cluster ‘Making Places: Shaping the Future of the Cotswold Cluster section of the Local Plan

9. Without positive planned growth in Painswick there will be a continuation of current trends, including:
- an ageing population and imbalanced demographics in terms of age background and social class;
 - unaffordable housing stock, skewed to larger expensive properties;
 - issues with the long-term viability of key retail, community and social services and facilities;
 - an increasingly socially exclusive, rather than inclusive community, with people increasingly unable to afford to live or work in the area and a growing reliance on visitors to support services and facilities.
10. The Plan makes these threats and challenges clear in Section 3.8. It does not however address (either in the Plan or its supporting evidence) a fundamental concern that the Painswick Parish population has declined by 89 persons since 2010.
11. If the population continues to fall, this places even greater pressure on the balance of the overall population, the viability of services and facilities and the ability of Painswick to act as a service centre and provide for its, and the surrounding Cotswold Cluster's needs.
12. If Painswick has lost population in a period where, as the Plan admits there has been low housing supply, then a very small single residential development allocation (PS41) for the Cotswold Cluster (current population is some 6,000 people) is highly unlikely to reverse any of the challenges highlighted by the Plan.
13. The solution in CSL's view is to plan for and allocate a greater level of housing (and potentially business space) to ensure that the future of Painswick and the Cotswold Cluster does reflect the Vision (set out in Section 3.8 of the Plan) that seeks to:
- rebalance the population and reverse population decline;

- provide a wider range of new houses, to rebalance the existing deficiencies and provide working families and newly forming households the opportunity to stay or live in Painswick, rather than move out of the area;
 - provide greater security and certainty around the viability of key services and facilities; and
 - ensure a more balanced and inclusive community.
14. The Plan also has an understandable focus on carbon reduction, one of the key ways of supporting this agenda is to make sure that rural communities, and the local service centre, Painswick, at the heart of the Cotswold Cluster are more self-sufficient and less reliant on private car journeys to access employment, services and facilities.

Conclusion

15. In summary, the identification of Painswick as a Tier 2 centre in Policy CP3 properly recognises the importance of the settlement and centre within the Cotswold Cluster.
16. However when reading across the Local Plan's policies taken as a whole the level of housing growth proposed for Painswick does not, in CSL's view, represent a sufficient quantum (a maximum of 20 dwellings – representing a growth rate of one dwelling per year over the plan period) capable of supporting sustainable patterns of living or addressing the demographic, economic and social challenges evident in Painswick.

Modification and Remedy

17. The situation is capable of remedy by modification of the Local Plan policies and supporting text (as set out in CSL's other, separate, representations³) to identify a greater level of housing growth for Painswick in order to support the settlement's critical role and function in the Cotswolds Cluster and in order to address the

³ 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

significant demographic, economic, social and housing market challenges evident in the settlement.