

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	<input type="text"/>	Policy	<input type="text" value="3.8
Cotswolds
Cluster"/>	Policies Map	<input type="text"/>
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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)

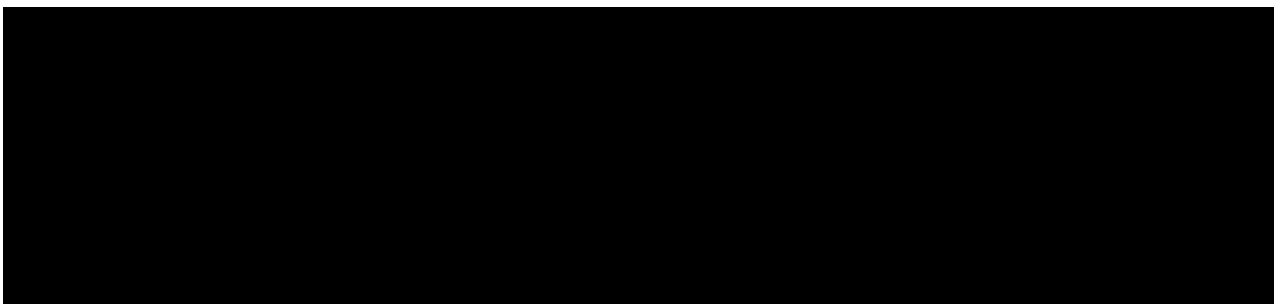
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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: Making Places, Cotswolds Cluster

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 the **Making Places: Shaping the Future of the Cotswolds Cluster** (Section 3.8) as set out from page 211 in the Pre-Submission Draft Local Plan (May 2021). It should be read in conjunction with CSL's other submitted representations concerning the Local Plan Review.

Background

5. CSL has carefully reviewed and examined the objectives, policy approach and supporting evidence that the Local Plan sets out with respect to the Cotswolds Cluster including Painswick.

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

6. Core Policy CP4 (Place-Making) is the underlying plan policy that directs development proposals to accord with 'Mini-Visions' for each Parish Cluster area. The 'Mini-Visions are described at paragraph 2.9.20 as:

“reflecting the distinct qualities, issues, constraints and opportunities that exist in different parts of the overall area”.

7. The Cotswold Cluster area is identified in Map 4 (Spatial Vision for the Stroud District up to 2040) (page 67) and in greater detail at Map 12 (Spatial 'Mini Vision' for the Cotswold Parishes up to 2040).

8. The Cluster is defined as an area that includes the five parishes of Painswick, Bisley-with-Lypiatt, Miserden, Cranham and Pitchcombe with a specific Vision for:

“Protecting and enhancing all the things that will make the Cotswold a thriving and inclusive place to live, as well as a great place to visit”.

9. Painswick is identified as the largest village and a Tier 2 “Local Service Centre’ settlement in accordance with the Settlement Hierarchy established in Core Policy CP3.

10. The Cotswold Cluster Vision to 2040 (page 212) identifies Painswick as continuing to play an important role as a service provider for surrounding communities as well as drawing in visitors. To support this, the Vision states that:

“some growth will reflect its [Painswick’s] role within the area and will help to meet housing needs, maintain and improve the vitality of the town centre and support local services”.

11. Paragraph 3.8.3 summarises where the Cotswold Cluster is now (drawing from the evidence base set out in the Settlement Role and Function Study Update 2018). It highlights Painswick at the heart of the rural parishes in the Cluster and identifies that:

“rural life is changing with fewer people now working in the villages and residents commuting long distances to work. There has certainly been a decline in village services in modern times. Housing affordability is an issue – average house prices here are amongst the highest in the District. Owner-occupation levels are high compared to elsewhere in the District, while levels of social housing are very low. A very high proportion of residents are retirement aged”.

12. Paragraph 3.8.4 then distils the key issues and top priorities for the future in the Cluster. Of particular interest with respect to future growth and change are:

- creating resilient, rural, lifetime communities to enable people to live affordably and work in the area;
- maintaining and improving the vitality of Painswick town centre; and
- ensuring adequate provision of smaller properties to allow for starter homes and opportunities for downsizing for local people.

13. Guiding principles for the Cluster’s spatial development and growth are described at paragraph 3.8.5 including:

- the area will see no strategic development in the plan period;
- appropriate development will be supported to sustain Painswick in its role as a Local Service Centre, a provider of services and facilities to surrounding communities; and to enhance Painswick’s secondary role as a destination town for visitors and tourists;
- very limited levels of development to address specific local housing or other needs are supported at other settlements in the Cluster;
- conserving and enhancing high quality and distinctive characteristics of the Cotswold AONB. There will be no strategic growth within the AONB where any minor development must meet specific local needs

14. The effects and implications of this Vision and approach are considered in the following sections.

A Disconnected Strategy

15. There is a clear disconnection between the Local Plan's Vision for the Cotswolds Cluster and Painswick with the Plan's policies and objectives to promote growth and address demographic balances and population decline in Painswick.
16. Indeed, this is shown in sharp focus by the single proposed residential development allocation across the whole of the Cotswolds Cluster through PS41 (Washwell Fields, Painswick) for a total of up to 20 new dwellings² in the plan period. No other residential land allocations are proposed anywhere in the Cluster, nor indeed are there any other site development allocations or proposals for economic, social or community facilities.
17. The additional 20 units proposed for Painswick represents a very small dwelling stock increase³ of only 1.3% from the 2011 base (and 0.6% for the whole Cotswold Cluster) and below the District's increase⁴ of 23% in the same period). It represents a development rate of only one new dwelling per year over the plan period.
18. Such a low level of proposed growth cannot realistically address either the quantum of housing needed or make any meaningful impact on the types and mix of housing available in the Cluster or Painswick (noting that the existing housing stock is skewed towards larger detached and semi-detached housing with high purchase prices and rental values).
19. The latest available population and housing data (published by ONS and the Land Registry) since the preparation of the Settlement Role and Function Study Update 2018 identifies further and compounded demographic and housing challenges in the Cotswolds Cluster and for Painswick Parish that are not effectively taken into

² CSL has serious concerns as to the deliverability of site PS41 as set out in their separate representation

³ Calculated as 2011 dwelling stock with 2011-20 housing completions (sourced from Stroud District's Five Year Housing Land Supply report)

⁴ Taking the District figure from 2011 dwelling stock plus completions, and expressed as 630dpa x 20 years (12,600 dwellings) percentage increase

account in the Plan, contrary to NPPF 15 and NPPF31. The most recent evidence from ONS, HM Land Registry sources shows:

Demographics and Population

- a) a declining population, linked to unaffordability and low levels of new suitable stock;
- b) a rapidly ageing population, more deaths than births, and significantly less young and younger middle aged population than District average;
- c) a far higher proportion of retired population; and of those residents who work significantly more work in managerial or professional occupations. This imbalance is also reflected in social class, with far more people in Painswick Parish in Classes A and B (48%) compared to Stroud District as a whole (28%);
- d) a higher proportion of single person households. In 2011 Painswick had 1,403 households, of these 425 of were single person (30.3% of the total) and of these 285 were aged over 65 years. This is significantly greater than the District's proportion;

Housing Stock

- e) Painswick Parish is characterised by a skewed housing stock comprising many larger and more expensive properties than the District as a whole;
- f) 64% of owned four bedroom properties had only one or two people living in them: a significant level of under-occupation. This amounts to 357 properties across the Parish area;
- g) 57.4% of the housing stock was detached dwellings, representing a far greater level than the Stroud average (36.5%). 78% of the Painswick Parish housing stock was owned (compared with the average for England at 63%) but only 6.1% of the housing stock was social rented compared to 12.8% for Stroud District as a whole;
- h) an average house price of £578,000 from sales in 2020 (41 sales in total in the Parish area);

- i) a higher share of the housing stock is four or more bedrooms than Stroud District and there are lower proportions of one, two and three bedroom accommodation compared with the District;
- j) in 2011 9.2% of the housing stock was unoccupied (holiday use or second home) more than double the Stroud District rate (4.4%);
- k) Social Rented stock is likely to have declined as there have been no new additions to the stock and the Right to Buy process has eroded the existing stock. The use of existing stock for holiday accommodation also appears to have increased;

Affordability of Housing

- l) the Cotswold Cluster has the greatest affordability ratio (i.e. most unaffordable) across all of Stroud District standing at 11.94:1 for all properties and 15.45:1 for detached properties. Nationally the Cotswold Cluster has an affordability ratio within the highest 13% across 7,206 Medium Super Output Areas (MSOAs) representing an acute and worsening affordability position.
20. There is a failure in the Plan to connect the evident demographic imbalances, restrictive housing market characteristics and dynamics, and decline in Painswick town services and facilities over time⁵ with a positive and progressive strategy of growth and change.
21. Put simply, there is a complete lack of positive or proactive policy response in the Plan to the issues and challenges faced in Painswick or the Cluster. The Cotswolds Cluster vision, policies and objectives will not be effective in addressing the identified issues and challenges facing the area. The Plan is fundamentally flawed and unsound in this critical respect.

Identification and Evidence of Local Housing Needs

22. The Plan makes various references in the Vision, objectives and issues / challenges for the Cluster and for Painswick settlement concerning the need to

⁵ Stroud Settlement Role and Function Study Update 2018, pages 78 et seq.

address “*local housing needs*” and to using residential development as a way to help sustain and enhance Painswick’s role and function as a local centre.

23. The Plan has not stated what local housing needs are for the Cluster or for Painswick and they are not detailed in any evidence base document either. The approach is therefore either arbitrary or has not been disclosed in breach of the expectation of transparency in respect of the evidence base.
24. The Gloucestershire Local Housing Needs Assessment (2020) (GLHNA) provides a total housing requirement for the whole of Stroud District and the Local Plan (Policy CP2) updates this to 630 dwellings per annum. The GLHNA also identifies a need for some 424 affordable homes per annum over the plan period. It does not offer any breakdown of those total requirements or apportion needs at a sub-District level.
25. The Stroud District Settlement Role and Function Study: Update 2018 identifies sizes and growth rates of each settlement as at 2011 and in 2018. For Painswick the Study found a total stock of 1,248 dwellings as at 2011 and a projected total dwelling stock of 1,268 as at 2018.
26. There is no published evidence or information that establishes local housing needs for the Cotswold Cluster or for Painswick settlement. The last housing needs evidence for Painswick was based on a survey⁶ of 1,556 residents with a 32% response rate dating from 2010 and is plainly out of date.
27. There is no published evidence of the level, type or mix of housing required to address local needs within the Cotswold Cluster or for Painswick. The District-level analysis does not reflect the particular local housing supply and demand dynamics evident in the Cluster and is not a realistic substitute for a more localised analysis of needs. This is especially important given the Local Plan’s various statements in Section 3.8 (and also Policies CP7, CP8 and CP9) that housing growth is to reflect local needs and evidence.
28. Plan Policy CP2 makes a distribution of 20 new dwellings for Painswick settlement (the only allocation within the Cotswold Cluster). There is no evidence base

⁶ As reported in Painswick Beacon June 2010 at page 14: [jun10.pdf \(painswick.net\)](#)

supporting this quantum of housing as the appropriate level to address local housing needs. Equally, there is no explanation as to how this can change the low historic levels of housing growth, remedy evident demographic imbalances, or resolve the economic and social harm that has already arisen by treating the Cluster and Painswick as a “dormitory” settlement⁷.

29. It is also of concern that there is no resilience or flexibility for housing delivery in the Cluster as:
- the single proposed residential allocation in the Cotswold Cluster at PS41 (setting aside concern that the site is not deliverable at all⁸) may yield only 10 – 15 dwellings in total (rather than 20 units sought) given the site specific characteristics and limitations of PS41; and
 - there is a significant risk of under-delivery (or non-implementation) of the proposed housing site allocation in Painswick and with no other residential development sites proposed, other than a reliance on ‘windfall’ sites, the Plan has no positive mechanism to support housing to meet needs in the Cluster or for Painswick settlement.
30. The quantum of new dwellings proposed is not sufficient to help support the future vitality of Painswick, address any of the key issues and challenges described in the Plan or achieve the Vision for the Cotswold Cluster.

Consequences of Level of Future Development Proposed

31. The consequences of the development strategy of very limited levels of future development planned for Painswick (and for the Cluster as a whole) are plain.
32. Painswick has well known and long standing demographic imbalances (an overall decline in population since 2011; an increasing aging population of 65+ years; and a reduction in working age and economically active households). The housing market is significantly restricted and imbalanced with very low levels of stock available to rent or purchase, a strongly skewed stock with detached housing

⁷ Stroud District Settlement Role and Function Study Update 2018 (May 2019), page 78

⁸ See CSL’s separate objection to the proposed residential allocation PS41 (Washwell Fields, Painswick)

over-represented ; and consequently high house sale and rental values which are reflected in acute and worsening levels of unaffordability. The lack of employment opportunities in Painswick and surrounding areas has led to an unsustainable pattern of movement for work (and increasingly for access to retail and other services as existing facilities are lost and not replaced over time).

33. These dynamics are already leading to an atrophication of Painswick and in turn raise concerns the planning strategy for the settlement (and for the Cotswolds Cluster to date) will result in demographic, social and economic harm.
34. The overall level of planned growth is minimal with a negligible level of future growth proposed. It will not address the problems of the area and will certainly fail to deliver the Vision of an inclusive place to live and visit.
35. An alternative approach is needed which proactively seeks to grow Painswick (as a sustainable Tier 2 location) at the centre of a living and working cluster of parishes. The spatial strategy needs to actively address this with a greater focus on new development opportunities to grow and re-balance the population, especially addressing the population losses and help to increase the level of younger and working age households able to live and work in the area.
36. In short, the future housing growth allocation for Painswick must be increased. The Council should undertake additional work to establish a level of housing growth that actually meets needs (quantum, tenure, size and mix) and which addresses the evident demographic and housing market challenges in the Cluster.
37. By way of illustration a planned housing growth rate of some 6 – 8 dwellings per year (a very modest growth rate) for the Cluster, focused on Painswick, would yield some 120 – 160 new dwellings over the plan period. This would help provide a mix and choice of housing that can support demographic re-balancing, population growth (rather than decline) and make a meaningful contribution to affordable housing; all of which are urgently needed in the area if a thriving and inclusive vision is to be achieved.

Conclusion

38. In summary, **Section 3.8 Shaping the Future of the Cotswold Cluster** is not:
- **Positively prepared** – the Section and the single residential allocation proposed do not represent a positive approach to the issues, challenges and risks set out in the Plan from page 211 onwards and do not reflect the Vision for 2040 at page 212 particularly with the objective of ensuring that the Cluster will be a “*thriving and inclusive place to live*”. The spatial development strategy (Policy CP3 and Policy PS41) serve simply to restrict growth and represent a wholly inadequate approach to the future of the Cluster or for Painswick as a Tier 2 settlement and location that clearly plays a central role in the vitality, health and wellbeing of the Cluster. It represents a failure to plan for the area properly in accordance with NPPF 11a;
 - **Justified** – there is a significant gap between the Plan’s Vision for the Cluster and the fundamental issues and risks laid out in the Plan’s evidence as well as from CSL’s own research, with the level of development proposed (a single residential allocation for 20 dwellings). The Plan’s ad hoc, inconsistent and piecemeal response to the issues and characteristic of the Cotswold Cluster and of Painswick are stark. There is no realistic justification (even accounting for the AONB designation) for the lack of development and for the prohibitively restrictive strategy proposed;
 - **Effective** – Section 3.8 is not effective. The proposed strategy and allocation will not address long term issues and challenges identified in the Plan’s evidence base or from CSL’s own research. The lack of sufficient, positive policies and development allocations means that growth is overly restricted and the Plan unlikely to be effective in meeting the Vision for the Cotswold’s Cluster, or for Painswick set out. In addition, proposed residential allocation PS41 (Washwell Fields) is not concluded to be a deliverable site and therefore unlikely to contribute to housing needs in Painswick;
 - **Consistent with the NPPF** – the proposed strategy and distribution of growth for Painswick and the Cotswolds Cluster is not consistent with the NPPF, in particular:

- **NPPF 15** – *The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of the area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings. [and]*
- **NPPF 31** – *the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.*

The Strategy and proposed level of growth fails to take full account of the most up-to-date information as to local demographic, housing market and the socio-economic situation in Painswick or the Cotswolds Cluster;

- **NPPF 77** – *in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.*

The Strategy and proposed level of growth allocated for the Cotswold Cluster does not represent a realistic or adequate response to long-understood local circumstances and the housing allocation does not reflect local needs in terms of the amount, type or mix of housing needed;

- **NPPF 78** – *to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*

The Cotswold Cluster strategy and proposed growth allocation is insufficient to enhance or to maintain the vitality of rural communities in the five parishes including in Painswick. The population decline evident in recent years together with demographic imbalances (away from working age households and increasing elderly population) will

not be addressed such that villages are able to grow and thrive (contrary to **NPPF 20a** and **NPPF 61** that require sufficient provision for housing to be assessed and made in strategic policies).

- **NPPF 83** – supporting prosperous rural economy - *Planning policies and decisions should enable... (d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. [and]*
- **NPPF 85** – *Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should... (f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.*

There is no evidence in the Plan that the growth strategy and distribution of housing or employment will enable the retention of local services or communities facilities in the Cotswold Cluster. There is no specific policy to support local retail, leisure or community / social facilities; and there is no proposed allocation of commercial employment land either. The single residential allocation is de minimis in scale and will not result in sufficient new population or household creation to support a prosperous rural community in the Cluster (NPPF 83), nor does it positively address the role that residential development plays in ensuring the vitality of centres such as Painswick (NPPF 85).

- **NPPF 92 (e)** – *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.*

For the reasons set out previously the Cotswold Cluster strategy and the level and characteristics of residential development allocation proposed for Painswick do not represent a sufficiently positive or proactive approach to ensuring an integrated approach. Painswick

and the other smaller settlements in the Cluster are effectively treated as dormitories in the countryside by the Local Plan. The Vision statement at Section 3.8 makes much about being “*a thriving and inclusive place to live as well as a great place to visit*” but the lack of policies and future development allocations to achieve this are evident. They are almost entirely absent from the Plan. This is not consistent with NPPF 92 (e) and fails to reflect the identified challenges and evident needs.

Modification and Remedy

39. The situation is capable of remedy by:
- a) modification of Policy CP3 to include setting a larger local housing target supported by greater allocations of residential development to Painswick settlement (at the centre of the Cotswold Cluster) in order to address the planning harms arising from the deficient strategy currently set out in the Plan;
 - b) modification of Section 3.8 (Shaping the Future of the Cotswold Cluster) to include:
 - i. deletion of PS41 (Washwell Fields) as the site is not considered deliverable (see CSL’s separate representation concerning PS41)
 - ii. allocation of additional new residential development sites at Painswick, including CSL’s land interest at Clattergrove (for up to 90 dwellings and supporting infrastructure) which is a sustainable, deliverable and well positioned site capable of delivering substantial positive benefits for the settlement and for the Cluster.