

Stroud District Local Plan Review Examination

Response to Matter 10c: Environment – Natural and Historic Environment

For and on behalf of: Charterhouse Strategic Land

February 2023

Introduction

1. This Hearing Statement is for and on behalf of Charterhouse Strategic Land (CSL) (representor no. 865) with respect to the Stroud District Local Plan Review (SDLPR) submitted for Examination by Stroud District Council (SDC).
2. It is concerned with **Matter 10c** (Natural and Historic Environment) as set out in the Inspectors' Matters, Issues and Questions (MIQs) (Examination document reference: **ID-05**).
3. The Hearing Statement has been prepared on the basis:
 - a) that the Inspectors have received and reviewed in detail the representations previously submitted to the Stroud District Local Plan Review Pre-Submission Draft (May 2021) on behalf of CSL.
4. This Statement raises points relevant to the Matter in question in the following sections.

Response to Issue 10

Does the Plan set out a positively prepared strategy for the natural, built and historic environment that is justified, effective and consistent with national policy?

Does the Plan adequately address other environmental matters and are the policies sound?

Landscape Character – Delivery Policy ES7

Question 40: *Is the desire for development to protect or enhance the landscape character consistent with the need for planning to deliver appropriate levels of housing and jobs within the AONB?*

5. Protection and enhancement of the AoNB can be consistent with the need to plan to deliver appropriate level of housing and jobs.
6. It is however essential that there is current evidence of the housing and employment needs in the settlements within the AoNB and that there are sufficient and appropriate sites allocated in the Plan to support long-term settlement vitality and sustainability. This would allow effective planning of development aligned with protection and enhancement of the AoNB.
7. As per CSL's other representations and Matters Statements there is a significant concern that the needs of settlements in the AoNB including, for example, Painswick (in the Cotswold Cluster) are not adequately considered or assessed at a granular level to enable local needs to be properly evaluated identified.
8. Put simply, the scale of new housing proposed in settlements like Painswick is insufficient to meet needs and therefore allow for the proactive and effective planning and development of land within the AoNB (including supporting appropriate protection and enhancement of the AoNB's qualities and character.
9. This is particularly important given that the AoNB designation 'washes over' many settlements entirely and without appropriate development allocations allowing for mix and choice, there would be too great a restriction on future growth to the detriment of the vitality and sustainability of the settlement in question.

10. A good example of this is Painswick in the Cotswold Cluster where a single housing allocation is proposed (Washwell Fields) through site policy PS41 on land within the AoNB. No other land is allocated for development in Painswick (or indeed elsewhere in the Cotswold Cluster) resulting in a lack of resilience and fragility to support necessary development should delivery of that site not be possible¹.

Making the Plan Sound

11. Alternative sites should be identified and allocated in Painswick in order to provide sufficient flexibility and certainty of deliverability over the plan period and to allow for the effective planning of necessary development within a settled urbanised landscape within this part of the AONB.
12. This should include CSL's site interest at Clattergrove, Painswick which is a sustainable and deliverable location for residential development to support the settlement's future needs and can be delivered with appropriate protection and enhancement of the AoNB's qualities and character.

¹ see CSL's separate Hearing Statement (Matter 6i) concerning site PS41 which lays out significant concerns over the development potential and deliverability of that site.