

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

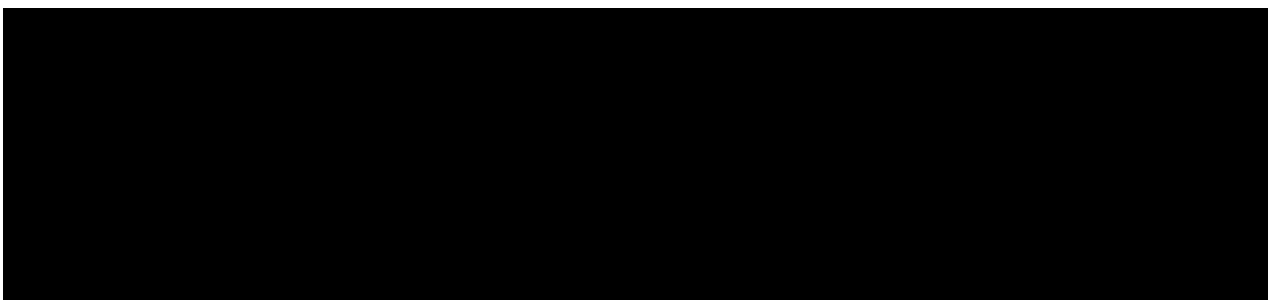
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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 Policy CP2

For and on behalf of: Charterhouse Strategic Land

July 2021

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### 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 Road<sup>1</sup>.
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 2.5** paragraphs 2.5.4 et seq. (Housing Needs and Distribution) (page 33); and **Core Policy CP2** (Strategic Growth and Development Locations) (page 53) 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.

### Overall Housing Requirement

5. Policy CP2, Table 2 and reasoned justification text at paragraph 2.5.4 now identify that the Plan will deliver at least **630** dwellings per annum (dpa) over the 2020 – 2040 period (equating to some **12,600** new homes in total and a residual need for a minimum of **8,000** new dwellings).

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<sup>1</sup> 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. CSL note that the housing requirement has reduced from **638** dpa in the earlier Draft Local Plan (2019) but it appears (although the Plan does not make this clear anywhere) that the slight reduction is due to re-calculation using the latest 2020 housing affordability data and rolling the base year forward as per the Standard Method of assessing Local Housing Needs (LHN), thereby updating work previously set out in the Gloucestershire Local Housing Needs Assessment (2020).
7. Turning to affordable housing needs, the GLHNA identifies an affordable need of 424 dpa (unadjusted). The affordable housing need equates to some 67.3% of the total 630 dpa housing requirement proposed for the District in Policy CP2). There is no published evidence to show that a 424 dpa affordable housing need is actually deliverable? Contrary to the clear expectations of NPPF15 and NPPF 61. Policy CP9 (Affordable Housing) takes the figure at face value without further interrogation.
8. If the Council consider that the affordable need is deliverable and should be met, there is no published evidence as to how this has been reflected into the total planned housing requirement for the District or the proposed total and spatial distribution of housing through Policy CP2?
9. With regard to the NPPF at paragraphs 11a, 20 and 35a it is essential that the Local Plan aims to meet identified housing requirements in full (both market and affordable) during the plan period and has raised this matter during representations made at earlier stages of the Plan's preparation process. Indeed, meeting, in full, the identified housing needs for the District is a critical part of the District's responsibilities to deliver Government's national planning policy objectives and should be properly reflects as such in the Plan's Strategic Objectives (see CSL's separate representation concerning SO1).

### **District Level Distribution and Apportionment of Housing**

10. CSL object to the proposed distribution and apportionment of new housing growth proposed in Policy CP2 and at Table 3 (page 34).
11. The Policy is over-reliant upon Strategic Sites and locations for housing and conversely fails to properly support the long-term sustainability of lower tier

settlements. CP2 and paragraph 2.9.9 establishes that the proposed distribution of housing is directed mainly towards identified Strategic Sites including new settlements and extensions (representing some 78% of proposed housing supply).

12. Housing allocations in smaller settlements (called 'Local Development Sites' in Policy CP2) account for just 9.5% of the proposed supply, with windfall sites making up the balance (some 12.3%).
13. Table 1 below summarises the proposed apportionment showing the imbalance between strategic and local housing site allocations across the District.

**Table 1: Summary Analysis of Proposed housing Supply Apportionment and Distribution**

<b>Supply</b>	<b>Total Dwellings</b>	<b>Proportion of Total Supply (rounded)</b>
Strategic Sites	8,080	78.3%
Local Sites	985	9.5%
<b>Sub-Total</b>	<b>9,065</b>	<b>87.5%</b>
Small Sites Allowance (Windfall) at 75 dpa	1,275	12.3%
<b>Total Proposed Supply</b>	<b>10,340</b>	<b>100%</b>

*Source: Stroud District Local Plan Policy CP2, Tables 2 and 3 and CCL calculation*

14. These figures do not allow for balanced housing distribution through Policy CP2.
15. This is contrary to the Plan's vision to tackle local housing needs and actively address concerns over social cohesion and vitality of communities, including some within the Cotswolds AONB that have had low levels of housing growth but

are constrained and with an aging population set out in paragraphs 2.5.10 – 2.5.13.

16. It also fails to represent a level of growth that will support the Local Plan's 'mini-visions' for Parish Clusters.
17. For example this is especially the case of the Cotswold Cluster which has a strategy aimed at "*protecting and enhancing all the things that will make the Cotswolds a thriving and inclusive place to live as well as a great place to visit*" (pages 211 and 212, Vision to 2040); and a driver for the Cluster (paragraph 3.8.2) to see growth that helps to meet housing needs, and maintains and improves the vitality of Painswick town centre and smaller villages supporting their ability to remain sustainable and thriving communities; and yet where Policy CP2 proposes the allocation of only one site in the Cluster at Painswick (a Tier 2 Local Service Centre) for up to 20 dwellings over the whole plan period.
18. This approach to the distribution of future housing growth is manifestly deficient and contrary to national planning policy. There should be a much enhanced role for smaller, 'Local Development Sites' in settlements such as Painswick (a Tier 2 Local Service Centre) to make a critical contribution towards meeting housing delivery requirements and ensuring an effective five-year housing land supply in addition to the contribution that Strategic Sites might make over the longer term plan period.
19. Local Sites have a distinct advantage in efficient housing delivery as they tend to be less encumbered by constraints; require less new or improved infrastructure prior to development or occupation of housing; and are often built-out relatively quickly as NPPF 68 highlights.
20. Local Sites and Local Service Centre settlements such as Painswick therefore offer opportunities for residential development and, in CSL's view, should be given greater prominence and priority in the Local Plan with appropriate additional sites allocated to enable this.

### Growth at Painswick within the Cotswold Cluster

21. CSL has set out a separate objection as to the Local Plans' proposed approach to growth in the Cotswold Parish Cluster, of which Painswick is the main settlement.
22. CSL object to the proposed level of new housing provision for Painswick (20 new dwellings at one proposed site – PS41, Washwell Fields as set out in Policy CP2). This is simply not an appropriate or sufficient response to the level of housing need in this settlement; indeed there is no published evidence as to the level or characteristics of local housing needs for the Cotswold Cluster or for Painswick itself and there is therefore no way to understand if the Plan's proposed growth strategy will meet local housing needs in this location, although CSL consider that it will not.
23. The proposed allocation for Painswick set out in Policy CP2 fails therefore to demonstrate a commitment to the long term sustainability of key services and facilities in the settlement or for the Cotswold Cluster. It does not adequately support the objectives of Core Policy DCP1 (Delivering Carbon Neutral By 2030) that seeks, *inter alia* to locate new development where the form and mix of development or proximity to essential services and facilities minimises the need to travel.
24. Put simply, the distribution of housing growth set out in Policy CP2 does not ensure that there is a sufficient choice and mix of allocated land at sustainable locations (including Painswick) for new housing so that inclusive, balanced, sustainable communities are created and maintained.
25. CSL object to the proposed level of growth in Painswick shown in Policy CP2 on the basis that it is wholly deficient and conclude that the proposed apportionment of housing should be substantially increased to provide a greater level and choice of potential housing sites.



## Conclusion

26. In summary, the Local Plan's proposed distribution of growth and development locations set out in Policy CP2 together with Tables 2 and 3 is unsound because it is not:

- **Positively prepared** – Policy CP2 represents an over-reliance on Strategic Sites and locations for housing (some 78% of total planned housing supply against just 9.5% for smaller settlements through 'Local Development Sites'). The spatial growth and distribution is not positively prepared as it will fail to properly support the long-term sustainability of Local Service Centres and lower tier settlements, including Painswick. This strategy is contrary to the importance the Plan places on tackling local housing needs and identifying concerns over social cohesion and vitality of communities;
- **Justified** – Policy CP2 does not explain how the proposed level of residential growth for Painswick was established or why, given the role of the settlement as a central focus for the Parish and for the Cotswold Cluster, the level of new housing would meet the needs or address the Plan's vision and objectives for the Painswick or the Cluster as set out in Section 3.8 of the Plan.
- **Effective** – it is not clear how affordable housing needs (stated to be 424 dpa according to the GLHNA and by virtue of Policy CP9) have been reflected into the total planned housing requirement for the District as Policy CP2 sets out and then how that total has been effectively distributed to meet local needs set out in Section 3 and with respect to Policy CP4 (Place Making).
- **Consistent with the NPPF** – at paragraph 11a which requires plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change; paragraph 20 that provides that strategic policies should set an overall strategy and make sufficient provision of housing (including affordable housing); and paragraph 35a which requires plans to be positively prepared providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.

## Modification and Remedy

27. Modification of the Plan is necessary to remedy the deficiencies, by:
- a) Undertaking additional work now to provide evidence (that should be explicitly identified in the supporting text to CP2) to confirm the deliverability and viability of proposed sites to meet the overall planned housing requirement (630 dpa) in the context of the affordable housing need (424 dpa). It should also provide evidence that the identified affordable housing needs can be met and are deliverable. Additionally, it should provide up-to-date evidence (as the NPPF requires at paragraphs 60 and 61) that the total planned level and mix (size, type and tenure) of housing proposed will address evident needs including issues of unaffordability and demographic imbalances in the District and for particular sub-areas including the Cotswolds Cluster;
  - b) the revision of Policy CP2 to provide a more balanced approach to the distribution of housing growth. Greater levels of housing should be allocated for Tier 2 settlements such as Painswick that are sustainable existing service centres and where the Plan identifies critical demographic, housing market, economic and social inclusion challenges in the Plan that future growth can address.