

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 Policy CP8

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 CP8** (New Housing Development) as set out at page 227 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. Policy CP8 states:

“New housing development must be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing, to create mixed communities. New developments must take account of the District's housing needs, as set out in the Local Housing Needs Assessment. In particular, on major sites, the expectation will be that the range of types,

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

tenures and sizes should reflect the housing needs identified for that Parish Cluster area". [Our emphasis]

6. Paragraph 4.14 identifies that the Council's Local Housing Needs Assessment (LHNA) identifies the needs for market and affordable housing in the District for the plan period. It continues, noting that it is important for new housing to meet the needs of different groups in the community as identified in the LHNA in terms of types, tenures and sizes.
7. CSL understand that the District's housing needs are established by reference to the LHNA. There is however no published evidence or any description in the Plan itself as to the range of types, tenures or sizes of dwellings needed for specific Parish Cluster areas. The LHNA does not provide sub-District housing needs analysis.

Conclusion

8. Policy CP8 is not:
 - **Effective** – the policy is vague and uncertain. There is no published evidence or information for the housing needs of Parish Cluster areas. These needs are not set out in the Plan or the published evidence base and the policy as drafted is explicit that for major housing sites residential schemes must take account of the needs of the Parish Cluster.
 - **Consistent with the NPPF** – the policy is not consistent with the National Planning Policy Framework at paragraphs 11a, 20a or 31 as it does not meet the needs of the area; does not make sufficient provision for housing; and is not based upon or prepared in light of adequate, proportionate or up-to-date evidence.

Modification and Remedy

9. The Plan requires additional evidence and modification of Policy CP8 to set out precisely what the local housing needs for Parish Cluster areas are. The additional evidence should extend the work and analysis for the District set out in the LHNA.