

## 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?

### Omission of Site from the Local Plan

Paragraph	<input type="text"/>	Policy	Section 3.8 – Cotswolds Cluster and Painswick	Policies Map	<input type="text"/>
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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)

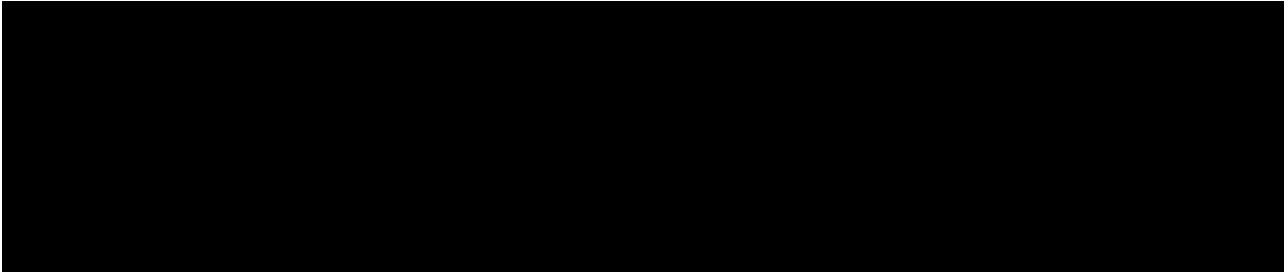
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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: Site Omission Land at Clattergrove, Painswick to the East and West of the A46**

**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 east and west of the A46 Cheltenham Road.
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 omission of CSL's land interest at Clattergrove, Painswick from the proposed residential development allocations 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.

### **Overview**

5. By way of background, the Council will be aware that CSL has positively engaged in the Local Plan Call for Sites exercise through the promotion of its land adjacent to the east and west of the A46 Cheltenham Road, Painswick.
6. The western part of the Site (identified in the Council's 2019 SALA as 'Land at Clattergrove, Painswick', to the west of the A46 - SALA reference PAI013) has been reviewed by SDC, but the eastern parcel (to the east of the A46) has not

been subject to a response from the Council despite being submitted for the Call for Sites exercise in 2020.

7. The combined site area (east and west parcels of land) totals **7.49 hectares** and has the potential to support delivery of 90 new dwellings with associated green space and contributing to appropriate, necessary infrastructure. The extent of the land interest is shown in the appended Site Location Plan.

### **Need for Allocation**

8. The allocation of CSL's land interest at Clattergrove, Painswick is necessary to make the Local Plan sound as it would positively and proactively address the need for new housing in the Cotswolds Cluster and for Painswick as a Tier 2 Local Service Centre settlement which will not otherwise be met due to a lack of sufficient housing growth allocated to Painswick or the Cluster area in the Plan as it is currently drafted.
9. The allocation of CSL's site at Clattergrove, Painswick would also provide a sustainable development opportunity to address the lack of deliverability of the sole proposed allocation at PS41 – Washwell Fields, Painswick<sup>1</sup> for residential use.

### **Physical Attributes and Considerations**

#### Landscape and Visual Characteristics

10. From a landscape and visual appraisal perspective, the Site is located within the 107: Cotswolds National Character Area (NCA) profile and is identified within the district wide Stroud Landscape Character Assessment as a 'Secluded Valleys' Landscape Character Type. In addition, the Cotswolds Area of Outstanding Natural Beauty Landscape Character Assessment classifies the Site as within Landscape Character Type 8 - High Wold Valley.

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<sup>1</sup> See CSL's separate objection to the proposed allocation of PS41, Washwell Fields, Painswick which raises significant concerns as to deficiencies in that site's ability to be delivered for residential purposes including constraints and impacts on highways safety, site access and egress, designated heritage assets and environmental constraints

11. Given the topography of the Painswick area, it is recognised that the majority of the settlement is subject to some long-distance views already. However there are restricted views of the Site from the north towards Cranham (due to woodland) whilst views from the south are limited due to the built form of Painswick.
12. At the local level there is established built form immediately to the east of the Site (at The Park and Damsells Cross) whilst opportunities exist to enhance the Site through appropriate landscaping and local features, e.g. Cotswold dry stone walls to the A46 road frontage. Overall, there is considered to be a positive opportunity to bring forward a comprehensive landscape and visual treatment, which combines our client's land to the east and west of the A46 respectively.

### Ecology

13. The Site is not subject to any nature conservation designations whilst the nearest nationally/ internationally statutory designated site, the Cotswold Common and Beechwoods SSSI, is located circa 250m to the west of the A46 and beyond Gold Course Road. This also includes the overlapping designation of the Cotswold Beechwoods SAC (approximately 1,500m to the north) with all other designated sites at least 2km distant. There are no functional links between the Site and the aforementioned designations.
14. The nearest non-statutory 'local' designations are at Painswick Cemetery (semi-natural grassland, c.200m) and Kemps Lane (toad patrol location, c.900m). Other local sites are more than 1km distant.
15. The Site and its boundaries are not considered to be of particular ecological habitat value in view of the nature and use as managed arable farmland together with the mix of boundary treatments which comprise open areas, hedgerows, drystone wall sections and mature standard trees.
16. An Extended Phase 1 Habitat survey of the Site has been undertaken and noted no major constraints with the exception of a badger main sett (located in the western parcel). The Site is of a low habitat value.

### Flood Risk and Drainage

17. Given its location, the Site lies entirely within the Environment Agency (EA) Flood Zone 1. It is therefore classified as land assessed to have less than 1 in 1,000 annual probability of river or sea flooding (<0.1%), low probability. Furthermore, there is no evidence of watercourses through or along the perimeter of the Site which confirm the absence of any flood risk constraints.
18. In respect of stormwater disposal, Severn Trent Water (STW) has advised the Site's suitability for stormwater disposal direct to ground, via infiltration. This reflects the free draining soilscape characteristics of chalk and limestone deposits. Subject to future investigation, it is anticipated that the Site would offer comparable opportunities for surface water management via ground infiltration alongside opportunities for a SUDs strategy with foul drainage arrangements connecting to the existing network of public sewers systems.

### Utilities

19. The Site is not subject to any known utilities constraints.

### Heritage

20. The Site lies outside the designated Painswick Conservation Area. It contains no statutorily Listed Buildings or Scheduled Ancient Monuments and has no known features or assets of heritage significance.

### Transport and Accessibility

21. The Site is directly accessible from the A46 Cheltenham Road which provides convenient access for cars, public transport, cyclists and pedestrians.
22. In terms of public transport access, the Site is well located and is immediately adjacent to the A46 Cheltenham Road which provides a public transport corridor. A bus stop (services 66 Gold and 228) is located at the northern end of the Site (Clattergrove) together with a bus stop / shelter at The Highlands, to the south of the Site into Painswick. Corresponding bus stops are located on the opposite side of the A46 leading away from Painswick and serving the western parcel of the Site.



23. The Site is within easy walking distance of Painswick with a continuous footpath connection along the A46 that provides access to nearby local facilities to the south, including the Painswick Doctors Surgery located off Gyde Road (400m), Best One convenience store on St Marys Street (800m), Painswick Community Library (850m) and Croft County Primary School (1km).
24. The Site benefits from a continuous frontage to the A46 which provides the potential for a technically compliant junction for vehicular and pedestrian access, set in the context of the existing speed limits.
25. Investigations by CSL demonstrate that a safe and efficient access can be achieved via the A46 Cheltenham Road for both parcels of land, which is also the case for the subject Site. The opportunity exists for a coordinated access solution for both sites which could further help address approach speeds and highway safety at this location in Painswick.

#### **Previous Review and Council Comments**

26. The western part of the Site has been subject to a very cursory, headline review by SDC in the SALA New Sites Update Report (November 2019) at Appendix 4. It appears to have been rejected for allocation at that time due to the likely landscape impact of extending the settlement into the AONB and detrimentally altering the rural character with the potential to coalesce existing, sporadic development.
27. CSL object to the omission of the Site from inclusion in the Local Plan and to the analysis and conclusions reached by the Council in the SALA for the site.
28. Indeed, the Site's allocation for residential development is consistent with the approach for locating growth in Painswick for the benefit of the town and for the wider Cotswold Cluster (page 219 of the Pre-Submission Plan) which states that there is potential for housing growth within or on the northern edge of the town.
29. With appropriate building and landscape design the Site is wholly capable of providing for a mix of new residential dwellings while protecting and maintaining landscape character and visual amenity. It can therefore be developed in the

context and with respect for the character and purpose of the AONB in this area of Painswick.

30. It would not, contrary to the assertion in the SALA's analysis, lead to coalescence as it would about the existing, adjacent residential development which is not sporadic in morphology. It would enable a new, logical and clear boundary for Painswick.
31. The development of the site would not extend the settlement into the AONB as, like all other land in and around Painswick it is already within the AONB designation and would form part of the underlying baseline settled landscape characteristic evident in this part of the AONB.

#### **Wider Benefits Arising from Residential Allocation of the Site**

32. The proposed Clattergrove Site brings a significant package of benefits through the provision of new homes; employment in terms of construction of the development and in the additional new population supporting services in Painswick; and support for community and green infrastructure.
33. These benefits meet all the requirements of the NPPF and together demonstrate that the proposed allocation of CSL's Site can form a sustainable development. It particularly meets the requirements of NPPF by the nature of the potential concept and design and the homes and employment (direct construction period and through indirect expenditure) opportunities to be provided in an integrated manner.
34. The main headline characteristics and benefits of the Site to support its allocation in the Plan are:
  - a) **A compact development:** CSL has a vision for the Site as a very high quality traditional place suited to the settled landscape and townscape character of Painswick and of the Cotswolds AONB. The Site was chosen and advanced as a sustainable development with a holistic approach in terms of role, design, residential mix and contribution to quality of life in Painswick. There is an integral recognition that there is a symbiotic relationship between the future vitality of Painswick as a whole and the

attractiveness of the Site to support social, economic and housing sustainability. This accords with the NPPF at paragraph 127 seeking to secure high quality design and promoting a strong sense of place; 85f concerned with residential development's important role in ensuring the vitality of centres; 83 and 84, concerned with securing sustainable economic and housing growth in rural areas; paragraph 110, which encourages places which promote opportunities for safe, secure and attractive places; 91 to promote social interaction including through mixed use developments, strong neighbourhood centres and active street frontages as well as safe and accessible developments with clear pedestrian routes and high quality public space; paragraph 92, delivering support for social, recreational and cultural facilities as part of an integrated approach to the location of housing, economic uses and community facilities.

- b) **Green infrastructure to help promote healthy communities:** the Site has the potential to provide for high quality formal and informal green spaces and infrastructure. There is sufficient land within CSL's Site to support a strong aesthetic quality and to provide a net bio-diversity gain that reflecting the characteristics of the Site and its setting and representing a community and environmental benefit arising from the allocation of the Site. This assists in meeting the requirements of the NPPF as set out in paragraph 127, concerned with the principles of establishing the quality of development and its functioning over time, establishing a strong sense of place and responding to local character and history, and which are visually attractive; paragraph 118b and paragraphs 155 et seq. avoiding and managing the risks of climate change in terms of flood risk and changes to biodiversity and landscape; paragraph 118a, providing net gains in biodiversity; and the intent of paragraph 174, including planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- c) **Supporting and building a thriving and inclusive role and function for Painswick:** CSL's Site provides a stimulus for supporting local jobs, commercial and social infrastructure in Painswick, integrated and embedded within a strengthened public transport corridor along the A46 connecting more widely to the Cotswolds Cluster. The Site provides the opportunity to

proactively address the evident demographic, economic and housing challenges that Painswick (and the wider Cotswolds Cluster) faces (as set out in CSL's other representations) and accords with the NPPF including at paragraphs: 72, 77, 78, 84, 85, 91 and 92, 102 - 104, 118, 127 and to promote uses that create and sustain healthy, inclusive places.

- d) **Transport connectivity and promoting sustainable movement:** Within the context of its strong orientation to Painswick's existing built area and the town centre as well the excellent public transport connectivity offered along the A46 Cheltenham Road, the Site is capable of contributing to a more sustainable pattern of movement (reducing reliance on private vehicles and commuting away from Painswick for work) and support for local services and facilities (hence helping to reduce Painswick's 'dormitory' role and character and hence greater self-containment). Allocation of the Site can help provide measures to support public transport patronage and an enhanced level of connectivity for pedestrians and for cyclists along the key A46 route and into the surrounding area. The allocation of the Site therefore offers the potential for a combination of connectivity and sustainable transport benefits in accordance with the NPPF at paragraphs 102, et seq. exploiting the opportunities for the use of sustainable transport modes; 104a, aiming for a balance of land uses to encourage the minimisation of journey lengths for employment, shopping, leisure, education and other activities; and paragraphs 108 and 110 ensuring opportunities to promote sustainable transport modes, safe and suitable access and creating places that are safe, secure and attractive.
- e) **Meeting the challenge of climate change and flood risk:** CSL's Site requires no flood mitigation measures and will not suffer from the associated residual management and maintenance liabilities and risks due to its elevated position. This accords with the NPPF at paragraph 155 which seeks to identify development locations and sites that avoid inappropriate development in areas at risk of flooding; and paragraph 157 using the sequential test to steer new development to areas with the lowest probability of flooding.
- f) **New homes to support mix and choice:** the Site's allocation can make a substantial, positive contribution to the provision of new market and

affordable housing in Painswick of up to 90 dwellings of a mix of types, sizes and tenures in accordance with the published Local Housing Needs Assessment and draft Local Plan policy CP9. This will assist Painswick to start resolving long-standing and acute issues of unaffordability in the settlement and the Cotswold Cluster more widely and to address the mismatch of housing stock with the needs of an aging population as well as a need to shift the demographic balance addressing population losses and encouraging younger families and working age households to live in Painswick. This accords with the NPPF at paragraph 8, supporting the economic and social roles of sustainable development by providing housing required to meet the needs of present and future generations; 72 supplying large numbers of new homes through significant extension to existing villages and towns; paragraph 59 significantly boosting the supply of homes; 78 to be responsive to local housing circumstances and reflect local needs deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive, mixed communities.

35. Taken together the Site's characteristics and credentials together with CSL's concept for development represents an accessible, available and sustainable location for new residential development very much aligned to the needs of Painswick and focused on addressing fundamental challenges that the Local Plan identifies, but will fail to resolve (see CSL's separate representations concerning the strategy and approach to the spatial distribution of growth and of the Cotswolds Cluster) without greater levels of growth allocated for this important Tier 2 Local Service Centre settlement.

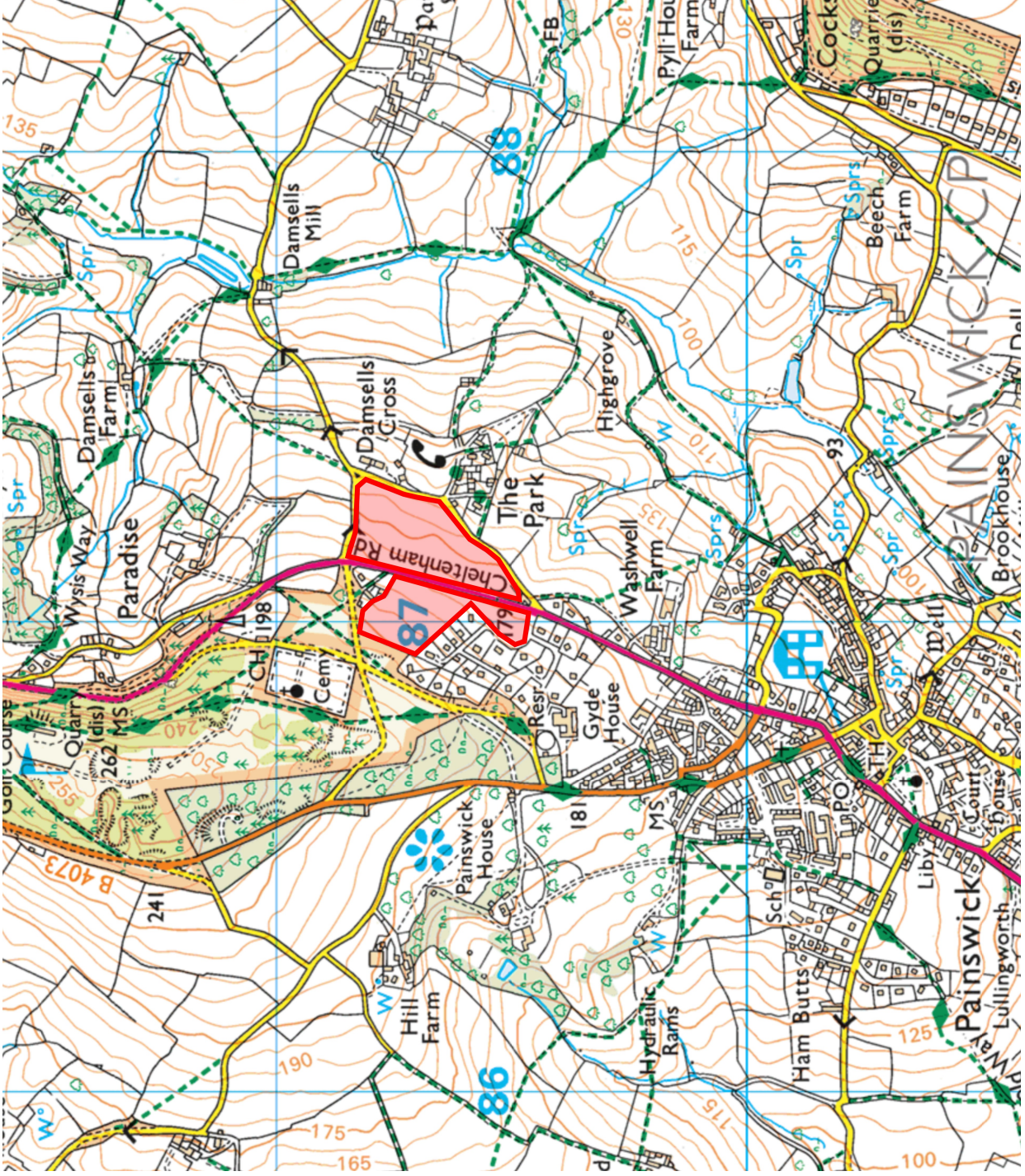
## **Conclusion and Modification**

36. CSL conclude that the Pre-Submission Local Plan requires modification to address the spatial development and strategy concerns for Painswick as part of the Cotswolds Cluster set out in this representation and with reference to the other, separate representations made by CSL to the Plan.
37. The allocation of CSL's land interest at Clattergrove, Painswick is necessary to make the Local Plan sound as it would positively and substantially address the extent of local housing needs in the Cotswolds Cluster and for Painswick. It would

also provide a sustainable and deliverable residential site alternative to the proposed allocation at PS41 – Washwell Fields which is not considered to be deliverable.

38. The Plan should be modified by the allocation of CSL's Site at Clattergrove, Painswick for 90 residential dwellings (market and affordable homes) with associated green space and supporting infrastructure.
39. The Plan's text concerning development at Painswick (Section 3.8) should be revised accordingly and a new plan drawing prepared to identify the extent of the Site and to describe its residential development allocation.

**Land West and East  
of A46, Cheltenham  
Road, Clattergrove,  
Painswick**



**Client: Charterhouse  
Strategic Land**

**Gross Site Area:  
7.49 Ha**