

## 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 Figure 3

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 **Figure 3** (Our Towns and Villages – Development Strategy for Tiers 1 - 4) as set out at pages 56 – 57 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.

### Status of Figure 3

5. It is not clear whether Figure 3 forms part of Policy CP3 (Settlement Hierarchy) or is merely supporting information to inform the policy. Neither the Policy CP3 wording or the supporting text at paragraph 2.9.14 – 2.9.19 cross-reference to Figure 3 and its status is therefore unclear.

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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

### Necessity

6. CSL also question whether Figure 3 is necessary in the Plan at all. The settlements named in Policy CP3 all have Settlement Development Limits (SDL) shown in the Plan's Policies Map accordingly - the definitive map base in accordance with the Town and Country (Local Planning) Regulations, 2012 at 9(1)(c) and (2) - and the Plan's other policies provide the objectives and directions for future growth and restraint as necessary.

### Local Service Centres Diagram in Figure 3

7. Turning to the details of Figure 3, Local Service Centres (Tier 2 in Policy CP3), the relevant diagram identifies that at least 30% affordable housing on all sites capable of providing four or more dwellings will be required in Minchinhampton, Painswick and Wotton-Under-Edge.
8. As set out in CSL's separate representation objecting to Policy CP9 (Affordable Housing), there is no clear evidence or compelling justification for a requirement to provide 30% affordable housing contributions on sites of four or more dwellings. Put simply, the available evidence base does not demonstrate why this is appropriate or how such a requirement would fundamentally address housing affordability and the availability of affordable housing stock, especially in situations such as for Painswick where there is only a single residential development site proposed for allocation in the Plan (PS41 – Washwell Fields).

### Conclusion

9. In summary, Figure 3 is not:
  - **Justified** – with respect to the requirement for 30% affordable housing contributions from sites of four or more dwellings in Minchinhampton, Painswick and Wotton-Under-Edge;
  - **Effective** – the status of Figure 3 is not clearly articulated as to whether it forms part of Policy CP3 or is part of the reasoned justification text. Its purpose is not therefore clear. Furthermore the need for Figure 3 to be included within the Local Plan at all is questioned given it appears to simply

summarise some of the other relevant Plan policies directing and restricting future growth.

## **Modification and Remedy**

10. The Plan should be modified by either:
  - a) deletion of Figure 3 in its entirety; or
  - b) modification of Policy CP3 and supporting text to clearly articulate the purpose and status of Figure 3.
  
11. If Figure 3 is to be retained at all, then the Tier 2 Local Service Centre diagram should be amended to remove reference to 30% affordable housing on sites of four or more dwellings unless and until there is clear evidence to support this requirement (in accordance with CSL's separate representation on Policy CP9).