

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 CP7

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 **CP7** (Inclusive Communities) as set out at page 225 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. CSL support the overall intention of Policy CP7 to ensure that new housing development contributes to the provision of sustainable and inclusive communities to encourage social cohesion. The Policy requires development to demonstrate how it will contribute to meeting identified long term needs in the communities the development relates to.
6. The long term needs of communities are not addressed or set out precisely and fully in the Plan or its evidence base. This is not consistent with the NPPF at

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

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.

7. The Settlement Role and Function Study Update 2018 (May 2019) does provide some background information about Painswick Settlement (albeit this was a snapshot at that time largely drawing from the 2011 Census and focused on the settlement of Painswick rather than a wider Parish or Cotswold Cluster area) of the demographic, retail, socio-economic and housing affordability characteristics for settlements but it does not, of itself, establish what the long term needs to be addressed are, nor does it assist in establishing the level, tenure or mix of housing (or other commercial development) that may be necessary to support long term community sustainability.
8. The Making Places – Shaping the Future part of the Local Plan (Section 3) provides generalised challenges and issues for the various Parish Clusters and for individual settlements but these are insufficiently precise to allow a clear understanding of what long term sustainability or community needs, including the need for particular types, mix or choice of housing or other services / facilities are required.
9. In short there is no clear set of identifiable long term needs for settlements and communities.
10. Plainly there is a substantial role for new housing (and other forms of development) to play in supporting the role and function and socio-economic sustainability of settlements as part of their wider Parish Cluster areas, but as written the Local Plan fails to demonstrate how the terms of Policy CP7 can really be met or performance monitored over the plan period.
11. The plan does not contain any properly articulated analysis and identification of the long term needs of each settlement in terms of its specific housing (quantum, type and mix), commercial and social / community facilities (what provision there is, what is missing and what requires increased support) for Policy CP7 to be effectively applied.

12. This is especially important in the context of paragraphs 4.5 and 4.6 states that financial contributions (presumably via S106 Planning Obligation) will be sought from major developments for the provision of Community Development Officers. Such contributions would need to be subject to viability testing of course (as paragraph 4.6 notes), but would also need to meet the relevant tests set out in NPPF 56 with reference to Regulation 122(2) of the *Community Infrastructure Levy Regulations, 2010*, namely: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

Conclusion

13. In summary, Policy CP7 is not:
- **Justified** – the policy, its supporting text and the Plan’s evidence base do not establish the economic, social / community or housing needs (in terms of tenure, size or mix / choice) of individual settlements, Parish Clusters or communities;
 - **Effective** – the policy does not clearly articulate the long term needs of communities that new housing development is expected to contribute to. In addition the supporting text indicates that contributions will be sought towards providing Community Development Officers but without adequate evidence and information linking the needs with development such requirements are unlikely to meet the relevant tests of NPPF paragraph 56 or the Community Infrastructure Levy Regulations, 2010.
 - **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

14. Policy CP7 requires an expanded and updated evidence base that sets out more detailed information about the long term needs of settlements and their

communities. The Policy and its supporting text should therefore make specific reference to where such information can be found to support the implementation of the policy and also the ability of the Council to secure appropriate planning obligation contributions in accordance with the relevant tests.