

Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

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="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 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.

NB: To be read in conjunction with Attachment A (a review of the Local Plan Viability Assessment Working Draft May 2021)

1.1 The Council is not proposing any changes to this policy beyond the deletion of the paragraph after bullet point 4 and the deletion of bullet points 'A' and 'B'. However, as stated by Pioneer Property Services Ltd ("PPS") on behalf of Robert Hitchins Ltd in response to the November 2019 Stroud Local Plan Review consultation (submitted in January 2020) this is a missed opportunity to re-visit the wording of this Policy within the

context of current National Planning Policy and given the concerns which were raised when the current adopted Stroud Local Plan was prepared and which remained unaddressed during that examination process.

- 1.2 The policy requirements within Core Policy CP7 are not clearly defined, and the wording is very vague in terms of what housing developments will be specifically required to provide. This is contrary to the NPPF paragraph 16.
- 1.3 What will be the measure of whether the requirements and factors listed are achieved by the applicant? How can proposals be developed with any certainty and assessment of costs be undertaken unless these matters are clearly defined by the Council? What is meant by 'health and wellbeing service co-ordination'?
- 1.4 How in practice will development proposals be expected to take into account the 'needs' of children, young people and families to accord with Policy CP7? How is the Council proposing to apply the findings of the Local Housing Needs Assessment September 2020 to justify / identify / quantify the requirements of the groups referred to in Policy CP7 thus enabling developers and decision takers to understand how the policy is to be applied? This policy appears to be simply repeating some of the same issues included in Policy DCP2.
- 1.5 It is unclear how the Council can viability assess the cumulative impact upon development of the cost of imposing the indistinctly described requirements within Policy CP7. Indeed the May 2021 Local Plan Viability Assessment Working Draft ("WDLPVA") confirms that 'the policy is general in nature' and the only aspect of the vague wording that is viability tested is the bullet points A and B (now deleted) on the assumption that these referred to the use of optional Building Regulations: Approved Document M Category 2 and 3 accessibility and adaptability and wheelchair standards (pages 142 to 143, WDLPVA).
- 1.6 Can the Council demonstrate how the obligations / conditions which they would seek to impose through Policy CP7 (and which are particularly unclear within the policy wording) will accord with the statutory CIL Regulation 122 tests / the tests in paragraph 55 and 56 of the NPPF?

(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.

As worded Core Policy 7 is unsound and should be deleted: it is unclear that it has been positively prepared, or that it is justified, effective or consistent with national policy. It is not possible to suggest alternative wording for the Council's consideration given the vagueness of what, specifically, the policy is seeking for developments to provide. The wording is more akin to that used to describe a strategic objective than a policy requirement and perhaps this is how it should be presented within the Stroud District Local Plan Review.

(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:

To provide further explanation as necessary of the concerns raised above.

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.

9. Signature:

A rectangular box with a black border. The left portion of the box is filled with a solid black rectangle, redacting the signature. The right portion of the box is empty.

Date:

20.07.2021