

Part B – Please use a separate sheet for each representation

Name or Organisation:

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 checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="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.

Policy CP3 of the Local Plan Review sets out a hierarchy for growth and development across the district. This hierarchy is based upon the settlements size and service provision and their functionality, relative to each other. PHSV support the approach that the primary, strategic levels of growth and development should occur in the Tier 1 main settlements, of which includes land controlled by PHSV to the West of Draycott, Cam, jointly promoted with Robert Hitchins Ltd.

Whilst PHSV support the emphasis of the delivery strategy that seeks to direct growth to those locations served by services and facilities, there is concern that the settlement hierarchy is being applied to determine the precise scale of development at such settlement, relative to their position within the hierarchy, particularly those settlements within Tier 3.

Such an approach carries with it the risk that it could constrain wider sustainable development opportunities, where such opportunities are required to maximise housing delivery over the plan period.

The classification of settlements provides a useful policy basis upon which the role and function of individual settlements/locations can be determined, relative to each other. However, the hierarchy does not in itself reflect the significant constraints imposed on a number of settlements within Stroud. Therefore, PHSV do not agree that the proposals for new development should be located in accordance with the District's settlement hierarchy. Instead PHSV consider the hierarchy should be used to classify settlements, but it should be clear that other factors should determine the exact level of development appropriate at each specific settlement within the hierarchy.

(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.

There should greater recognition within the Local Plan that the ability of individual settlements to accommodate growth in a sustainable manner is informed by site specific circumstances and those prevailing at individual settlements. The focus on the Settlement Hierarchy as determinative in the distribution and scale of development at individual settlements fails to acknowledge this.

(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:

Persimmon Homes Severn Valley (PHSV) is a national housebuilder and controls land identified within the Pre-Submission local Plan identified as proposed allocations, these being: 1) Land south of Wickwar Road, Kingswood (**PS38**), and 2) Cam North West (Land west of Draycott), working alongside Robert Hitchins Ltd (**PS24**). PHSV is therefore well placed to contribute to the Examination in terms of the effectiveness of the delivery strategy and the settlement hierarchy.

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:

Date:

21.07.21