

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

Section 1 What is a Local Plan for?

It is noted that paragraphs 1.2 and 1.3 state that the development strategy is articulated through a number of “Core Policies” and that the Local Plan also includes more detailed “Delivery Policies” for managing and directing development, as well as specific site allocations, area designations, protections and planning controls.

As currently presented it is not necessarily clear which policies are strategic and which policies are non-strategic. This may well be a simple presentation issue that can be rectified in the final version of the Plan.

Paragraph 17 of the NPPF (February 2019) states that the development plan must include **strategic policies** to address each local planning authority's priorities for the development and use of land in their area.

Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development.

Paragraph 20 of the NPPF sets out what strategic policies should cover in the Plan.

“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision¹ for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

Paragraph 21 then states that Plans should make it explicit which policies are strategic. Where a single plan is prepared, as in the case of Stroud, the non-strategic policies should be clearly distinguished from the strategic policies.

Paragraph 21 also states that strategic policies should be ***“limited to those necessary to address the strategic policies of the area (and any relevant cross boundary issues).”***

Paragraph 28 of the NPPF states that non-strategic policies ***“can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.”***

An index of policies would be helpful as only the Core Policies are referred to in the contents page.

The fact that the Council are preparing a complete review of the adopted Local Plan is welcomed.

¹ In line with the presumption in favour of sustainable development.

(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.

To distinguish which are strategic and which are non-strategic policies in accordance with the NPPF, an index of policies would be helpful as only the Core Policies are referred to in the contents page.

(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:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

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:

