

20th July 2021



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Local Plan Review
The Planning Strategy Team
Stroud District Council
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Dear Sirs

STROUD DISTRICT LOCAL PLAN REVIEW: REGULATION 19 PRE-SUBMISSION DRAFT LOCAL PLAN – RESPONSE ON BEHALF OF CHARTERHOUSE STRATEGIC LAND

We are instructed by and write on behalf of Charterhouse Strategic Land (CSL) with respect to the Regulation 19 Stroud District Local Plan Review: Pre-Submission Draft Local Plan for Publication (May 2021).

CSL welcome the opportunity to review and comment on the Pre-Submission Draft Local Plan. Objections are raised concerning:

- an imbalanced development strategy and distribution of housing growth that fails to plan positively or proactively to address the current and future issues and challenges faced by Painswick within the Cotswolds Cluster area;
- a failure to provide any evidence of local housing needs (including for market and affordable housing) at the sub-district level including in the Cotswolds Cluster area and Painswick;
- a failure to effectively evidence the service and facilities infrastructure needs of settlements to support thriving, sustainable centres such as Painswick;
- the allocation of an insufficient quantum of housing land and the failure to include any alternative housing allocations in Painswick, including the omission of CSL's land interest as a sustainable development location;
- the proposed allocation of site PS41 (Washwell Fields, Painswick) that is not deliverable;
- a lack of justification and clarity as to the reduced site size threshold for the contribution to affordable housing needs in the Cotswolds AONB and listed designated areas; and
- a fundamentally flawed Local Plan Sustainability Appraisal Report with respect to the assessment of reasonable alternatives for housing growth of individual settlements and Cluster areas, that is legally deficient.

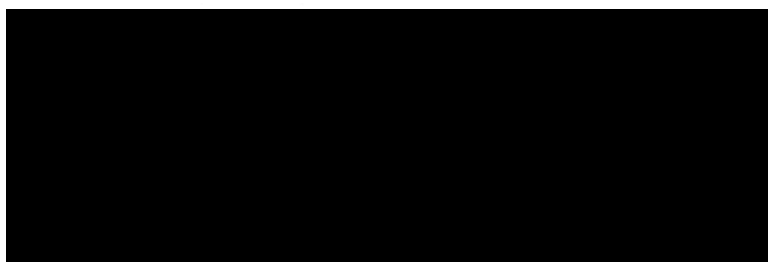


The following are enclosed:

- a) Completed Representation Response Form (Part A) for and on behalf of CSL;
- b) Completed Representation Response Forms (Part B) objecting to each of the following:
 - The Plan's Strategic Objectives, particularly SO1;
 - Policy CP2;
 - Policy CP3;
 - Policy CP7;
 - Policy CP8;
 - Policy CP9;
 - Policy DHC1;
 - Figure 3;
 - Section 3.8, the Cotswolds Cluster and Painswick;
 - Local Site Allocation PS41 Land at Washwell Fields, Painswick;
 - Omission of CSL's land interest as a residential land allocation at Clattergrove, Painswick;
and
 - The Plan's Sustainability Appraisal Report.

We would be grateful if you will confirm safe receipt of these representations.

Yours sincerely,



Director, Chilmark Consulting Ltd.

For and on behalf of Charterhouse Strategic Land

Encl.