

Job ref: P502/OM
Date: 14 January 2018

Grosvenor House
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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud GL5 4UB

BY POST AND EMAIL: [REDACTED]@stroud.gov.uk

Dear Sir/Madam,

**Stroud District Council Local Plan Review – Emerging Strategy Paper Consultation
Response on behalf of the Sylvia Pearce Children’s Settlement**

Thank you for providing Harris Lamb with the opportunity to participate in the Stroud District Local Plan Review and we welcome the opportunity to comment at this time. Harris Lamb are instructed to submit representations to the Emerging Strategy Paper consultation document by the Sylvia Pearce Children’s Settlement. The Sylvia Pearce Children’s Settlement (“SPCS”) own land at Upthorpe Farm to the east of Cam. SPCS are promoting part of their land (as per the attached plans) and confirm that it is available for development to meet the longer-term growth requirements of the settlement and wider district. In effect, we are promoting two parcels, the smaller of which could be developed as a single phase if the Council considers the larger parcel is not required this time round.

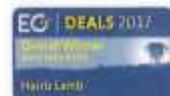
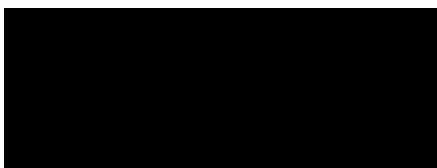
The land is greenfield and adjoins the urban area of Cam. The attached location plan shows the extent of the land within our client’s ownership which is being promoted for development. We believe that the smaller parcel, which adjoins the old person’s complex opposite Cam Hopton Church of England Primary School, would form a logical extension to the settlement boundary and therefore has development potential. The site has the potential to provide community facilities, such as a playing field or car parking for the local school, with an appropriate amount of housing.

Set out below is a response to the various questions raised in the Emerging Strategy Paper consultation document.

Question 1.0a & 1.0b

Issue 1: Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development:

We support in principle Issue 1 and what it seeks to achieve, as we contend that the delivery of sustainable new development is key to the creation of strong and stable communities. We agree that housing development should be located in the right place, by concentrating



development where there is good access to shops, services and facilities and consequently better levels of sustainability can be achieved. However, we wish to highlight that, in order to ensure that an appropriate range of sites that are suitable for residential development are allocated, this will necessitate the allocation of greenfield sites.

The settlement of Cam should be a preferred location for additional development and growth. Whilst Cam is classed as a village, it has a larger population than the neighbouring town of Dursley. The 2011 census indicated that there are approximately 8,162 residents in Cam, compared to 6,697 residents in Dursley. Cam also has a good range of shops and services, including a Tesco supermarket. As the largest and most sustainable village in Stroud District, Cam should be the focus for additional housing development.

Issue 2: Conserving and enhancing Stroud District's countryside and biodiversity including maximising the potential for a green infrastructure network across the District.

We have no objection to the principles set out in Issue 2, however, we wish to point out that brownfield land can often be proven to support as much, if not more biodiversity than a greenfield site.

Issue 3: Maximising the potential of brownfield and underused sites to contribute to housing supply

We have no objection to Issue 3, which seeks to maximise the potential of brownfield and underused sites in order to contribute towards the housing supply. We believe that the District should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plan and planning decisions, however, we contend that there will still be a need to use greenfield sites in order to have an appropriate mix of suitable sites.

We wish to see more small and medium sized sites allocated in order to meet the varying housing needs of the District, including care provision and self-build opportunities. We believe that it is important to maintain a mix of sites in order to properly assist the social and economic requirements of smaller service settlements such as Cam. It is our view that the Local Plan Review should seek to adopt a more equitable distribution of growth and take a more dispersed approach with a greater number of housing and employment sites being allocated at the larger villages such as Cam, as well as the District's larger towns.

Development should be focused in Cam as one of the District's most sustainable settlements. Additional development would help improve infrastructure provision and create a critical mass of development to support and deliver new shops, services and facilities. It would also result in a reduced requirement to deliver new homes in the District's less sustainable and more visually sensitive villages. There are Greenfield sites adjacent to the built up area of Cam, such as the southern sections of Uphorpe Farm, that could be developed without compromising the setting of the village.

Issue 4 – Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment.

We agree with the principle of Issue 4, however, the adverse impact and loss of existing biodiversity as a result of development can be mitigated through various measures and strategies that can be put in place in order to ensure the delivery of good quality development. Such strategies include ecological and environmental management schemes.

Issue 5 – Tackling the acute lack of affordable housing in the District

We agree with the objectives set out in relation to Issue 5. There is a clear need for affordable housing in the District, however, we believe that this will need to be addressed, in part, through the allocation of the correct number of sites. It is necessary to consider whether the over-reliance on larger sites, which may have extensive infrastructure requirement could actually affect the viability of some developments, and, act as a barrier to housing delivery.

Housing requirement

Question 2.3a & 2.3b

We note that the Preferred Strategy Paper proposes a housing requirement of at least 12,800 new homes. The Government has recently consulted on proposed changes to the NPPF and, specifically, the standard method and the use of the 2014 based household projections. We have undertaken a calculation using the 2014 based household projections for Stroud and have included a 5% buffer, which has established a figure of 13,541 dwellings. This figure is therefore, greater than that set out in the Emerging Strategy Paper and we would therefore recommend the Council plan accordingly in anticipation of the NPPF adopting the standard method of the 2014 based household projections.

We note that the Local Plan review is required to provide for at least 638 homes per year and that this is a significant increase from the requirement of 456 as set out in the current Local Plan. Robust and deliverable allocations are needed to ensure that the step-change in delivery proposed can be achieved. Therefore, this would need to comprise a variety of sites, including small and medium sites as advocated in paragraph 68 of the Framework.

It is our view that medium and small sites should play a greater role in housing delivery across the District and the Council should pro-actively support well-designed development on smaller and medium sized sites through both plan making and planning decisions. This will significantly increase the contribution of small and medium sized sites to meeting the District's housing needs, as well as diversifying the sources, location and type and mix of housing supply. Furthermore, this will also help to support/revive the role of small and medium sized developers in delivering new homes across the District. As well as providing support for those wishing to bring forward custom self-build and community-led housing, whereby these developments are integrated with existing neighbourhoods and support mixed and inclusive communities.

The definition of small and medium sites should be 10-60 units in order to meet the needs of small and medium sized housebuilders. Notwithstanding the fact that we do not see the need for there to be a limit to the contribution of small and medium sized sites, we do however contend that there should be a significant proportion allocated in order to ensure a greater contribution towards the Districts Housing Land Supply. It is therefore our view that the Local Plan Review should provide more clarity in regard to the role of small and medium sized sites in meeting the housing needs of the District.

Question 3.1a

We contend that the vision for 2040 as drafted in Section 3.1 does not, in our opinion appear to explain that this includes meeting the housing requirements for all sectors of the community.

Question 3.2a and 3.2b

We generally support Strategic Objective S01, however we reiterate our view that in order to meet these needs, it will be necessary to identify a range of small and medium sized sites.

Question 4.2 -The emerging growth strategy

We generally support a blend of Option 1 and Option 2. We agree that most development should be directed towards the main settlements, but this should not, however, be limited to just a few large sites. We contend that a wide variety of small, medium and large sites should be identified.

Despite the strategy set out in Chapter 4.2, which we agree with the approach that the amount of development at Stroud and Dursley is limited because of environmental constraints and, therefore, it is necessary that Cam takes a greater proportion of development in order to maintain sustainability and to provide a proportion of housing which can be released to meet the needs of Dursley. There are unconstrained sites in Cam which are suitable for this purpose, such as the parcel of land that form part of Uphorpe Farm to the east of Cam which we are promoting on behalf of the SPCS.

Accordingly, we do not support the Growth Strategy in terms of the distribution of sites but also the size and the scale of sites. It is our view that there is a need for more small and medium sized sites as previously stated. We believe that in order to ensure that the delivery of housing on new Growth Option sites, the plan should over-allocate sites in order to take account of the potential non-implementation of sites.

Question 4.3 – Settlement Hierarchy

It is our view that allocations should be confined to tiers 1, 2 and 3a and that no allocations should be made in any of the settlements beyond these three tiers. Mixed housing allocations could include market, affordable, car and self-build options.

Question 5 – Making Places

We refer now to the 2011 SHLAA entry for Uphorpe Farm, Cam. The SHLAA has incorrectly allocated all of the land in our clients control, not the more modest parcels which have been the subject of forward promotion through the Local Plan process and it is in fact our intention to present a much more modest proposal as shown in the attached plans (ref: P502-02 and P502-01B). Notwithstanding this point, the SHLAA exercise has demonstrated through the various assessments undertaken, that other than access, the site is considered deliverable and under single ownership. It has been determined that there are no principle constraints in terms of Flood Risk and AONB. The overall assessment confirms that the site is available, suitable and deliverability.

Question 6 – Background Studies

We support the inclusion of Cam as a tier 1 settlement, however it is our view that the quantum and range of sites allocated do not meet its role within the hierarchy.

Conclusion

In light of the above, we wish to promote the land at Uphorpe Farm on behalf of the Sylvia Pearce Children's Settlement. The site would form a logical extension to the settlement boundary and would be suitable for a mixed housing allocation, to include two acres for Care, two acres for market/affordable housing and one acre of self-build, of which would be subsidised by the market element in the first instance We are seeking approx. five acres of

net developable, therefore the allocation would need to allow for the provision of 40 percent green infrastructure. This would therefore result in the requirement of approximately 7.5 acres of allocation overall. The Upthorpe Farm site provides the opportunity to deliver housing in a sustainable location with supporting community infrastructure.

Alternatively, a larger area of land could be brought forward, again to provide a mixed tenure housing scheme with open space and parking for the school.

I trust you have found these representations of assistance. If you have any queries, or would like to discuss this matter further, please do not hesitate to contact me.

Yours sincerely

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Graduate Planner

[Redacted contact information]