

Re: Cam Neighbourhood Development Plan (NDP) – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended) and the Localism Act 2011

To fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the Council has commented on the emerging Cam NDP on a number of occasions.

We are committed to helping the qualifying body deliver a successful plan. In order to achieve that, we take this opportunity to offer constructive comments on issues that we consider have not yet been addressed in a satisfactory manner.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions.

Yours Faithfully

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Planning Strategy Manager

Stroud District Council

TABLE 1

NDP Section or Policy	Comment	Recommendation
Introduction, p6, final paragraph	This paragraph states that the NDP will have “the force of law” once it is made. Although the plan will form part of the development plan and be a material consideration in planning decisions, the contents of the Plan will not be legally binding.	Remove “giving it the force of law” or clarify its status and restructure sentence accordingly.
P17, first paragraph	For clarity, suggest replace the words “Spatial Strategy” with “Local Plan”.	Replace “Spatial Strategy” with “Local Plan”.
P18, Figure 5 Cam Plan Strategy Overview Map	The Map shows a criss-cross notation that does not appear on the key.	Add criss-cross hatching notation to key.
Policy CAMES2, para 1	<p>The 50m contour line identified in the landscape assessment of Local Plan strategic site SA3, and referred to in the supporting text of this policy, is specific to the landscape and visual characteristics of this strategic site and would not be adequate justification on its own for a parish wide policy on restricting all development above this line.</p> <p>The Cam Parish Landscape Sensitivity Assessment (2018) of land parcels does not appear to justify the use in this way of the 50m contour.</p> <p>Much of Cam already sits above the 50m contour line to the west which somewhat undermines the concept of having no development above it. This area is within the settlement development limit of Cam and therefore the policy would be in conflict with Core Policy CP2 and Delivery Policy HC1 of the Local Plan.</p> <p>The policy would not be in conflict if it applied only to land outside of settlement development limits, but would still need justifying with appropriate landscape evidence.</p>	Depending upon the availability of evidence to justify the restriction, either delete the second sentence of the first paragraph, or add “outside settlement development limits” after “development”.
Policy CAMES2, para 2	Scale may not be the only factor when determining	Replace this paragraph with:

	whether a development could have an impact on the AONB and its setting. It is also difficult to interpret how development could enhance a protected landscape.	“Development which has an adverse impact on the Cotswold AONB and its setting will not be supported.”
Policy CAM ES3	The policy does not appear to offer any protection for locally valued views as the requirement is only for proposals to assess the impact and show how it would alter it. If the intention is to protect locally valued views, consider additional text.	Replace “and demonstrate how proposals would alter it” with “and demonstrate how proposals would enhance or not adversely affect it/them.”
P28, view number 7	Rather than show one locally valued view, it would be more helpful if a composite map showing all 8 views could be included here.	Remove View number 7 and add a composite series of photos showing all locally valued views.
Policy CAM CD1	This policy could be made clearer to aid the decision making process, and also to act as the main policy hook to the Cam Design Code.	Replace this policy with: Development should demonstrate how it reinforces local distinctiveness and how it has been informed by ,and conforms with the design principles of, the Cam Design Code (Annex 3)
P32, final paragraph	Textual error.	Remove “Cam” from before the words “Design Codes”.
Policy CAM CD2	Bullet point ii could be clarified to ensure consistency with Local Plan Policy ES8.	Add “unacceptable” before “adverse impacts”
Policy CAM CD3	A number of decision makers will use the NDP and so the reference to Cam Parish should be removed. The first paragraph could also be made clearer.	Replace first paragraph with: “Developers are strongly encouraged to be sustainable in the use of resources and to be innovative in the use of high energy efficiency standards. This includes...”
Policy CAM CD4	The policy wording could be simplified to aid the decision making process. The first paragraph simply replicates the NPPF.	Change policy wording to: ““Developers are strongly encouraged to follow the procedures set out in the Cam Pre-application Engagement Protocol (appendix 2) in order to demonstrate early, proactive and effective engagement with the community.”