

Neighbourhood Planning Officer
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Our Ref: 08-21 JD
Your Ref:

17 January 2020

By email only:
ndp.consultation@stroud.gov.uk

RE: CONSULTATION – CAM NEIGHBOURHOOD PLAN – SUBMISSION VERSION – JANUARY 2020

INTRODUCTION

These representations are submitted on behalf of Persimmon Homes Severn Valley (PHSV).

Having worked closely with other neighbourhood groups to ensure that Neighbourhood Plans meet the basic conditions and are therefore found to be sound through examination, PHSV were pleased to engage positively with the Parish Council to date to discuss the practical implications of such policies within and outside of the formal emerging planning policy consultation process.

PHSV are supportive of neighbourhood planning, recognising that it enables local communities to direct growth and ensure that development seeks to reflect the particular special characteristics of their area. Neighbourhood Planning can be a daunting task for local communities who are understandably not commonly well versed in the complexities of the planning system as well as the web of regulations and law which set out the parameters within which policy must be drafted and the process through which it should emerge.

With this in mind, PHSV hope to have provided some constructive feedback on the Cam Neighbourhood Plan and the policies therein to not only ensure that the Plan meets the basic conditions which will allow it to pass examination, but also to ensure that the requirements do not impact negatively on the future growth of Cam.

We note the changes made to the Plan following our recommendations as part of the previous consultation and welcome those amendments made.

Having reviewed the submission version, we now offer the following comments and observations and believe these amendments are required in order for the Plan to pass the basic conditions and enable it to proceed to referendum.

NEIGHBOURHOOD DEVELOPMENT PLAN

Policy CAMES2 – Parish Landscape Character

Whilst we agree with the intention of Policy CAMES2 which seeks to protect landscape views, we believe that the wording of Policy CAMES2 is too simplistic and its practical application will result in stunting Cam's growth in terms of all forms of development proposed in future, whether this is for housing, commercial or community uses. For instance, any development of community buildings on the jubilee fields open space would likely be above the 50m contour and through the application of this policy would be unacceptable. There will be many instances where development may end up breaching the 50m contour line but where the context of that particular site means that the visual impact is limited. There may also be cases where much needed development may breach the 50m contour line but whereby technical evidence is able to demonstrate that mitigation can be put in place which could mitigate those impacts. The policy wording needs to be amended to ensure development in these types of scenarios is not prevented. We would suggest the following amendment (in red):

“Development proposals should demonstrate how local landscape characteristics have informed a sensitive design response and how design principles contained within the Cam Design Code have been used to inform the design. A key local landscape characteristic is topography and in response to that, **applications which would breach the 50m contour line development should be limited to below the 50 meter contour line** (as shown on Figure 8), **should be supported by a landscape and visual impact assessment which demonstrates that they can proceed without an unacceptable visual impact on the landscape**”

CAM DESIGN CODE

Cam Code 3f: Tree Replacement, Planting & Maintenance

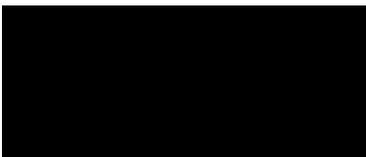
Whilst following our comments on the previous consultation we applaud the inclusion of wording which recognises that the assessment of the number of replacement trees required should include consideration of the quality of those proposed replacements in order to provide flexibility, it is our view that the new inclusion of the Bristol City Council tree replacement standard is even more onerous and

inflexible than the previous wording in the Design Code. Bristol City Council's administrative boundary is fully encompassed within the urban area of Bristol and as such, the areas characteristics necessitate that improving the green credentials of development sites is a high priority. As a result, the Bristol City Council tree replacement standard sets a very high bar in order to maximise the provision of new trees across the city. It is commonplace within new developments within Bristol that this standard is not able to be met on schemes. The context within Cam is very different with the area having a far more rural to urban transitional characteristic and where, whilst the provision of trees on new developments is important, it is not a necessity to maximise tree coverage as it is in Bristol. What is more important in Cam, as is demonstrated in the Design Code, is the positioning of trees within developments to ensure they are focal features and lead the design. The reality is that the practical application of the Bristol City Council tree replacement standard in Cam will mean that the focus will move to providing quality, rather than ensuring quality trees are located in the most appropriate places to ensure that developments give those who move through those spaces the impression that trees are the focal point. Reference to the Bristol City Council tree replacement standard should be removed and wording should replace it which seeks that as a minimum, an equal number of trees should be planted for those that are lost but that trees should form a focal part of the landscaping design of any scheme.

These comments are intended to be constructive and PHSV would be pleased to enter into further discussions on these comments as well as the practical implications of the policies, including through a public hearing as part of the examination. We consider that the proposed amendments we have set out will ensure that the Plan meets basic conditions (a) and (d) and without these amendments the Plan can not pass examination and proceed to referendum.

We would appreciate being kept informed of any future consultations on the Neighbourhood Plan and being invited to any public hearings as part of its examination.

Yours sincerely,



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