

Cam Parish Neighbourhood Development Plan 2019- 2031

Submission Version

A Report to Stroud District Council on the Examination of the Cam
Parish Neighbourhood Development Plan

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Executive Summary

My examination has concluded that the Cam Neighbourhood Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications, which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- Remove the requirements that development must enhance the AONB.
- Restrict the limitations on development above the 50m contour to the areas outside the settlement boundary.
- Include a presumption that schemes which have a significant adverse impact on an identified view that cannot be satisfactorily mitigated will not be supported.
- Encourage schemes to have regard to the tree replacement advice set out in the Cam Design Code.
- Refine the criteria to be more specific to the types of community facility that the plan seeks to protect.
- Remove Street Farm Field from the list of Local Green Spaces.
- Remove the Safeguarding Employment Sites policy as it is not in accordance with the strategic employment policies in the Stroud Local Plan.

The referendum area does not need to be extended beyond the plan area.

Introduction

1. Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the adopted Stroud District Local Plan. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been led by Cam Parish Council. A Steering Group was appointed to undertake the plan preparation made up of both parish councillors and local volunteers. Cam Parish Council is a “qualifying body” under the Neighbourhood Planning legislation.
3. This report is the outcome of my examination of the Submission Version of the Cam Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the plan then receives the support of over 50% of those voting at the referendum, the Plan will be “made” by Stroud District Council.

The Examiner’s Role

4. I was appointed by Stroud District Council in December 2019, with the agreement of Cam Parish Council, to conduct this examination.
5. In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 41 years’ experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant and director of John Slater Planning Ltd. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both Stroud District Council and Cam Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.
6. Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:
 - That the plan should proceed to referendum on the basis that it meets all the legal requirements.
 - That the plan should proceed to referendum if modified.
 - That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

7. Furthermore, if I am to conclude that the Plan should proceed to referendum, I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the Cam Neighbourhood Plan area.
8. In examining the Plan, the Independent Examiner is expected to address the following questions
 - Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
 - Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 - namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
 - Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body?
9. I am able to confirm that the Plan does relate only to the development and use of land, covering the area designated by Stroud District Council, for the Cam Neighbourhood Plan, on 4th February 2014, if it is modified in accordance with my recommendations.
10. I can also confirm that it does specify the period over which the plan has effect namely the period from 2019 up to 2031 which coincides with the end date of the Stroud Local Plan.
11. I can confirm that the plan does not cover any “excluded development”.
12. There are no other neighbourhood plans covering the area covered by the neighbourhood area designation.
13. Cam Parish Council, as a parish council, is a qualifying body under the terms of the legislation.

The Examination Process

14. The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.
15. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

16. I am satisfied that I am in a position to properly examine the plan without the need for a hearing.
17. I carried out an unaccompanied visit to Cam and the surrounding countryside on Tuesday 4th February 2020. I explored on foot the village centre, and I walked through and across a number of the disputed Local Green Spaces and saw the viewpoints. I toured around the parish and appreciated the different character areas and I noted the employment areas, and the new residential development that is now underway at the north-east corner of the plan area and the parking situation at Cam and Dursley Railway Station.

The Consultation Process

18. Since setting up the steering group in 2014 the Parish Council used a variety of methods of consulting and involving the public with the neighbourhood plan including using Facebook and the parish website, holding drop-in events such as at Tesco's or in the parish council offices, maintaining a presence at local events and conducting individual questionnaires and consultations.
19. The questionnaire was circulated to every household in Cam, which generated a 14.7% response. Separately a transport survey was conducted jointly with Dursley Town Council and also a business survey was conducted, which generated 74 responses. Towards the end of the plan making process there was a separate consultation on the issue of local green space.
20. All this activity culminated in the preparation of the Pre-Submission version of the neighbourhood plan, which was the subject of the six-week public consultation, known as the Regulation 14 consultation, which ran from 17th June 2019 to 29th July 2019. That consultation generated a total of 330 comments from 141 respondees ranging from statutory consultees, landowners and members of the public.
21. The consultation responses and the changes proposed to the plan by the Steering Group are fully documented in the table entitled Regulation 14 Comments and Responses.
22. I have been very satisfied with the openness of the process which has allowed the residents and interested parties, to shape their neighbourhood plan.

Regulation 16 Consultation

23. I have had regard, in carrying out this examination, to all the comments made during the period of final consultation which took place over a 7-week period, between 29th November 2019 and 17th January 2020. This consultation was organised by Stroud District Council, prior to the plan being passed to me for its examination. That stage is known as the Regulation 16 Consultation.
24. In total, 13 responses were received from Natural England, Gloucestershire County Council, Stroud District Council, Highways England, Historic England, National Grid, Severn Trent, Environment Agency, Sports England, Slimbridge

Parish Council, Persimmon Homes Severn Valley, Pegasus Group on behalf of Robert Hitchins Ltd and LPC on behalf of [REDACTED] and [REDACTED].

25. I have carefully read all the correspondence and I will refer to the representations where it is relevant to my considerations and conclusions in respect of specific policies or the plan as a whole.

The Basic Conditions

26. The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.

27. The five questions, which seek to establish that the Neighbourhood Plan meets the basic conditions test, are: -

- Is it appropriate to make the Plan having regard to the national policies and advice contained in the guidance issued by the Secretary of State?
- Will the making of the Plan contribute to the achievement of sustainable development?
- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
- Will the making of the Plan breach or be otherwise incompatible with EU obligations or human rights legislation?
- Will the making of the Plan breach the requirements of Regulation 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017?

Compliance with the Development Plan

28. To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Stroud District Local Plan, adopted in November 2015.

29. Cam is a settlement that alongside the neighbouring town of Dursley, is to be the focus for development in the Southern half of the district. North East Cam is identified in Policy CP2 as one of the district’s strategic sites, to accommodate 450 dwellings and 12 Ha of employment land.

30. Policy CP2 also includes a presumption that housing development will take place within settlement development limits for the areas outside the strategic sites.

31. Policy CP3 sets the settlement hierarchy and that identifies Cam and Dursley together as a first-tier Accessible Local Service Centre, to be the primary focus for growth and development, to safeguard and enhance their strategic roles as employment and service centres.

32. Policy SA3 is the strategic allocation policy for the North East of Cam growth area, a sustainable urban extension, which establishes the level of development and the design parameters including a new linear park along the river corridor and extensions to the cycle route along the line of the disused railway which is also specifically identified in Delivery Policy E113.
33. In terms of the retail hierarchy, Cam is identified as a district centre where the aim is to maintain and enhance its vitality and viability
34. I am satisfied that the policies in the neighbourhood plan are in general conformity with the strategic policies in the adopted Local Plan.

Compliance with European and Human Rights Legislation

35. Stroud District Council issued a Screening Opinion, dated 8th November 2019 which concluded, having consulted with the three statutory consultees, that a full strategic environmental assessment, as required by EU Directive 2001/42/EC which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”, would not be required.
36. The District Council, as competent authority, issued a screening under the Habitat Regulations, in the same letter. This agreed with the assessment of Natural England that the plan is unlikely to have any significant adverse effects on the nearest European Protected sites, which are Rodborough Common SAC, the Cotswold Beechwoods SAC and the Severn Estuary SPA.
37. I am satisfied that the basic conditions regarding compliance with European legislation, including the newly introduced basic condition regarding compliance with the Habitat Regulations, are met. I am also content that the plan has no conflict with the Human Rights Act.

The Neighbourhood Plan: An Overview

38. I must congratulate the Steering Group on the quality of this neighbourhood plan. It is a comprehensive, well written and presented plan that builds upon a clear vision for Cam and has a clear set of objectives which sets the context for the policies. It proposes a number of specific planning policies, which are backed up by proportionate evidence. The maps are clear and are a useful basis for decision making.
39. These neighbourhood plan policies add a local dimension which will sit comfortably alongside the Stroud Local Plan. They are distinctive policies which reflects the unique characteristics of the parish, and especially its landscape setting. The authors of the plan accept that the parish is going to change through the strategic allocations in the north-east corner of the village and have taken a positive approach which seeks to shape the new development so that it meets the needs and aspirations of the local community.

40. The design policies are particularly based on a good understanding of the existing character of the parish and aims at promoting a strong locally distinctive design. I consider that the Cam Design Code is a helpful annex to the plan.
41. I am satisfied that the plan will deliver sustainable development, placing great weight on securing good locally appropriate design reflecting the special landscape setting, at the same time as protecting the natural green infrastructure and the pedestrian routes which criss-cross the area and into the countryside beyond. It also thoroughly highlights the community facilities and green spaces that are valued by the local population, which it seeks to protect. The plan is generally one that positively encourages sustainable construction but does so by offering support rather than making it a pre-requisite.
42. My recommendations have concentrated on the wording of the actual policies against which planning applications will be considered. It is beyond my remit as examiner, to comprehensively recommend all editorial changes to the supporting text. These changes are likely as a result of my recommendations, so that the plan will still read as a coherent planning document. Some of these are highlighted in the Regulation 16 Comments.
43. Following the publication of this report, I would urge the Parish Council and Stroud planners to work closely together to incorporate the appropriate changes which will ensure that the text of the Referendum Version of the neighbourhood plan matches the policy, once amended in line with my recommendations.

The Neighbourhood Development Plan Policies

Policy CAMES1 – Green Infrastructure and Biodiversity

44. I commend the plan for mapping the network of green infrastructure and for taking a strategic approach to maintaining and enhancing this network. This is entirely in line with the Secretary of State's policy as set out in paragraph 171 and 174 of the NPPF. I consider that the policy meets the basic conditions.

Policy CAMES 2 - Parish Landscape Character

45. The plan draws upon a strong analysis of how the settlement sits in its landscape context. This is particularly important in view of the topography of the area with higher land to the south, east and west of the parish and the flat landscape of the Severn Valley to the north.
46. The wording of the policy implies that **all** development proposals would be expected to demonstrate how the design reflects the landscape context. I do not consider that this is a reasonable requirement, if applied to every development proposal that comes forward in the parish. For example, the term development proposal would include building changes of use, which would have no landscape impact and in my opinion, it is unlikely that domestic extensions within the settlement area will affect Cam's landscape character. I will therefore be recommending the introduction of a caveat that the policy should apply only where it is appropriate, having regard to the scale of the proposal and its potential to

impact on the wider landscape. The requirement is not necessarily to prevent development but it does ensure that its landscape impact informs the design, where the scale or location warrants it.

47. I do have a concern regarding the policy requirements which imposes a limitation on development to below the 50m contour. That was a subject that has been raised in some Regulation 16 representations. There will be sites that are above 50m contour, which fall within the settlement boundary. I consider that this stipulation will not be in accordance with Policy CP2 of the adopted Stroud Local Plan, which I considered to be one of its strategic policies, which supports development within the settlement boundary. That, in itself, leads me to the conclusion that that aspect of the policy, does not meet the basic conditions. I will therefore be following the District Council's suggestions that the policy should only apply outside of the built-up area, and I note that the Parish Council, in its response to the Regulation 16 representations, accepts that suggestion.
48. The second paragraph deals with the impact of development on the Area of Outstanding Natural Beauty (AONB). I recognise that the sensitivity of the location of this parish merits such a policy. However, the requirements of this part of the policy not only requires that the scheme should not detract from the visual qualities of the AONB but must also *enhance* them. I note that paragraph 172 of the Framework states "Great weight should be given to conserving and *enhancing* landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty". I do not consider that this wording actually places an obligation on every planning application to have to demonstrate that it will "enhance" the landscape and scenic beauty of the Cotswolds AONB, but rather that the development should not detract from the landscape quality. I will recommend that the requirement to "enhance" be removed from the policy.

Recommendations

In the first sentence, after "should" insert "where appropriate, having regard to the scale of the proposal and its potential to impact on the wider landscape,"

In the second sentence of the first paragraph after "development" insert "outside of development limits".

In the final paragraph, delete "enhances and".

Policy CAMES3 - Valued Views

49. This policy ensures that the impact of development on a number of specific views is to be taken into account through the planning process. I am satisfied that they would all qualify as valued viewpoints. However, the policy as drafted does not assist the decision maker in the determination of the planning application, as to how the assessment required, would be used. I consider that the policy will only be able to achieve its objective, where the development will maintain the essential characteristics of these important views. I will therefore recommend the insertion of a requirement that where proposals significantly adversely impact on the views which cannot be mitigated, will not be supported.

50. I have no comments to make on the second paragraph which encourages the creation of new views and apparent panoramas from public spaces created within new developments.
51. Whilst this is not a formal recommendation I also suggest that it would be helpful to users of the document, if thumbnail photographs of all the views could be inserted into the plan, not just View Point 7.

Recommendation

Add at the end of the first paragraph “development proposals which have a significant adverse impact on any of these views, which cannot be mitigated, will not be supported.”

Policy CAMCD1 - Locally Distinctive Design

52. This policy states that **all** development proposals should be submitted with an appropriate design analysis and statement. A neighbourhood plan cannot set down requirements as to what documents and information should be submitted with a planning application. Those requirements are set by the District Council in its Local Validation Checklists. Similarly, the Town and Country Planning (Development Management Procedure) Order 2015 sets out that a design and access statement should only be required on major schemes i.e. over 10 units or on development in conservation areas or World Heritage Sites. I will be recommending that the term “should” be replaced with “are encouraged”.
53. I support the aspirations of the Parish Council in seeking to reinforce the locally distinctive character of Cam as set down in the second paragraph, but the policy itself needs re-drafting as reference to compliance with other policies is unnecessary as the decision maker is required to consider any proposal against all relevant policies in the development plan. I will be recommending the deletion of that phrase, in the interests of being concise.

Recommendations

In the first paragraph substitute “are encouraged to” for “should”.

In the second paragraph, delete “Subject to development being found to be acceptable when judged against other policies in the Development Plan”.

Policy CAMCD2 – Cam’s Trees, Woodlands and Hedgerows

54. I have no comments to make in respect of the policy which is well drafted. The identification of key trees is helpful; however, it should be appreciated that a neighbourhood plan in itself cannot protect the tree from being felled, unless it is protected by a Tree Preservation Order or is within a conservation area.
55. In terms of the number and species of replacement trees which is set out in the Cam Design Guide and is referred to in the penultimate paragraph, I have paid particular attention to the representations that have argued that importing the same specifications as used by Bristol City Council is not appropriate, due to the different circumstances of a small community, set in the Gloucestershire countryside with those relevant to an almost entirely urban area.

56. On the other hand, I consider that it is perfectly acceptable for the community, in the spirit of neighbourhood planning, to place a high priority on securing enhanced replacement tree planting.
57. In my experience, in arriving at good landscaping schemes, much depends on the characteristics of the site, the nature of the development and the expectations regarding the replacement trees. For example, is it better to have one standard sized tree planted or three whips? Equally, the nature of the development will be very relevant. On a major residential greenfield development, it is not always appropriate to replace the trees in the position where they were felled, but rather greater benefit could derive perhaps by more structural planting as it is being proposed in the case of the new residential development taking place in the north-east of the plan area.
58. There needs to be a balance struck between reflecting the community's desire to increase tree cover for the obvious reasons of responding to climate change, place making and achieving local distinctiveness, and the need to avoid reliance on a too rigid/formulaic approach so as to allow flexibility at the development management stage. I will be proposing that the policy be changed from "be selected in line with advice" to "have regard" to the advice set out in the Cam Design Code.
59. I concur with the District Council's comments that the threshold for adverse impacts on trees should be "unacceptable" adverse impacts.

Recommendations

***In ii) insert "unacceptable" before "adverse"
In the penultimate paragraph, replace "be selected in line with" with "have regard to the"***

Policy CAMCD3 - Sustainably Designed Homes and Places in Cam

60. This is a policy that offers "*encouragement*" and "*support*" for projects to incorporate sustainable design features. It is not as a policy setting out a *requirement* or an *expectation* that new homes must incorporate these features. That would be contrary to the Secretary of State's policy set out in a Written Statement to the House of Commons dated 25th March 2015. It specifically states that neighbourhood plans cannot impose such technical standards and that those matters are left to, either being set in an adopted local plan or are covered by the Building Regulations. A planning application could not be refused if it did not comply with the expectations set by this policy.
61. I will therefore recommend that the intention of the policy be retained, but I will again be recommending as I did in respect of Policy CAMCD1, the removal of the caveat in the policy relating to having compliance with other policies, as this is unnecessary.

Recommendation

At the start of the second sentence, delete "Subject to development being found to be acceptable when judged against other policies in the Development Plan."

Policy CAMCD4 - Pre-Application Community Engagement

62. It is clear that the Parish Council recognises the value and encourages pre-application engagement. That is in line with good practice and the Secretary of State advice. I note that the wording reflects paragraph 128 of the Framework. It is important not to misinterpret the intention of the Secretary of State's advice in that paragraph in that acceptable planning applications could not be refused on the basis that the applicant has chosen not to enter pre-application discussions.

Policy CAMM C1 - Improving and Enhancing Connections for Cyclists and Pedestrians

63. I have no comments to make on this positively worded policy.

Policy CAMCP1 - Retention and Community Facilities

64. I have concerns regarding the requirements that all major housing development should include in the submission of a statement of the existing community facilities within 800m and to address the need for facilities generated by the development. The plan does not define what it classes as *major housing development*. Major development is defined in the Town and Country Planning (Development Management Procedures) Order as schemes of 10 units or more.
65. I do not consider that a threshold of 10 should be the trigger for such an assessment and I suspect the policy is primarily aimed at future greenfield site residential development, which is likely to come forward through the local plan making process. An allocation policy should establish specific on-site community requirements such as play areas and community buildings.
66. Furthermore, as Stroud District Council has adopted the Community Infrastructure Levy (CIL), it can use CIL to fund what it describes as *social infrastructure* in its Regulation 123 list. It is also open to the parish council to use its proportion of CIL receipts to also enhance community facilities arising from an increased population resulting from new development taking place in Cam parish. I consider that it is more sensible basis to fund enhancements generated by incremental increases in the number of residents in the parish, beyond those which the District Council's standards require to be provided on site. I will therefore be proposing that the first paragraph of the policy be omitted.
67. The next part of the policy is similarly problematical. The policy seeks to protect what is a very wide range of "community facilities" which it has identified, ranging from a railway station through to the uses of land such as allotments, playing fields play areas and tennis courts and it then going beyond to include buildings such as churches, village halls and schools.
68. I consider that a neighbourhood plan policy which requires a train station (which would not fall within the community facilities definition set in the Local Plan) to be retained would be unworkable, as it merely requires a decision of the train operator/rail authority to no longer to decide that trains will no longer stop at Cam

and Dursley and the use of the facility will be lost. I will recommend that the railway station is removed from the list of community facilities.

69. I appreciate the wish to retain churches, but I am not sure that using the criteria of alternative places of worship within 800 m would offer an acceptable replacement if for example, it will to be a church of a different denomination. Furthermore, it must be appreciated that some existing community facilities within buildings, can also be lost through changes of use, if the new use falls within the same Use Class D1, without requiring planning permission. That means that buildings used a clinics and health service centres can also be used as a day nursery, school, library, place of worship etc. whilst they may retain the community use they may fail the test of being adequate similar facilities which cater for the needs of the local population.
70. I accept that this policy has a role in retaining land and buildings in a community use, but it is not always realistic to expect a similar facility to be available within 800m in every case. For example, if an allotment was lost there may be alternative facilities within 800m, but unless there are vacant plots available, the needs of the population would not be met but the proposal would comply with policy.
71. In addition, I find that the criteria used is too prescriptive, in that it requires audited financial and marketing evidence to be provided and I would question how such a requirement would operate in terms of justifying the loss of a skate park or a playground.
72. I agree that there is a case for planning application which proposes an alternative use of a community building or the redevelopment of a community site which is included on the list, should be expected to properly assess whether the existing use could be reasonably able to continue or that is closure is justified e.g. looking at usage levels in terms of the allotment holders, or whether a retail shop retains a post office contract, in the cases where planning permission is actually required. As well as the case for justifying the loss on viability grounds, the additional test of alternative facilities within 800m is difficult to justify in every case. Alternative play facilities in the locality could fit that description, but patently it would not apply to the railway station and the 800m rule may not perhaps be appropriate for relocation of the offices of the parish council so long as it remains located within the parish.
73. I will be recommending an alternative form of wording that will allow a more nuanced approach reflecting the types of uses which are identified in Figure 14 but which seeks to respect the objective of the policy.

Recommendations

Delete the first paragraph

Replace the second paragraph and 2 subsections and the list of community facilities with “Development which involves the loss of the following community facilities will not be supported unless it meets the relevant criteria:

- **2 Cam Surgery – unless alternative equivalent primary health provision is made elsewhere in the parish.**

- **3 Cam Dental Surgery- unless alternative equivalent dental facilities are available elsewhere in the parish.**
- **4 Cam Post Office – unless alternative equivalent post office services are provided elsewhere in the parish.**
- **The existing play/ recreation facilities are no longer fit for purpose and alternative play / recreation areas are available to meet the needs of the local population facilities in the immediate locality.**
 - **5 Woodfield Play Area**
 - **6 Tilsdown Square**
 - **7 Cam Sports ground**
 - **8 Norman Hill**
 - **9 Cam Skate Park**
 - **10 Jubilee Field**
 - **11 Cam Green Play Area**
 - **12 Draycott Play Area**
 - **13 Holywell Orchard**
 - **14 Box Road Play Area**
- **Unless equivalent replacement sports facilities are provided elsewhere in the parish.**
 - **15 Cam Sports Club**
 - **16 Cam Mills Bowling Club**
 - **17 Tennis Courts**
- **Unless it is demonstrated that there is insufficient demand for a particular allotment to continue to be viable and that there are alternative allotments within the parish with spare capacity to accommodate those plot holders that are being displaced.**
 - **18 Ashmead Allotments 1**
 - **19 Ashmead allotments 2**
 - **20 West End Allotments**
 - **21 Woodfield Allotments**
 - **22 Upthorpe Allotments**
 - **23 Middle Mill Allotments**
- **Unless it is demonstrated that the use as a place of worship is no longer viable as a congregation and that it is demonstrated through marketing of the building that there are no other community uses that could use the building**
 - **24 Quarry Chapel URC Church**
 - **St Bartholomew’s Church**
 - **26 One Church Cam**
 - **27 Cam Methodist Church**
 - **28 St George’s Church**
 - **29 3C Community Church**

- ***Unless it can be shown that the continued community centre use of the building is no longer viable and there is no likelihood of alternative community uses occupying the building***
 - ***30 Arthur S Winterbotham Memorial Hall***
 - ***31 Cam Parish Council Offices***
 - ***32 GL11 Community Hub***
 - ***33 Woodfield Community Centre***
 - ***34 Ashmead Village Hall***
- ***Unless alternative equivalent replacement school places are provided within the catchment area.***
 - ***35 Cam Woodfield Junior***
 - ***36 Cam Everlands Primary***
 - ***37 Cam Hopton CofE***
 - ***38 Peak Academy***

Policy CAMCF2 - Local Green Space Designation

74. I have visited all the proposed LGS designations and I walked around two of the disputed LGS sites, namely Street Farm Field (LGS8) and Riverside, land at Everlands (LCS 10). I have also had regard to the supporting document Local Green Space Report 2019.
75. I would firstly confirm that I am entirely satisfied that the remaining eight sites meet the criteria set in paragraphs 100 of the NPPF.
76. I have however come to the view that Street Farm Field does not justify the conferring of the highest level of protection of this green space. This land is not in public ownership, but that is not a requirement for LGS status. I noted that the northern part of the field had been fenced off in the past. Whilst I clearly was not seeing the land at its best, I found the land somewhat unkempt in appearance and my impression was the fact that it is more likely that this is an area which people would pass through, rather than being an area that is used for recreation or leisure. I am not satisfied that the case has been made that its status is justified because of its historical significance.
77. The public's use of the footpath's that cross the site, is protected through right-of-way legislation. I did not perceive that the site possesses a particular sense of tranquillity and I would not describe the site as being an island of calm which would attract people from further afield, on the basis of its tranquillity. The fact that wildlife is seen in the space would again not justify LGS status, as they would equally be seen on other areas within the settlement.
78. I have had regard to the Inspectors description of this site which was made in the context of a planning appeal in 2016, where he described it as "a pleasant green gap and transition between town and country" but I am not persuaded that it justifies protection of being demonstrably special to the local community.
79. I am sure that my recommendation will come as a disappointment to the residents who live in the vicinity of the site, but the site lies outside of the settlement boundary and will fall above the 50m contour line where there is a presumption against development under the terms of Policy CMES2. The District Council has

concluded in its SALA 2018 Update Report that the land is unsuitable for development due to its likely high landscape impact. I am also conscious of the Inspector's description in respect of the 2016 appeal.

80. My interpretation of the Framework's intention for LGS status is that it should be demonstrably special to the wider community, rather than just to the persons whose properties surround the site. I am not convinced that Street Farm Field meets that high threshold.
81. I was also very conscious on my visit to Cam that there were Regulation 16 representations made in respect of the land at Everlands, which runs alongside the River Cam. I do agree that this woodland area will have a particular significance, in terms of the wider community, which Street Farm Field does not. Whilst there is a short section of public footpath that crosses the site, there is clearly evidence of much greater public usage of this woodland area. I followed a number of clearly defined pedestrian routes through the undergrowth along the water's edge.
82. Visually this belt of trees forms an important green backdrop to Everlands, one of the primary routes through the area and I consider that it's woodland character will be a recognised feature which will be valued by the wider public. Beyond its visual importance, it is clear that the area is used by different groups of people, whether it is children exploring or persons walking the dogs, in an attractive riverside woodland setting, close to where they live. I would not agree with the landowner's representative's contention that this site should be excluded on the basis of being an *extensive tract of land*. I am therefore in this case satisfied that the site does meet the expectations set out in the NPPF.
83. The final issue with the policy, is that as submitted it identifies the land as local green space but does not establish how planning applications affecting these sites should be determined. I will recommend that development on these sites should be ruled out, except in exceptional circumstances.

Recommendations

Add at the end of the first paragraph "which rules out development except in exceptional circumstances."

Delete LGS8 Street Farm Field from the list and Figure 15 and renumber accordingly.

Policy CAME1 - Safeguarding Employment Sites

84. There is some confusion as the policy is headed Safeguarding Employment Sites and the supporting text refers to 3 employment sites which are designated in the Stroud Local Plan, Draycott / Middle Mill Industrial Estate, Cam Mill and Coaley Junction Industrial Estate, yet the policy itself refers to "existing business premises" which could be individual buildings which are outside the designated employment areas.
85. I have concluded that the neighbourhood plan policy does not accord with strategic employment. The policy countenances that the economic activity on site could be lost, which would run contrary to the expectations of Policy EI1 of the Stroud Local

Plan which requires that any redevelopment of Draycott / Middle Mill Industrial Estate and Cam Mill should only be for employment generating uses and Local Plan Policy EI2 requires that Coaley Junction must include employment generating uses in any redevelopment. I have been advised that planning permission has been granted for the residential redevelopment of the Coaley Junction site but that does not affect my conclusion on this policy.

86. I consider that the policy does not meet the basic conditions in that it is not in accordance with strategic planning policy and I will be recommending that it be deleted, because as worded, proposals could come forward that meant that employment activity on these sites could cease.

Recommendation

That the policy be deleted.

Policy CAME2 - Encouraging Start-up, New Businesses and Home Working

87. I do not believe it is always necessary for the onus of demonstrating that the impact of proposals on the range of issues, which are set out in the policy, such as residential amenity, should fall to the applicant. These are matters that are properly discharged by the LPA in the consideration of an application. I will recommend the deletion of the final paragraph.

Recommendation

That the final paragraph be deleted.

Policy CAMUC1 - Cam Village Centre

88. I have no comments to make on this policy.

The Referendum Area

89. If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the Cam Neighbourhood Plan as designated by Stroud District Council on 4th February 2014, is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

90. I congratulate Cam Parish Council on seizing the opportunities presented by neighbourhood planning to allow the community to shape its planning policies. This is an area that will be the focus of new development over the next few years and the neighbourhood plan will sit beside the existing Local Plan in ensuring that the community can influence the largest schemes as they come forward.

91. This is a locally distinct neighbourhood plan which will provide a sound basis for dealing with planning applications in the Parish in the coming years.
92. To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.
93. I am therefore delighted to recommend to Stroud District Council that the Cam Parish Neighbourhood Plan, as modified by my recommendations, should now proceed to referendum.

██████████ BA(Hons), DMS, MRTPI
John Slater Planning Ltd
20th February 2020