

Date: 20 January 2020
Our ref:
Your ref:

Stroud District Council,
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

Property Consultants

Olympus House, Olympus Park
Quedgeley, Gloucester GL2 4NF
T 01452 880000
E paul.barton@brutonknowles.co.uk
W brutonknowles.co.uk
Offices across the UK.

Dear Sir or Madam,

**Representation for the Stroud District Draft Plan (November 2019)
CAM011 Land south west of Manor Close**

This representation has been put forward to illustrate why 'CAM011- Land to the south west of Manor Close, Cam', should be included as a proposed housing allocation in the upcoming publication plan (Reg. 19 consultation), expected in Autumn 2020.

This representation has been produced in support of previous representations made to both the Issues and Options and Preferred Options Consultations. Previous representations made should not be discounted.

The 2017 SALA sets out that the site has future potential for development. Comments consider that the site is suitable for housing or community related development. The site under the SALA was assessed at 3.73 hectares and its suggested yield was 100 dwellings. The actual area of the site is 5.9 hectares and based on the above methodology the suggested yield is 160 dwellings.

As part of the 2017 Issues and Options Paper (page 48), the site was included as a proposed allocation for a residential use. The site has since been removed as a proposed allocation from the Draft Plan and to date no commentary has been provided as to why this is the case. It is suggested CAM011 is reinstated within the upcoming publication plan (Reg. 19 consultation) for the following reasons set out below.

Site Description

CAM011 is located in close proximity to Cam's town centre and adjacent Cam's settlement development limits. CAM011 provides a natural rounding off of the settlement, to the east of Woodend Lane. Woodend land provides a natural boundary for development and it is not clear why this obvious settlement boundary marker, which was used in the Issues and Options Paper, has now discounted.

As stated in previously submitted representations and as set out in the 2017 SALA, CAM011 has limited physical constraints and is not contained within a sensitive landscape designation.

An initial desktop biodiversity and geodiversity assessment of the site provided by SDC, sets out that there is potential to develop the site without harm to a designated natural environment. Furthermore, as identified in the SDC's Landscape Sensitivity Assessment, the site has medium to low sensitivity to future housing uses.

Stroud Local Plan Review - Settlement Hierarchy

The Stroud District Settlement Role and Function Study Update 2018 - May 2019, contains information which has been used to determine the Draft Plan's settlement hierarchy. Each settlement has been analysed based on its ease of access to key services and facilities and the relative levels of community services and facilities which are available.

Cam is classified as a tier 1 settlement in the Draft Plan Report and is considered a very large settlement (second largest population after Stroud). Cam is the next largest individual settlement, but with a 2011 population of 8,000+ it is not in the same league as Stroud. However, Cam and Dursley are adjacent settlements and their combined population (14,800+) makes this a really significant conurbation and an important second focus for the District.

Table 4, page 27 sets out that Cam has the strongest local role, with several 'neighbourhood shopping' facilities and individual convenience stores located around the settlement, in addition to the main centre.

As set out in the SDC Draft Plan, it is proposed that around 895 dwellings will be allocated to Cam over the next plan period (up to 2031), in comparison to Stroud which only has 265 proposed dwellings.

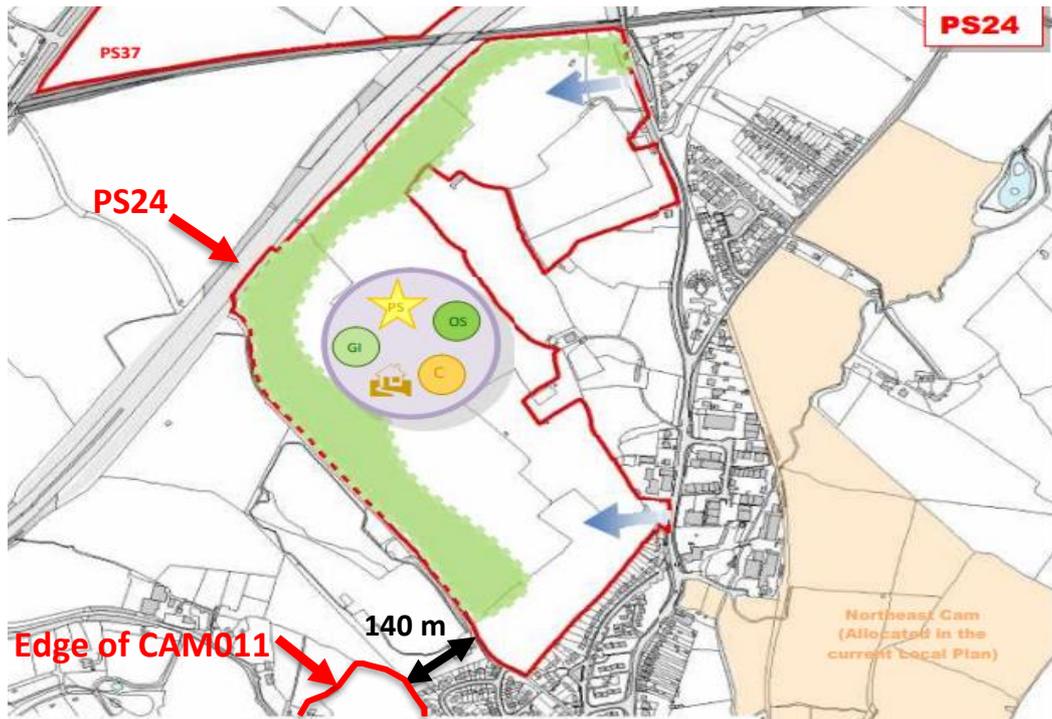
It is evident that Stroud has numerous landscape constraints which surround it and thus there is a lack of available sites. This is why the amount of proposed dwellings in Stroud is so low (265 dwellings). Given this, it should be considered that Cam should continue to be the primary focus for housing growth and that additional sites should be directed to Cam at areas close to its centre.

Stroud Local Plan Review – Draft Plan

The proposed growth of Cam is focused towards the Railway Station, rather than the centre of Cam, and it should be considered that development around the railway will not provide the choice of destinations which residents of Cam will require. There are other locations closer to Cam's town centre where the quality and viability of the town centre are maintained.

The site is located circa 140 metres (m) from PS24 – Land west of the railway station, which includes a playing field, athletic track and skatepark. PS24 will provide; strategic landscaping.

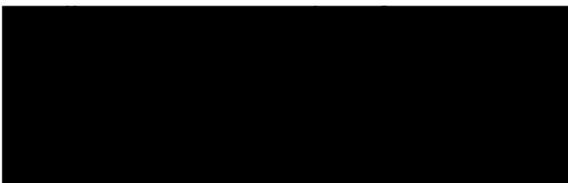
Other allocations include; PS25- Land east of River Cam, which will provide 180 dwellings and PS21, which will provide 15 dwellings.



Extract from SDC Draft Plan Cam Map

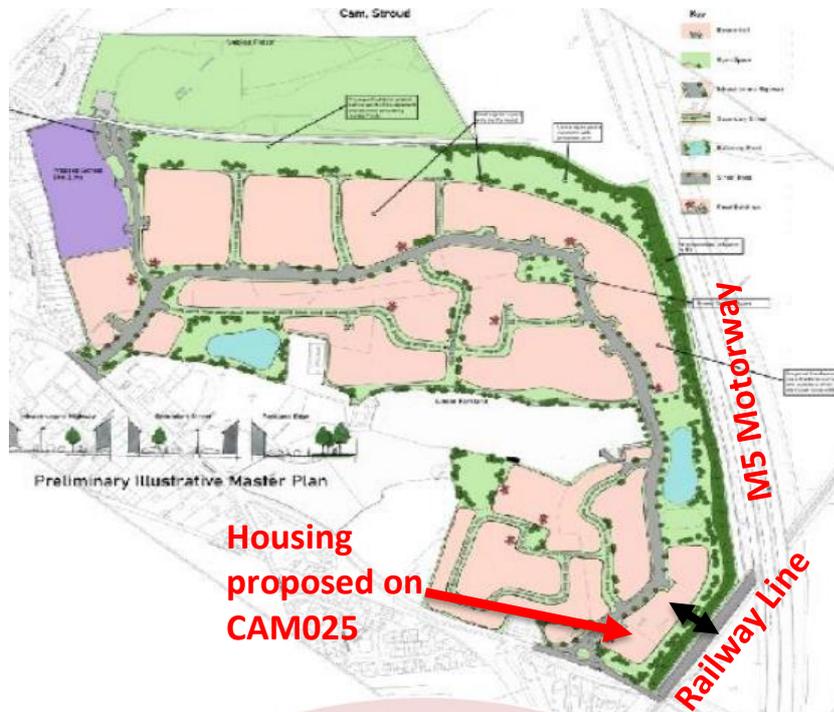
Some parts of the PS24 (adjacent to the railway line- CAM025) are circa 2 kilometres from Cam’s town centre. Our client’s land (CAM011) is circa 400m from the services and facilities in the centre. It is considered that the drive to provide development close to public transport nodes is being achieved at the expense of better locations within Cam. This can easily be redressed by the inclusion of our client’s land in order a greater amount of development is provided to serve Cam rather than serve the railway station.

In addition, it is important note that CAM025- see appendix A (included in PS24) is located circa 370 metres from Cam’s settlement development limits unlike CAM011 that is adjoining it. The development of CAM011 is clearly more sustainable than CAM025.



pared for Cam’s Draft Plan Public Exhibition, December proposed housing on CAM025 will be located circa 30 motorway. It is highly likely that noise pollution caused by adversely affect the future residents of these proposed

Clearly further investigations are needed to ascertain the likely impacts. CAM011 is located circa 520 metres from the M5 motorway and 1.2 km from the railway line and therefore the above impacts will not apply.



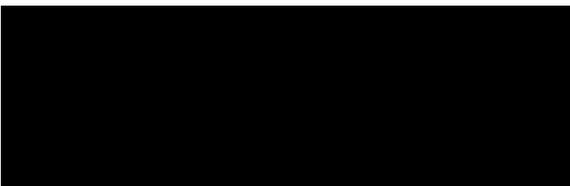
Cam Illustrative Masterplan

It should be considered that CAM011 has fewer physical constraints, no resulting impacts caused by noise pollution and is generally better located next to key facilities than CAM025 is. The site should come forward instead of CAM025 and should be included as part of Cam’s proposed urban extension.

For the above reasons CAM011 should be reinstated into the emerging LPR and in the upcoming publication plan (Reg. 19 consultation), expected in Autumn 2020.

Should you have any queries or require any additional information then please let me know.

Yours sincerely



Planner