

Via email only

Development Services
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20 January 2020

Dear Sir/Madam

**STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT PLAN
REPRESENTATIONS ON BEHALF OF MACTAGGART AND MICKEL**

These representations have been prepared by Knight Frank on behalf of our client, Mactaggart and Mickel, in relation to the Stroud District Local Plan Review: Draft Plan, consultation on which closes on January 22, 2020.

Our client controls the site known as Land at Lower Knapp Farm, Cam and has made representations to the initial Issues and Options public consultation, previous SALA exercises in respect to site reference "CAM010-Lower Knapp Farm, Cam", and to the Emerging Strategy Paper public consultation. A site location plan is appended to these representations.

Site Context

The site comprises of approximately 20 hectares of Greenfield land located to the north-west of the settlement boundary of Dursley. There are few physical constraints on the site. The Environment Agency identifies the site as being located within Flood Zone 1, and there are no statutory or locally listed buildings and/or monuments on or within close proximity of the site. There are a number of locations for potential access along Elstub Lane and Woodend Lane.

The site is located in a very sustainable location. The land is ideally located for residential development with a range of services and facilities within close proximity. The site is well served by existing public transport, with the nearest bus stop located within easy walking distance (350m) of the site. This stop provides high frequency connections to Dursley town centre, Woodmancote, Thornbury and Stroud. To add to this, Cam and Dursley train station is just 1.2 miles from the site.

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Site Deliverability

National Planning Practice Guidance sets out that when judging the deliverability of a site for plan-making purposes, an assessment should be made regarding the suitability, availability, and achievability of a development occurring. As set out in previous representations, these factors are addressed in turn below in relation to the site Lower Knapp Farm, Cam.

Suitability

Development at Lower Knapp Farm would be of a magnitude that would provide the community with a diverse range of residents due to a sound mix of type, tenure and size of housing. The integration of affordable housing units onto the site would encourage social cohesion.

Cam benefits from a GP surgery and pharmacy, situated near to the historic high street in the north of Cam. The medical centre is only 500m from the edge of the site. Additionally, Cam already benefits from a good range of leisure facilities including a sports club, cricket pitch, and a number of public open spaces and play areas. The CAM010 site is approximately an 8 minute walk from the Jubilee playing field and athletics track, and would further incorporate on-site provision for informal public open space, including the potential for a children's play area on-site. The provision of these recreational facilities on-site negates the potential loss of the recreational role that was set out in the 2017 SALA rejection of CAM010.

The site is well-located in terms of bus travel times/distance to a market town, supermarket, post office, community centre, primary retail, primary school and sixth form school. There is potential for a bus link to be incorporated into or near to the development which would enable easier access to these facilities, as well as the marginally further afield minor injuries unit and leisure facility.

The potential for landscape impact was one of the key reasons for rejection of the site during the 2017 SALA process. It is acknowledged that the site sits within the 'Rolling Hills and Valley's Landscape Type and that the upper levels of the site play a strong visual and landscape role given the topography. In contrast, the lower lying areas are visually well contained. Any allocation on the site would be capable of limiting the developable area, recognising and responding to the landscape constraints, which would be welcomed by our client. Housing development would be kept to parcels of land at low levels with limited landscape impact. The development would also include structured planting along the upper edges to enhance the site's ecological value and create a more treed character complementary to that found in the landscape around and to the north and east of Cam.

Availability

Our client represents the landowner who fully supports these representations and confirms there are no legal or ownership disputes. Our client holds an interest in the site and is an experienced and willing developer with a track record of delivering large sites across the UK.

Achievability

Should the site be required for residential development, the scale of development on the site would lend itself towards delivery with 5-10 years of achieving an implementable planning permission. Any proposal for development would include a mix of housing based on market and policy requirements at the time any detailed scheme is being drawn up. There is strong market demand for housing in this location which would further boost build-out rates and achievability within a 5-10 year timescale.

Stroud District Local Plan Review: Draft Plan

The overall direction of the Plan's vision is supported, including the designation of Cam and Dursley as a 'Tier 1 – Main settlement' which are the primary focus for growth and development. The strategy for Cam, particularly the new housing development, community, and open space uses to the north west, as set out on page 28 of the Draft Plan, is also supported.

However, we consider that the Draft Plan contains policies which are either unclear, inconsistent with national policy, not positively worded, or fail to maximise the development and growth opportunities available.

As such, we provide our comments on the relevant policies in the subsequent section below.

Core Policy CP2 and Core Policy CP3

The strategy set out at CP2 to deliver 'at least' 12,800 additional dwellings for the period 2020-2040 is supported. However, despite the useful inclusion of a 'level hierarchy', no additional guidance is provided within the policy itself or the supporting wording which provides an indication of how the housing target is expected to be apportioned across the four levels outside of the strategic and local development sites.

Strategic and local development sites provide cumulatively a maximum of 8,725 new dwellings across the Plan period, leaving a deficit of a *minimum* of 4,075 new dwellings to be accommodated across the District in the Plan Period, providing full delivery of all allocated sites. While CP3 goes on to set further definitions of acceptable development within, adjoining, and outside of the Settlement Development Limits (SDLs), no indicative figures are given of the expected housing target across the different levels.

We consider without any further guidance within Core Policy CP2 and Core Policy CP3, the hierarchy designation fails to adequately spatially guide appropriate development across the District in the most sustainable manner. A possible way to rectify this could be to identify indicative housing targets for each 'Parish Cluster' area, including a windfall allowance, based on each area's respective sustainability credentials and capacity to accommodate development.

Cam Strategy

The general strategy for Cam and Dursley is supported, including the allocation of significant housing and employment developments at Cam. However, it is not considered that the proposed strategy goes far enough to positively plan for required development, for reasons as set out above (CP2 and CP3) and the arguments for deliverability as set out on page 2 of these representations.

The existing approach does not appear to take into account the other sustainable options that exist for residential allocation in the locality. We suggest that the proposed allocations be reviewed for sustainability, and the approach to Cam be more clearly justified. There are available sites in locations that are closer to the core of the settlement that could further boost the vitality of the centre.

Cam Settlement Development Limit (SDL)

The revision of settlement boundaries as set out in Appendix A are supported, however it is considered that the small alterations made at Cam to accommodate site SDL-CAM01 at Strawberry Field/Elstub Lane is insufficient. The proposed minor alteration to the SDL is considered contrary to the overall growth strategy of concentrating housing growth at the main towns of Cam and Dursley, Stonehouse, and Stroud. We suggest that more scope is provided through CP2 and CP3 for development outside of settlement boundaries in sustainable location, as opposed to the very limited scope that is currently provided for.

Core Policy CP9 – Affordable Housing

Following publication of the updated Framework in February 2019 which added a number of new tenures to the definition of 'Affordable Housing', we consider the Local Plan should acknowledge, identify, and include the full range of affordable housing tenures which are considered acceptable, including: Affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership (See NPPF Clause 62 and Annex 2).

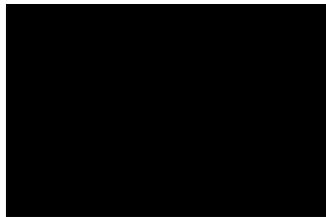
Conclusion

These representations have been prepared by Knight Frank on behalf of Mactaggart and Mickel Homes in relation to the site known as Lower Knapp Farm, Cam (site reference CAM010) and the Stroud District Local Plan Review: Draft Plan consultation which closes on 22nd January 2020.

Our client has an interest in promoting the site at Lower Knapp Farm on behalf of the landowners. These representations provide our general comments on the policies set out within the Draft Plan, in addition to promoting the site for allocation.

We trust the above is clear, however, if further information is required or you have any queries, please do not hesitate to contact me.

Yours faithfully,



Partner