

Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
Ebley Mill  
Stroud  
GL5 4UB

22<sup>nd</sup> January 2020

Dear Sir/Madam,

HLM012/NF/TK

**RE: STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT PLAN FOR CONSULTATION**

This representation is submitted on behalf of Hallam Land Management (HLM) by David Lock Associates.

HLM have an active interest in the evolution of the local plan and welcome the opportunity to provide further representations on the Stroud District Draft Plan for Consultation 2019.

HLM have a substantial track record in bringing forward land for high quality and sustainable developments and have a long-term interest in the successful delivery of growth in Stroud District.

**Land Adjacent to Cam and Dursley Station**

HLM have specific interest in land adjacent to Cam and Dursley Railway Station, Box Road, located within a proposed strategic location for growth in the Draft Plan. HLM submitted an application for outline planning permission for up to 42 dwellings, validated by Stroud District Council in December 2018 (reference 18/2697/OUT).

**The Overarching Development Strategy**

HLM support the Council's preferred overarching strategy for meeting Stroud District's future growth, concentrating housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud where there is best access to services, facilities, jobs and infrastructure.

Closely linked to this, HLM also support the more detailed intention (threaded through sections 2.3 Development Strategy, 2.4 Our towns and villages, and 2.7 Our town centres) to consolidate growth to the north east of the Cam, linking the parish centre with improved facilities at Cam and Dursley railway station and completing the linear park and local cycling and walking network.

**DAVID LOCK ASSOCIATES LIMITED**

50 North Thirteenth Street  
Central Milton Keynes  
Buckinghamshire  
MK9 3BP

☎ +44 (0) 1908 666276

✉ [mail@davidlock.com](mailto:mail@davidlock.com)

🌐 [www.davidlock.com](http://www.davidlock.com)

### **Core Policy CP2 – Strategic growth and development locations (p48)**

It is noted that there is a need to deliver at least 12,800 additional dwellings to meet the needs of the District for the period 2020-2040. This represents a significant uplift to at least 638 new homes per year, and a 40% increase in the current annual housing requirement (of 456 dwellings)

Given that Stroud District did not meet the Government's Housing Delivery Test and also experienced lower than required delivery rates in the two-year period 2015 – 2017 (due to delays to programmed delivery at major development sites), it is considered that there is an acute need to accelerate housing delivery in the District. Further delay or issues with only a couple of the sites identified in Core Policy CP2 would put the Council's housing delivery targets in jeopardy.

The Council should adopt a broader and more flexible range of housing sites within Core Policy CP2 to meet Government ambitions to significantly boost the supply of homes in the country to meet housing needs. In particular the NPPF places new emphasis on the encouragement of small medium sized housing sites to come forward in order to boost housing supply and offer quick deliverability.

It is unclear why a number of suitable sites and locations that have clear development potential have not been identified within Core Policy CP2. This includes, for example, sites identified by the Council as appropriate for additional development as set out within the Council's Strategic Assessment of Land Availability 2017 (SALA) (such as CAM015 Land west of Cam & Dursley Train Station, and CAM016 Land north east of Box Road Avenue). Sites in this location are also relied upon within the Council's Five Year Housing Supply (August 2019), and therefore this position should be more accurately reflected within Core Policy CP2. To assist with this the Council should either consider revising the existing settlement development limit boundaries to more accurately reflect the current situation in locations such as Cam and Dursley, or alternatively consider providing additional guidance regarding the exceptional circumstances for development adjacent to settlement development limits.

Such an approach would better align Core Policy CP2 with the overarching objectives of the Draft Plan to meet future growth at the main towns of Cam and Dursley, Stonehouse and Stroud where there is best access to services, facilities, jobs and infrastructure.

### **Core Policy CP3 – Settlement Hierarchy (p49)**

HLM support the proposed hierarchy for growth and development across the District's settlements, including the designation of Cam and Dursley, Stonehouse and Stroud as 'Tier 1 – Main Settlements' and therefore the primary focus for growth and development.

It is noted that Core Policy CP3 states that development will be achieved through strategic allocations, development within settlement development limits, town centres and employment sites and (Exceptionally) adjacent to settlement development limits, subject to fulfilling the criteria set out in the Plan's Core and Delivery Policies. However, and as set out above in relation to Core Policy CP2, it is considered that the settlement development limit in relation to Cam and Dursley should be reassessed in order to better reflect not only the Council's intention that this is a location for strategic housing growth (as indicated on Map 2 Development Strategy, and Map 3 Spatial Vision), but to also include locations with clear potential for deliverability as identified and relied upon by the Council in their Five Year Housing Supply (August 2019).

### **Cam & Dursley Development Strategy (p91)**

As set out above, the designation of CAM as a 'Tier 1 settlement' and therefore a primary focus for growth and development is strongly supported.

However, it is considered that there are additional sites beyond PS21, PS24, and PS25 that should be allocated within the Cam and Dursley cluster area to better support the overarching objectives of the draft plan.

In particular, allocating Land Adjacent to Cam and Dursley Station within the Draft Plan would achieve the following benefits, consistent with the overarching aims and objectives of the Draft Plan:

- delivery within highly sustainable location identified as the Council's key strategic location for growth;
- provision of a small-medium sized housing site to boost housing supply in the District and offer quick deliverability;
- opportunities for integration with adjacent development schemes to tie into and form the northern edge of the North Cam strategic urban extension;
- development within a highly sustainable location adjacent to Cam & Dursley Station, with potential to link into cycling and walking network;
- delivery of new affordable housing, potentially up to 30%;
- retention and enhancement of existing landscape elements and on-site provision of amenity green space, within a site not subject to any national or local landscape, ecological or archaeological designations; and
- sustainable urban drainage system with potential for infiltration.

We trust these comments are helpful and should you have any questions, or require any additional information at this stage, please do not hesitate to contact me.

Yours faithfully,



cc: Hallam Land Management Ltd