

Date: 22 Jan 2020
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Dear Sir or Madam,

**Representation for the Stroud District Draft Plan (November 2019)
Land on the North West Side of Uphorpe, Cam**

This representation has been put forward to illustrate why the entire site at Land on the North West of Uphorpe, Cam should be included as a proposed housing allocation in the upcoming publication plan (Reg. 19 consultation), expected in Autumn 2020.

The site has previously been submitted to the SALA in 2017, as part of a larger site, some of which has now been included within Draft Allocation PS25. The allocation continues development down from the existing allocation (SA3) to the north. The area of the subject site closest to River Cam has been included within this draft allocation (set out in the supporting location plan).

We agree that this area of Cam is ideal for further development as it is close to the centre of the settlement and therefore it has good accessibility to local facilities. The direction of development also follows the current pattern established by past allocations. The inclusion of the remainder of this land within the allocation would mirror the depth of development established by the existing allocation and would have the potential to include access via Uphorpe, improving connectivity in the area.

The parcel of land measures circa 14.61 hectares (36.11 acres). The current area of the site included within draft allocation PS25 is circa 4.4 hectares (10.8 acres), just over half the area of the whole allocation. The allocation is predicted to accommodate 180 dwellings and therefore the addition of the rest of the site would provide, at standard densities, 300 more dwellings. It is likely however that this number will be lower due to the green infrastructure provision, especially along the edge of the River Cam. The density of the draft allocation is 22.5 dph and at this density the additional area of the site could accommodate around 230 dwellings.



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There are limited physical constraints associated with the site. The majority of the site is gently sloping with some flat areas. There are small areas of flood zone 2/3 adjacent to River Cam but the remainder of the site is located in flood zone 1. The site is not located within any specific landscape designations such as AONB or Green Belt.

Within the 2017 SALA assessment of site CAM018 the height of the land is discussed, and a green buffer suggested at the 50-contour line. It is therefore unclear why the allocation only extends to the 45-contour line especially as the neighbouring existing allocation (SA3) goes above the 50-contour line in places. There is existing development up Upton above this height and the site is well screened by high vegetation along the River Cam even at this height. It is considered that the allocation should be extended, at the least, to match the contour of the existing allocation. If officers would be minded to support this extension a detailed landscape plan can be provided to demonstrate how any potential impacts could be mitigated.

 Local Plan Policies Map shows that the site is located directly adjacent to the Development Limit. This runs along the River Cam and up a short stretch of Upton. As mentioned, the site is to the south of an existing allocation and part of it is included within a draft allocation. The site is also located in close proximity to two "Key Employment Sites" at both Cam Mills, Everlands and Draycott/Middle Mill Industrial Estate. Cam's District Centre is also located 50m west of the site.

The adopted Stroud District Local Plan (2015) states that Cam is a Tier 1 Settlement and therefore it should be a "primary focus for growth and development to safeguard and enhance their strategic roles as employment and service centres". Cam has remained a Tier 1 Settlement in the review document. Cam is the second 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.

Cam is one of the most affordable areas in the district and therefore large numbers of new dwellings in this area will benefit both the local area and residents. The average housing price in Cam is £249,412 which is significantly lower than the average for Gloucestershire of £298,441.

Much of the housing which has been allocated within the emerging plan is allocated at Sharpness, with circa 2,770 dwellings proposed by 2031 and an additional 5,000 dwellings proposed by 2050. This is likely to be unviable due to the current lack of infrastructure and facilities in this area. Allocating so many houses in one area will produce slow delivery and build out rates in comparison

to allocations which are more spread out over various sites. There is also more of a risk, if the allocation were to fall out of the plan, the Council would be left with a large deficit of reserve housing sites to find.

The following desktop appraisal for Land on the North West Side of Uphorpe, Cam sets out any potential constraints to the site:

Allocations

The western area of the site, as previously mentioned, is currently allocated in the Stroud Local Plan Review as part of a wider allocation. This follows the pattern of development which was established in the Stroud Local Plan (2015). It is considered that the wider site is also suitable for development and is deliverable over the next plan period and should therefore be included as an allocation.

[REDACTED] heritage asset is 2, Rowley (1090916) which is Grade II listed and located circa 100 metres west of the nearest point of the site's boundary. It is considered that development of the site will not affect the heritage asset as it is already set within a built-up area. Additionally, there is a natural barrier between the site and the heritage asset of the River Cam and a strip of woodland which screens the site significantly.

Landscape

The site is not located within any specific landscape designations such as AONB or Green Belt.

Ecology

The site is agricultural land with limited ecological value. The field boundaries around and within the site consist of hedgerows and the occasional tree. These are likely to have some ecological merit. In the event of the development of the site the trees, and the majority of the hedgerows, would be retained and where possible enhanced to provide further ecological benefits. The western boundary is adjacent to the River Cam. There is likely to be ecological benefit in this area of the site and therefore it is envisaged that this area would be enhanced in any application.

Access

There is currently an agricultural access to the far east of the site leading onto Uphorpe.

There is a Public Right of Way, known as Cam Footpath 37, which through the centre of the site which would be accommodated for in any scheme.

Drainage

Environment Agency Flood Risk mapping for land-use planning, indicates that the majority of the site is located in a Flood Risk Zone 1. This indicates that the site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding) and can be developed. There is a small area of the site along Cam River which is located in flood zone 2 and 3.

Summary

In considering the above, there would appear to be no overriding physical constraints or potential impacts preventing sensitively located development for a medium to large scale housing scheme. Bruton Knowles would like to express that the site is under single ownership and that it is immediately available and deliverable over the next 5 years.

Yours sincerely,



Planner