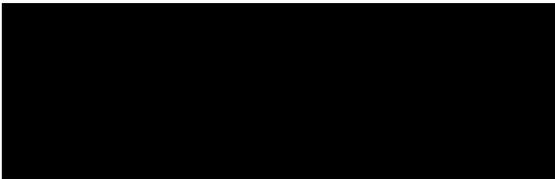


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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
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22nd January 2020

Dear Planning Strategy Team,

Local Plan Review – Draft Local Plan consultation – Land at Bowlers Lea, Cam

Strutt & Parker acts on behalf of Intro Crowd, owners and promoters of land at Bowlers Lea, Cam. We write in response to the Council's Local Plan Review and, specifically, the current Draft Local Plan consultation. Our comments are set out under what we feel are appropriate sub-headings.

Key issues

While we are broadly supportive of the 40 key issues and accompanying priority issues that have been identified in the Draft Plan, we have a couple of reservations about the ways in which the Council intends to tackle these issues. Firstly, while the Council intends to concentrate housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure, it is considered that this may give insufficient weight to ensuring that other settlements that may not have the best access in the district to services and facilities, but nevertheless are well served, are able to grow and sustain themselves. Therefore, it is considered that an additional bullet point could be added to the intended list of actions under the 'new housing development' priority issue to state that settlements with an existing range of services and facilities will be expected or able to deliver a proportionate amount of new housing to ensure that the vitality of these settlements is sustained into the future.

Secondly, while we understand the Council's desire to maximise the potential of brownfield sites to contribute to housing supply, the Draft Plan should also recognise that such sites will only be able to deliver part of the district's housing need. As a result, it is considered that greater recognition should be given to the role that greenfield sites will play in meeting projected housing need.

Draft strategy

We agree with the strategy to concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure.

Paragraph 2.27

We continue to support the notion of additional reserve sites being identified to ensure that the updated Local Plan is robust and contains a sufficient supply of deliverable housing sites, particularly as there is a high likelihood that some of the larger allocations identified in the Draft Local Plan will not deliver at anticipated rates.

The district's housing needs

It is considered that the Draft Local Plan continues to place too much reliance on potential site PS24 (Cam North West/West of Draycott) to meet the housing needs of Cam. At up to 700 dwellings, it is apparent that this strategic site will take a significant period of time to be completed and that any delays or issues with the site could have a serious impact on the ability for this quantum of development to be delivered within the plan period. Not only would this harm the growth plans for the settlement, it would also have a detrimental effect on the growth plans of the district.

As a result of the above, it is considered that greater consideration should be given to the alternative sites surrounding the settlement, particularly our client's land identified as site CAM024 in previous versions of the Local Plan Review. We describe this site as Land at Bowlers Lea, given that the likely access point would be via this existing road.

When the Council assessed the site as part of a previous Strategic Assessment of Land Availability (SALA), it was considered to be unsuitable for development because of the likely high landscape impact. Specifically, according to the Council *"Development on the rising slopes would impinge on their function as backcloth to the settlement as well as potentially being highly visible to the wider countryside and the M5 to the north"*.

Aspect Landscape Planning were previously appointed to review the potential landscape and visual effects relating to the development of our client's site and the resulting Landscape Technical Note accompanied our previous representation.

The Technical Note concluded that the site is clearly well contained by existing vegetation and topography, with views towards the site only being readily apparent from its immediate setting, rising landscape to the west and the wider landscape setting to the east and south. It is not considered that the site is 'highly visible' from the M5 to the north, with the motorway corridor being lined by mature vegetation associated with the embankments, which when combined with the localised topography, entirely contain views of the site. Whilst it is acknowledged that the undeveloped nature of the site provides some contribution to the backcloth of Lower Cam from the wider landscape setting to the east, the green ribbon of backcloth land perceived from the Cotswolds AONB largely precludes the site itself. The apparent backcloth land comprises the higher east facing slopes of the localised hill to the west of the site. In other words, when our client's site is viewed in isolation, it does not make a meaningful contribution to the backcloth of the settlement, as originally perceived in the Council's SALA.

The Technical Note went on to add that *"It is therefore considered that the site and receiving environment have the capacity to accommodate sensitively designed residential development. The proposals will not result in significant harm to the landscape character or visual environment and, as such, it is considered that proposed development can be successfully integrated in this location and is supportable from a landscape and visual perspective"*.

In our view, the site specific review undertaken by Aspect Landscape Planning demonstrated that the previous concerns raised by the Council in relation to site CAM024 are unfounded and that the landscape to the west of Cam will only be harmed should the rising land beyond our client's site be built on.

A Landscape Capacity Plan was included within the Technical Note, which demonstrated how well contained the site is and how a residential development could be accommodated. This Capacity Plan

indicated that around 30 dwellings could easily be delivered on the land, without harming the surrounding landscape. While this plan was only indicative, it demonstrated that a residential development on site CAM024 would represent a logical addition to the settlement.

It is considered that this site should be given greater consideration by the Council as a potential housing allocation in the updated Local Plan. At the very least, it is submitted that our client's site should be considered as an additional reserve site, to be brought forward in the event that the larger strategic allocations within Cam and the wider district do not deliver at the expected rates.

The site could also accommodate build to rent homes or self and custom built homes to contribute towards meeting the Council's aspiration for a greater range of housing types.

In summary, it is considered that site CAM024 (Cam North West/West of Draycott) is an excellent potential development site with no fundamental constraints. It is 'deliverable' as defined by the National Planning Policy Framework 2018 (NPPF), being immediately available, offering a suitable location for development on the edge of the district's second largest settlement, and being achievable with a realistic prospect that housing on the site will be delivered within five years. We believe that development on this site could be achieved without causing undue harm to the surrounding landscape and the visual amenity of the settlement.

Cam offers an excellent range of community services and facilities and when considered alongside Dursley, represents the best access to key services and facilities of anywhere in the district. It is therefore considered that the settlement is capable of accommodating further housing development and that there is no reason why our client's land at Bowlers Lea could not contribute towards meeting this growth.

Thank you for taking the time to consider this representation.

Please get in touch if you have any queries or if you wish to discuss the merits of our client's site further.

Yours sincerely

