



[www.pjs-development-solutions.co.uk](http://www.pjs-development-solutions.co.uk)

Tel: 01452 546169 / 07923 697833

Email: [philipstaddon@blueyonder.co.uk](mailto:philipstaddon@blueyonder.co.uk)

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**Local Plan Consultation**  
**The Planning Strategy Team**  
**Stroud District Council**  
**Ebley Mill**  
**Westward Road**  
**Stroud**  
**GL5 4UB**

15 June 2018

Dear ██████████

**Stroud District Local Plan Review – Further Millfields Housing Development Phases – North-East Cam**

I refer to our meeting with you on 4<sup>th</sup> June 2018 regarding the above. There are a number of points that we consider are important to record.

First, may we thank you for meeting us and providing a timely update on the Local Plan Review and the challenges Stroud District Council faces in meeting future housing requirements. It was extremely useful and will assist us with our longer term planning for land interests in the strategically important Cam area.

Second, as we explained, Bathurst Ltd has adopted a 'plan led' approach to the promotion of the current Millfields development. It has respected the planned approach to housing numbers and the need to balance housing and employment opportunities. However, we have also been very open with you, and Cam Parish Council, about longer term opportunities for the delivery of a much larger urban extension (circa 1500+ homes). Much of that land has been promoted through the usual channels and masterplans have been produced and shared with you and your colleagues over the years.

Third, the Local Plan SA 3 strategic allocation at north-east Cam has been successfully progressed through an Outline planning application

(S.15/2804/OUT). This initial stage of the Millfields development comprises 450 new homes (135 affordable) and significant areas of employment land (10.7 hectares).

Fourth, after many years of hard work and significant investment, the Millfields development will soon commence delivery on site. The first phase of housing (137 units) will be the subject of a 'reserved matters' submission by a quality national housebuilder which will be submitted in the next few weeks. Bathurst Ltd has already made submissions on the 'pre-commencement' conditions attached to the Outline permission. Housebuilding is expected to commence on site in early 2019. We also intend to market the first employment land phase (we await confirmation from your colleagues that our marketing strategy, submitted in January, is acceptable).

Fifth, once development commences in early 2019, we anticipate that delivery of new homes will average somewhere in the range of 55 – 75 units per annum. That would suggest a 6 – 8 year build out period i.e. 2025 – 2027 and comfortably within the current Local Plan period, which runs to 2031.

Sixth, Bathurst Ltd is concerned by recent speculative applications and associated decisions in the area. In particular, the decisions to grant planning permissions for 90 units (S.17/1366/OUT) and 36 units (S.170964/OUT) on unallocated sites, outside the Cam settlement boundary, seem surprising. Allowing such *ad hoc* development appears to constitute a significant departure from the development plan led approach, set down in statute. Furthermore, it dilutes and undermines the Local Plan strategy.

In the light of the above, we would urge you to positively consider the expansion of Millfields through further allocations in the Local Plan Review. It does seem sensible and sustainable to evolve the existing concentrated growth strategy. In the Cam area, this is best achieved by expanding Millfields in a comprehensive and planned manner.

You advised at our meeting that your considerations would be limited to land that is likely to be deliverable in the foreseeable future. To assist your considerations, we have attached a summary plan which maps the existing consented Millfields housing and employment phases (H1 – H5 and E1 and E2) and identifies three further phases.

The further three phases, marked H6, H7 and H8, are unconstrained and available to Bathurst Ltd to develop. Applying a relatively conservative density (25 dwellings / gross hectare), gives a yield of 365 dwellings. Increasing the density to 30 dwellings / gross hectare, would yield 438 new homes. This would be a substantial and significant contribution to the district's future housing requirements. The homes would be in a highly sustainable location, close to the

local centre, schools and employment opportunities (including those with the consented Millfields development).

Bathurst Ltd considers that the case for allocating these additional phases, through the Local Plan Review, is compelling, given the need to secure significant additional housing in sustainable locations.

It is also worth stating that, over the longer term, substantial further areas of land to the east of the consented Millfields development (and below the 50 metre contour), are likely to become available for development. There is scope here for a major sustainable urban extension to unfold, in a planned and comprehensive manner, well beyond the Plan period.

We trust that you will consider these submissions and respond positively. If you require any further information or wish to discuss these proposals further, please do not hesitate to contact me.

Yours sincerely,

*P. Staddon*

Philip Staddon BSc, Dip, MBA (Distinction), MRTPI

Managing Director – PJS Development Solutions Ltd