

EXAMINATION OF THE STROUD LOCAL PLAN REVIEW

Matter 6d - Cam and Dursley Site Allocations

Submission from Cam Parish Council.

PS24 CAM NORTH WEST

Matter 31 (a) reference paragraph 3.3.6 requirement to meet the day to day needs of residents of the new development.

Proposed Amendment - Insert a new requirement as follows:

'On-site provision of at least 350m² of convenience grocery shopping floorspace to serve the day-to-day grocery shopping needs of residents.'

1. **Justification** – The Settlement Role and Function Study Update 2018 (EB72) indicates that Cam has best-in-district availability of local services, pointing to a network of convenience stores and a centrally located Tesco supermarket. In reality, to the North of the Tesco store in central Cam, there is only one limited convenience store located within the Shell Garage on the A4135, located outside the southern site entrance of PS24.
2. Retail And Town Centre Advice (Eb34) Table 4.1 indicates that net sales area of convenience goods floorspace within Cam and Dursley has declined (at 2021 and is forecast to decline further to 2040).
3. No retail provision was required by the Adopted Local Plan to support the Millfields development (Adopted Local Plan Site SA3). The Local Plan Review development strategy for Cam does not indicate a requirement for any retail provision to support a potential cumulative 1530 dwellings resulting from the SA3 (450 dwellings), PS24 (900 dwellings) and PS25 (180 dwellings) over existing developments nor for the further 260+ homes additionally granted permission for (windfall).
4. The existing convenience store would be over 1km from housing that would be developed in the north and west of PS24 site. The closest part of the PS24 site is a 1km walk from the Tesco in Cam Village Centre and the furthest part of the site is 2km from the centre (Tesco is the next closest shop selling groceries).
5. The Council's strategy is focused on moving people from the allocation sites to access local services, either via public transport or active travel strategies. The walking distances indicated are further than are reasonable for grocery shopping trips. The provision of an on-site convenience store would reduce the requirement to drive to larger local shops for daily grocery needs and meet wider needs to maintain local services provision in accordance with Cam's Tier 1 Settlement Status.

Matter 31 (b) 18 criteria listing requirements – justification, clarity, effectiveness.

Proposed Amendment to Criteria 1. *‘Approximately 900 700 dwellings, including 30% affordable dwellings, to address tenure, type and size of dwellings needed within the Cam and Dursley cluster area’;*

6. **Justification** - The proposed increase in site capacity from 700 to 900 dwellings was arbitrary and not underpinned by evidence that the site could deliver the additional homes. Stroud District Council has set requirements in policy PS24 and so it is relevant to consider whether the requirements in combination are deliverable before the site capacity is set in the Local Plan.
7. **Compliance with Cam Neighbourhood Plan Design Code** - Because of their nature, requirements set by Criteria 2, 4, 5, 6 and 7 reduce the amount of land available for built development. Criteria 9 requires layout, density, built form and character of development within the site to conform to the Cam Neighbourhood Plan Design Code. The question is therefore whether criteria 9 can be complied with within the land available for built development once the land take for other criteria are taken into account.
8. Previous submissions by Cam Parish Council commented on the available net-development area and the implied densities resulting from the delivery of 900 dwellings within it. It presented evidence demonstrating prevailing development densities in different parts of Cam. The Design Code has important elements which indicate how the design of new development in Cam should be undertaken. This includes:
 - A high degree of permeability for pedestrians and cyclists between different parts of Cam
 - A ‘sylvan’ feel to the village with low development form nestled amongst significant tree cover
 - Green infrastructure running through development blocks
 - Locally distinctive design
 - Protection of views and of AONB
9. So far, Stroud District Council has simply reasserted that the proposed development of PS24 must be undertaken in accordance with the Cam Neighbourhood Plan Design Code. At best, this implies (but it is not stated) that it believes the apparent conflict between the two can be reconciled through high quality development design, or worse, that it has not considered the matter sufficiently to form a view. No evidence of this assessment is presented either way.
10. The made Cam Neighbourhood Plan is part of the development plan for the district and the ability to meet the policy requirements of the development plan should be considered in assessing new site allocations. The role of local design codes is established within a hierarchy of design considerations from the National Model Design Code, through District-level Design Codes and Policies, and within Neighbourhoods. Provided the Local Plan Review does not make important changes to the consideration of design (which it doesn’t), the Cam Neighbourhood Plan Design Code will remain a relevant part of the development plan.

11. There are current applications for development of PS24. This means we can see what practical approaches are necessary to deliver the required number of homes on the site and how these relate to the requirements of PS24 including the Cam Neighbourhood Plan Design Code. Stroud District Council would rightly say that its allocation policy is one thing and an application by a developer is another. Nevertheless, the densities proposed in the development areas of the site in these applications ranges from 40 dwellings per hectare to 50 dwellings per hectare with significant blocks of development at 3-storeys, indicating constraints which create a clear variance from the Cam Neighbourhood Plan Design Code. This was foreseen in Cam Parish Council's previous submissions. There may be other ways to develop the site, but it is clear that the very high densities proposed are a function of the site capacity proposed in PS24 criteria 1.
12. There is reason to believe that this position could change further because responses from statutory consultees to the current applications indicate that proposed buffers and mitigations along the M5 motorway boundary and drainage routes may need to be amended – these are unlikely to increase land available for development and could reduce it further.

Matter 31 (c) assessment of impacts from development on existing infrastructure – justification, matters included, clarity of requirements.

Comment on justification, clarity and effectiveness in relation to employment and services

13. **Employment** - According to the Settlement Role and Function Study Update 2018 (EB72), Economic Activity Rates in Cam are below-average due to a high proportion of retirees. Among those who are economically active, there is large net-export of workers out of Cam. In 2011, Cam had more than twice as many economically active residents available to work than there were jobs available. Whilst Cam has a high number of jobs in its area on a district basis, this is not sufficient by any means to support even the relatively lower proportion of economically active people living and available for work in the area and as such it has a low employment density – for every two economically active people living in Cam, at least one has to commute out of the area. Unless significant new sources of employment are provided and the types of jobs are a suitable match, new housing development in Cam is likely to increase the significance of commuter outflows.
14. Whilst Cam is a large net-exporter of workers, the jobs that do exist locally appear to be filled in good proportion by local residents. This gives cause to believe that if more local jobs were created then they would be likely to be filled by local residents (of course, depending on the type of jobs created). The report also indicates that Cam has had a disproportionately high share of new housing development (2011-2018).
15. The Settlement Summary for Cam describes this position incorrectly to conclude that a high proportion of local residents work in local jobs and fails to consider the number of people driving longer distances to work.
16. In this context, it is surprising that the Local Plan Review Proposals for Cam do not include requirements for new employment land provision to accompany significant housing allocations. More housing without additional employment will increase net exporting of jobs (not sustainable) and increase the dormitory role of CAM (not desirable as an outcome).

17. The 2015 Adopted Local Plan site allocation SA3 was consented for 450 dwellings and approx. 11 hectares of employment land (was B1, B2 and B8). A part of the employment allocation should have come forward in the first phase of development alongside housing - this has yet to be delivered.
18. Without development of existing allocated and consented employment sites to address the existing net export of jobs, and without further employment provision to match new housing allocations, it is hard to see how new housing development in Cam will do anything other than stimulate further out-commuting from the area.
19. Stroud District Council has assessed the sensitivity of PS24 for housing development and employment development and concluded that the site is sensitive to employment development forms in landscape impact terms. New employment land provision within Cam would need to be found on other sites.
20. Given that Dursley has a similar profile of strong local occupation of jobs available but an insufficient amount of employment leading to significant out-commuting and low employment density, a clear strategy is lacking to allocate land to meet the combined employment needs of Cam and Dursley to support additional housing.
21. **Availability of Services** – The development strategy for Cam and Dursley is presented as a coherent strategy for the area as a whole (as a conurbation). The assessments on which it is based consider Cam and Dursley separately. The Settlement Role and Function Study Update 2018 (EB72) clearly indicates that Cam’s position in terms of strategic services and facilities is weaker than Dursley’s and that people within Cam rely on strategic services provided in Dursley, as do communities in the Severn Vale more widely.
22. The Local Plan Review Development Strategy does not propose to remedy this by increasing the availability of strategic services within Cam, but instead foster sustainable transport and active travel links from Cam to Dursley to access strategic services. The question is whether strategic services in Dursley are sufficient to meet the combined requirements of both settlements including significant growth in Cam.
23. Comparison Retail - Retail and Town Centre Advice (EB34) Table 4.2 forecasts decline in net sales area for comparison goods floorspace in Cam and Dursley between 2021 and 2040. The Development Strategy for Dursley contains two small sites proposed for allocation within Dursley Town Centre, for mixed uses. More widely, the advice refers to changes in permitted development rights which will require a wider consideration of changes of use away from comparison retail to other uses, potentially further weakening town centre retail provision in Dursley over time in favour of a wider range of uses including housing.
24. Indoor Leisure Facilities - The Stroud Indoor Sports Facilities Needs Assessment (EB42) refers to data related to the Indices of Multiple Deprivation which indicate lower levels of physical activity in Cam and Dursley than in the rest of the district, and in the worst quartile nationally. Figure 3.6 also indicates a sharp reduction in preparedness to travel to leisure centres once journeys exceed 6-10 minutes (when 99% would be prepared to travel, to 67% at 11-15 minutes and 14% over 20 minutes).
25. There are no indoor leisure facilities in Cam and there are no local plan proposals to provide any additional facilities in Cam or in Dursley and little scope to expand current facilities. The Assessment

(EB42) refers to the facilities provided to serve the Cam and Dursley settlement and wider Severn Vale. The Pulse Leisure Centre in Dursley Town Centre is described as very busy and adjacent car park as extremely-well used. There is little scope for physical expansion of this site. Further ‘dated’ provision exists within Rednock School which is cramped and unattractive.

26. The data presented in the assessment based on the application of Sport England Facilities Calculators is not applied to the population in the cluster and to the projected population growth resulting from development. It is therefore not possible to know what effect the delivery of significant new housing development will have on standards of indoor leisure provision as a result of local plan implementation.
27. In this general context and in the absence of specific proposals to improve indoor leisure provision, a growing population in Cam and Dursley and other parts of the cluster that use services in Dursley will need to rely on the use of an already very busy facility. Travel times to visit The Pulse are likely to test the willingness of most people living in new developments to the north of Cam, unless travelling by car. The overall position is that existing assets will be sweated and quality of experience will decline. People may need to drive further afield to access indoor leisure facilities and may be discouraged from active indoor leisure activities.

Matter 31 (d) Duplication of requirements.

28. Refer to previous submissions

Matter 31 (e) reference paragraph 3.3.9 requirement for substantial structural landscaping in relation to setting of AONB – ref to NPPF para 176 and clarity of requirement.

29. Refer to previous submissions

Matter 31 (f) reference 3.3.10 requirement for mitigation of impacts on Severn Estuary SPA, SAC and Ramsar Site – suitability of assessment of impacts and identification of the extent of mitigation required.

30. Refer to previous submissions

PS25 CAM NORTH EAST EXTENSION

Matter 32 (a) 8 criteria listing requirements – justification, clarity, effectiveness.

Matter 32 (b) assessment of impacts from development on existing infrastructure – justification, matters included, clarity of requirements.

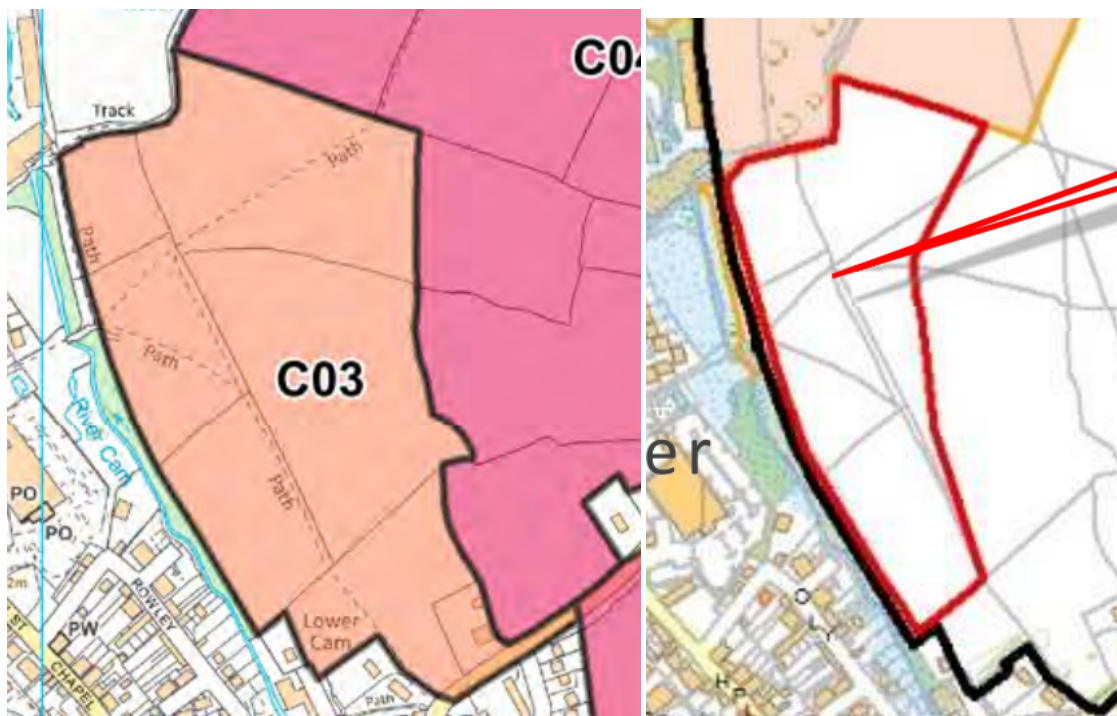
Matter 32 (c) suitability of assessments undertaken to support allocation of site, including for local facilities and services, flooding, impact on AONB, impact on wildlife

RESPONSE TO 32 (a)(b)(c) Proposed action - delete policy PS25

31. **Justification** - The Landscape Sensitivity Assessment (EB36 and EB36a) for land parcels around Cam identify the land subject to proposed allocation PS25 as ‘C03’. The summary in relation to sensitivity to housing use speaks for itself – *‘The area’s sensitivities lies in its steep slopes to the east, its role*

*continuing the soft green edge to the settlement along the River Cam corridor and contributing to the separation between Cam and Upthorpe, the mature riparian vegetation along the river and other mature trees and hedgerows. Its value lies in its contribution as part of Escarpment Foot Slopes landscape within the context of the AONB, and leisure use on PROWs. Housing development may be able to be accommodated on three fields adjoining the river corridor although not desirable due to the current positive edge to the settlement, at least in the short term. Development on the higher sloping valley sides would also be undesirable.’ The sensitivity level is **medium** which in the summary table in EB36 has been changed to ‘medium/low’ without discussion or justification.*

32. The image on the left shows parcel C03 and the three fields referred can be seen. The image on the right shows the proposed site allocation PS25. The eastern part of PS25 lies on the slopes referred to and is open, which is clearly undesirable according to Stroud District Council’s own assessment. In a NPPF paragraph 176 context, the setting of the AONB is not protected by a series of developments advancing towards it, buffered by planted strips. The value of the current boundary formed by River Cam is that this is established and development nestles behind it. The effects of the development of PS25 will persist through the plan period given the starting position on exposed slopes, no border planting and the AONB sitting above.



33. **Site Constraints and densities** - Stroud District Council is forming its Local Plan Review with the Made Cam Neighbourhood Plan in place. Policies which set a development boundary in the Neighbourhood Plan can be overtaken by strategic land use policies and site allocations, as is occurring here. That is within the remit of the Local Plan to set out.
34. The Neighbourhood Plan also contains active strategy and policies for the creation of green infrastructure corridors along the River Cam, on PS25. It also contains active proposals for

strengthening of public rights of way east from the River Cam across PS25 and up the slopes towards the AONB. These matters were addressed in Cam Parish Council's previous submission on proposed allocation of PS25 and there was no response from Stroud District Council on the matter.

35. Neighbourhood Plan Policy site constraints on the development of PS25 should be recognised, which would increase further the sensitivity to development in the landscape sensitivity assessment context, or would need to be taken into account in determining the capacity of the site for development.
36. The Cam Neighbourhood Plan Design Code considerations apply as they do for PS24. Requiring compliance with the Design Code should have effects on approach to development of allocation sites and in this instance would serve to require permeable, nestled, lower density development. Cam Parish Council has already provided evidence as to how this appears to conflict with the anticipated capacity of 180 dwellings from PS25.
37. **Comment on justification for required contributions** - As much as PS24 fails to consider requirements for provision of or contributions to supporting facilities, PS25 includes many more requirements from a smaller development site. The rationale is unclear and speaks to the lack of an overall assessment of the adequacy of current capacity of facilities and services to meet the needs of existing population. The effects of planned development population growth has not been factored in to reach a considered view of needs including where this should be met, whether land can be identified for it and how it should be funded.