

CAM PARISH COUNCIL
Stroud Local Plan Review
Regulation 19 Consultation
Representation

Site Allocation Policy PS25

Introduction

NPPF para. 35 sets out four 'tests of soundness' for local plans

- a) Positively prepared— providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
- d) Consistent with national policy— enabling the delivery of sustainable development in accordance with the policies in this Framework.

In respect of b) the plan should be based on a robust and credible evidence base, backed up by facts and the participation of the local community and others having a stake in the area. The plan should also provide the most appropriate strategy when considered against reasonable and realistic alternatives and subject to sustainability appraisal.

Failure to Give Appropriate Weight to Policy and Guidance within the Made Cam Neighbourhood Development Plan and Landscape Sensitivity Assessment Evidence Bases for the Stroud Local Plan and Cam NDP.

Cam Parish Neighbourhood Development Plan 2019 - 2031['Cam NDP'] was prepared based, in part on a landscape sensitivity study of the area including a detailed assessment of landscape sensitivity of all potential development areas within Cam Parish. This assessment formed part of the evidence base that supported the policies in the Cam NDP that was endorsed by Stroud District Council on 4 June 2020 following examination and referendum. The evidence base for the NDP sets out a more localised appraisal of the landscape in the Cam "Landscape Sensitivity Assessment" (Potterton Associates Nov 2018) which supplements Stroud District Council's "Stroud Landscape Sensitivity Assessment" (White Consultants Dec 2016). Both studies concluded that it would be undesirable to develop site PS25 for the following reasons:

1. the relationship of PS25 with the River Cam

2. views of PS25 from the Cotswold AONB
3. the relationship of PS25 with Cam's built area
4. the access and amenity value of connecting public rights of way through the site into the open countryside from the Rackleaze Local Nature Reserve.

Cam NDP Policy CAMES1 (green infrastructure and biodiversity) and supporting plan (fig 7):

1. notes that the River Cam forms a distinct eastern boundary to the village
2. identifies Rackleaze, the River Cam and connecting public rights of way as key green infrastructure assets.

The proposed allocation of PS25 for development fails to have appropriate regard to:

1. the adopted Cam NDP
2. the Stroud Local Plan Review's published landscape evidence base.

Accordingly, the Stroud Local Plan Review is contrary to guidance set out in the NPPF, specifically:

- Para. 16 c) in that the Plan has not been shaped effective engagement between plan-makers and communities and specifically the policies in the adopted Cam NDP;
- Para. 35 b) in that it does not take into account the reasonable alternatives and is not supported by the Council's own evidence

In support of the Parish Council's contention that the Stroud Local Plan Review is not sound:

1. Local Plan Policy PS25 (Clause 6) requires:

"A layout, density and built form and character which conforms to the Cam Neighbourhood Plan Design Code"

However, as stated above, the policy allocation as written does not identify criteria that specifically require the protection of key environmental and community assets identified in the Cam NP (Policy CAMES1 (Fig7)).

As a result it has been allocated for a housing density and coverage that will be unlikely to be capable of conforming with Policy PS25 Clause 6 and adopted NP policy CAMES1.

It is there considered to be undeliverable, contrary to NPPF Para 16 (b); deliverability.

Cam PC's would recommend Site PS25 is deleted from the Stroud Local Plan.

This would enable to plan to be in conformity with NPPF Para' 35 clause (b) by demonstrating a direct and positive response to;

- Policy CAMES1 of the Cam Neighbourhood Plan
- Published Local Plan and Neighbourhood Plan published and validated landscape evidence

CAMES1 policy attached

Green Infrastructure and Biodiversity - Policy CAMES1

Objective

- O1 Protect, improve and extend the Green Infrastructure network across the Parish, ensuring a functional and well connected resource that contributes to a high quality environment for people, including those who have mobility issues, and wildlife.

POLICY CAMES1 Green Infrastructure and Biodiversity

Development adjacent to, or containing identified Green Infrastructure network assets and priorities (Figure 7) should protect and, where feasible, improve and extend the network. Development in other locations should protect green on-site infrastructure and will be encouraged to enhance the network where feasible.

Where development results in the unavoidable loss of existing Green Infrastructure replacement should be provided on-site. Where this cannot be delivered, appropriate off-site provision should be agreed.

Development should preserve and protect priority habitats as illustrated in Figure 6, and where possible provide net gains for biodiversity.

Explanation

Green Infrastructure (GI) is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green Infrastructure is important to the delivery of high quality sustainable development, alongside other forms of infrastructure such as transport, energy, waste and water.

Cam's GI network is extensive and varied for both wildlife and people. Figure 6 illustrates the location of wildlife sites and habitats in the Parish. There are also many different places that benefit people's wellbeing including accessible natural green spaces, play areas, allotments and recreation grounds, together with the many 'snickets' and Public Rights of Way. This GI network has many and varied benefits for the environment, biodiversity and for people; it can help contribute to the health and wellbeing of communities, it can inform a proactive approach to mitigating and adapting to climate change, and it can inform where priorities should be for protection and enhancement. It is also an important part of what gives our Parish a distinct identity and makes it a good place to live.

Figures 6 and 7 identify existing assets, priorities and opportunities as detailed in the Cam Green Infrastructure Report (2019). The Stroud District Open Space and Green Infrastructure Study 2019 (another key reference in this evidence base) includes analysis of the existing quantity, access and quality of open space and GI, considers future requirements for open space from population growth, and identifies priorities. The Cam and Dursley Cluster Sub Area Analysis Report (part of the Stroud report mentioned ahead), demonstrates the overall requirement for new open space provision within Cam and Dursley cluster from new development.

The Cam Design Code (2019) also clearly sets out the importance of existing

Environment and Sustainability

GI assets in the Neighbourhood Plan area, and also sets out more detail about where priorities and opportunities for GI exist. Green Infrastructure in Cam is established to be a key element in delivering locally distinctive place-making in Cam.

The requirements for onsite provision will depend on the size and location of new development and is based on the predicted population growth (for any required provision that cannot be provided on site, where possible CIL (Community Infrastructure Levy) contributions should be provided for off-site provision/improvements).



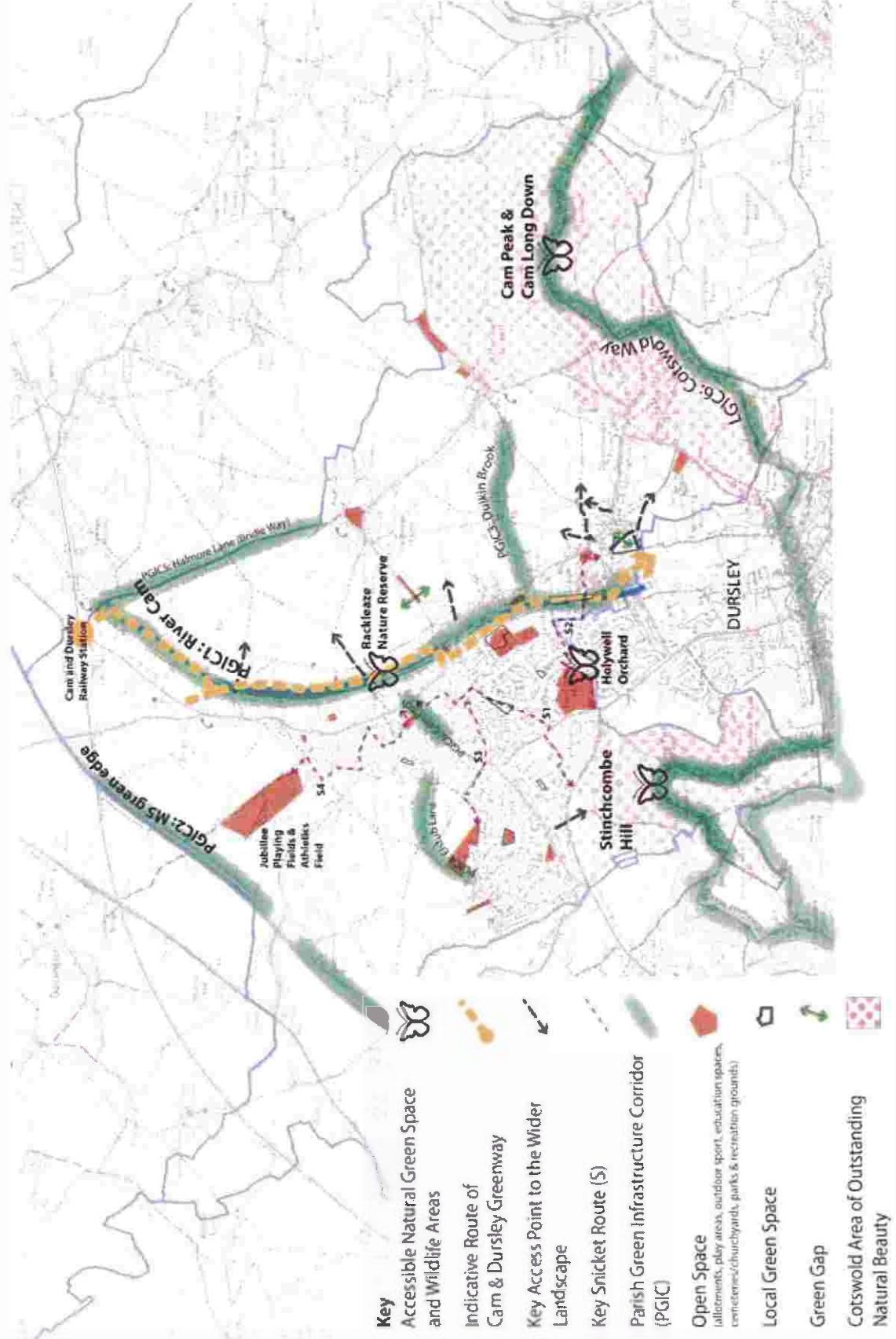
Building with Nature

Because of the particular importance of landscape and green infrastructure in and around Cam, the Neighbourhood Plan advocates an approach to development that adopts the principles of the Gloucestershire based “Building with Nature” standards.

Building with Nature sets out a framework of standards divided into three themes: core, wellbeing, water and wildlife. The aim is to enable the delivery of high quality green infrastructure at each stage of the development process, from planning and design, through to long-term management and maintenance.

The Cam Neighbourhood Plan seeks a landscape and green infrastructure led approach to future development and encourages developers to seek to achieve a Building with Nature accreditation.

Figure 7: Green Infrastructure Diagram: Assets and Priorities



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Introduction

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Stroud District Local Plan Review (Presubmission Draft Plan 2021)

Applying the guidance set out in the NPPF it is contended that the Pre-submission Draft Plan is unsound as it is not justified for the following reasons:

Evidence Base

The Regulation 18 Draft Plan for Consultation (November 2019) was prepared based on a strategy which seeks to meet objectively assessed requirements including evidence for housing provision based on up to date, objectively assessed needs using the standard methodology.

The Regulation 19 Pre-Submission Draft Local Plan (May 2021) was prepared using the Government's proposed housing needs methodology set out in the 'Changes to the current planning system' Consultation Paper. This resulted in an uplift in housing numbers across the

district of 1,050 –2,400 additional homes. In the case of Site PS24 from 700 to 900 homes (a more than 25% increase)

On 1st April 2021 the Government announced that it did not propose to proceed with the specific changes to the standard method that were consulted on.

Notwithstanding the change in Government advice, Stroud District Council has retained the housing numbers based on the alternative methodology.

It is contended that this is not a sound evidence base on which to progress the Local plan as it is not based on the standard methodology.

Further, the change in methodology was not the subject of consultation other than through the Regulation 19 process.

Delivering Sustainable Development in accordance with the policies in the NPPF

The Regulation 18 Draft Plan for Consultation (November 2019) was prepared based on an opportunities/constraint assessment of the proposed allocations.

In the case of PS24 the Draft Plan for Consultation stated that the site could accommodate approximately up to 700 homes plus associated social infrastructure and landscaping.

The Regulation 19 Draft Plan reassessed the sites and concluded in respect of PS24 that the site could accommodate approximately 900 homes plus associated social infrastructure and landscaping.

This reassessment:

- does not give appropriate weight to NPPF para. 170-177 (Conserving and enhancing the natural environment);
- Requires an average housing density within the site of 30 dph, that is higher than the ambient density of the host landscape led settlement character and would be highly likely to therefore be inconsistent with policies set out in the Cam Parish Neighbourhood Development Plan and Design Code. Specifically such a density would be incapable of delivering development that is in conformity with statement 9 in the Strategic Site Allocation, namely to “achieve a layout, density and built form and character which conforms to the Cam Neighbourhood Plan Design Code”.

The assessment below and Appendix 1 of this representation provides further evidence to support this case.

Assessment of Regulation 19 Proposed Allocation

The Regulation 19 Pre-submission Draft Local Plan sets out Stroud District Council’s proposals for Strategic Site Allocation PS24. It describes how the site comprises 46 hectares of primarily agricultural land, which will be developed for approximately 900 dwellings and community uses. Stroud District Council officers have previously advised Cam Parish Council that their working

assumption is that the site has a net developable area of 29.3 hectares (ref to email to Clerk to be added by CPC). By net developable area we mean the following.

The total area of land within the site available for residential development, excluding land required for:

- major distributor roads;
- other supporting uses (e.g. primary school);
- primary areas of green infrastructure (e.g. open spaces and sports facilities identified at the outline application stage); and
- significant landscape buffers.

Cam Parish Council has not had an opportunity to review Stroud District Council's site capacity calculations. However, we note that a net developable area of 29.3 hectares represents a 64% gross to net ratio for the site. Work previously undertaken by URBED and Llewellyn Davis provided an illustration of likely gross to net ratios for different site sizes, which are included in Table 1 below.

Table 1. An illustration of gross to net ratios for different site sizes

Up to 0.4 hectares	100% gross to net ratio
Up to 0.4 - 2 hectares	75-90% gross to net ratio
Over 2 hectares	50-75% gross to net ratio

Strategic sites covering large areas of land can be subject to a wide range of constraints, which significantly reduce their gross to net ratios. It is not uncommon for strategic sites to have gross to net ratios around the lower end of the scale indicated above (i.e. 50% of gross site area). Stroud District Council's working assumption for PS24 is significantly more optimistic. Cam Parish Council notes that Stroud District Council's site assessment identifies a number of constraints that might well impact on the capacity of this site: e.g. Priority Habitat and noise from major roads. The Regulation 19 Pre-submission Draft Local Plan indicates a requirement for a significant landscape buffer around the northern and western boundaries of the site. Moreover, Policy PS24 confirms that land will be required for (among other things): a 2 form entry primary school; accessible natural green space (ANGSt); the structural landscape buffer referred to above; and SuDS infrastructure.

Policy DHC7 of the Pre-submission Draft Local Plan sets out Stroud District Council's green infrastructure requirements, which include provision for: allotments; community orchards; amenity green space; parks and recreation grounds; children's play space; youth play space; ANGSt; and playing pitches and outdoor sports facilities. The quantitative standard for these components, taken together, is 3.92 hectares per 1,000 population. A development of approximately 900 dwellings could have a population of around 2,205 people. That could result in a requirement of 8.6 hectares for the components described above. Gloucestershire County Council is likely to require a site of between 1.8 and 2 hectares for a new 2 form entry primary school. Cam Parish Council appreciates that some of the green infrastructure components identified above could be accommodated within the net developable area (e.g. children's play space). In addition, existing

off-site facilities may have sufficient capacity to meet some of the likely need for outdoor sports provision but no discussions have yet taken place. Nonetheless, the requirements above could amount to as much as 10 hectares of the site. This illustrates why it would be helpful for Cam Parish Council to have an opportunity to review and understand Stroud District Council's site capacity work. Review of that capacity work might confirm that Stroud District Council's working assumption about the likely net developable area is sound. Conversely, it might reveal that assumptions about site capacity are unrealistic, given local policy requirements.

Stroud District Council also appears to be working on the assumption that an average density of around 30 dwellings per hectare will be achievable across the 29.3 hectares. Cam Parish Council is not convinced that this will be achievable taking into account: the mix of housing required to meet local need (Policy DHC1 and Policy HC1); the overall master planning requirements (Policy PS24); and the detailed design requirements of the Cam Design Code [VT to include the date of approval/adoption of the design code].

Policy DHC1 of the Pre-submission Draft Local Plan states that permission will be granted for residential development subject to the satisfaction of detailed criteria defined for meeting housing need at settlements. These criteria are set out in Policy HC1. The Local Housing Needs Assessment (LHNA) has established the future need for housing across the District. Table 2 below includes figures from Appendix B to the LHNA (i.e. overall need for housing by size).

Table 2. Overall need for housing by size across Stroud District

Dwelling sizes	Total need (i.e. affordable and market housing)	Percentage of total (rounded)
1 bedroom	979	8%
2 bedrooms	2,710	22%
3 bedrooms	5,847	47%
4+ bedrooms	2,890	23%
Total dwellings	12,426	

When designing housing layouts, the proposed mix is a critical determinant of land take. In order to meet the requirements of Policy DHC1 and Policy HC1, detailed designs for Strategic Site Allocation PS24 will need to be predicated on housing mixes that are broadly aligned with Table 2. Such schemes will therefore be heavily skewed towards larger, family homes (i.e. 3, 4 and 4+ bedroom dwelling types). This in turn will increase their land take, relative to schemes comprising larger numbers of smaller homes (e.g. apartments, and/or smaller terraced homes).

The master planning requirements of Policy PS24 include the non-residential components described above (with their respective land takes). They also include a requirement that development proposals conform to the Cam Design Code: i.e. in terms of layout, density, built form and character. The Cam Design Code addresses housing layout and development form with reference to Neighbourhood Plan Objectives: i.e.

- green infrastructure;
- protection of AONB setting;

- views;
- locally distinctive design; and
- connections for pedestrians and cyclists.

The upshot of these objectives is that proposals will be expected to adopt a landscape-led approach to development form. That in turn has significant implications for the capacity of individual development parcels within the overall net developable area. By parcels we means smaller areas within the net developable area, which will eventually be the subjects of reserved matters applications (or full planning applications) at the detailed design stage.

In order to meet the Cam Design Code requirements, a significant percentage of each parcel will need to be given over to on-plot green infrastructure components, which will contribute towards an interconnected network across the net developable area as a whole. As a consequence, the actual developable area (i.e. excluding various types of on-parcel green infrastructure) will be significantly smaller than the 29.3 hectares envisaged by Stroud District Council. Moreover, ensuring policy compliant housing mixes will put further downward pressure on numbers. The corollary is that meeting the Cam Design Code will result in a lower average net density than Stroud District Council has assumed. Cam Parish Council considers that assuming an average net density of around 25 dwellings per hectare (or less) would be more prudent, given local policy requirements. This suggests that Stroud District Council's previous assumption about site capacity (i.e. around 700 new homes) was more robust.

Analysis of densities within existing residential developments in and around Cam lends weight to Cam Parish Council's concerns. The samples included at Appendix 1 to this note provide an indication of actual net densities in and around Cam. By net density we mean the following.

Number of dwellings per hectare across areas that include:

- local access streets;
- incidental open space (on-parcel green infrastructure);
- children's play areas;
- car parking areas (on-plot and communal); and
- private gardens.

The samples include areas with different mixes of house types; i.e. detached and semi-detached houses and bungalows, and short terraces. Net densities across the five samples selected range from 23 to 30 dwellings per hectare. It is important to note that Littlecombe, which has an average net density of 30 dwellings per hectare (across Phase 3), differs in character from the other samples. Layouts at Littlecombe are based on narrow fronted plots, with very limited building setbacks which would not conform to the Cam Neighbourhoods design codes. As a consequence, there are fewer opportunities for greening the public realm; e.g. street trees, and/or trees in front gardens. Some of Cam's 20th Century developments are also based on narrow fronted plots, but their lower densities allow for more generous setbacks. That in turn creates more opportunities for greening the public realm (albeit not always properly exploited).

It is also worth noting that some of Cam's 20th Century developments (e.g. Millbank) are based on a very limited number of dwelling types, which may not necessarily meet current expectations in terms of Nationally Described Space Standards (NDSS). The Millbank and Hopton Road example appears to achieve a higher net density, while also providing relatively generous building setbacks. However, the same net density would be much harder to achieve with a variety of modern house types that meet both local housing needs (see Table 2) and NDSS.

Cam Parish Council does not contend that the 20th Century developments illustrated in Appendix 1 are models of high-quality design. Rather, our key point is not to underestimate the challenges involved in delivering high-quality residential environments, which meet local housing needs, and are predicated on a landscape-led approach to urban design. On the face of it, 30 dwellings per hectare may appear to be a relatively gentle density. However, sustaining that as the average density across the net developable area envisaged by Stroud District Council, with policy compliant housing mixes, will make it extremely difficult to also achieve the Cam Design Code and Neighbourhood Plan design objectives. In effect, raising the Policy PS24 housing number from 700 to 900 is inconsistent with Neighbourhood Plan objectives.

Cam Parish Council recommend that the allocation policy is amended to restore the stated housing delivery capacity of the site to approximately 700 dwellings rather than the uplift to 900 which was never consulted on.

This would deliver an average net density of around 22-24 dph which was consulted and commented on at Regulation 18 stage and is founded on evidence that is considered robust.

This is considered to be a realistic and responsive basis upon which to deliver housing development that is in conformity with The Cam NDP and the Cam Design Code and compliant with PS25 Statement 9 of the proposed allocation policy.

In summary, Cam Parish Council believes none of their views or feedback has been taken into account as part of this consultation and therefore the opinions of the community have not been considered appropriately resulting in much discontent. The evidence provided by SDC responses indicated a support/object ratio not numerically representative of the community.

Appendix 1

Samples of residential density in and around Cam



Locations of the samples - shown on Figure 2 from the Cam Design Code

- 1 The Crapen.
- 2 Lambsdowne.
- 3 Marlstone Road area (also Woodview Road, Leaside Close and Nordown Close).
- 4 Littlecombe.
- 5 Millbank and Hopton Road.

24 dwellings per hectare

The Crapen

20th Century residential development, based on an irregular block layout, situated near the western edge of the settlement. Comprises detached bungalows with on and off-plot parking. Streets have generous green verges, with some semi-mature trees.



23 dwellings per hectare

Lambsdowne

Late 20th Century residential development, based on a cul-de-sac layout, situated near the southern edge of the settlement. Comprises a mix of detached houses and bungalows with on-plot parking.



26 dwellings per hectare

Marlstone Road area

Late 20th Century residential area, with through streets and culs-de-sac, situated to the south of the centre. Comprises a mix of semi-detached houses, with some short terraces. Primarily on-plot parking. Building setbacks provide sufficient space for greening the streetscene.



30 dwellings per hectare

Littlecombe

21st Century residential development, situated to the south of the parish. Comprises a mix of detached and semi-detached houses, with some short terraces in Phase 3. Primarily on-plot parking. Layouts based on narrow fronted plots, with limited building setbacks.



28 dwellings per hectare

Millbank and Hopton Road

Millbank is an infill estate from the latter part of the 20th Century, adjacent earlier linear residential development along Hopton Road, to the south-east of the centre. Millbank has a culs-de-sac layout, with primarily semi-detached houses. Parking is on-plot, with building setbacks providing space for greening the streetscene. Hopton Road has a mix of detached and semi-detached homes of different styles, set in relatively generous plots.

