

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

### **Making Places – Shaping the Future of Cam and Dursley**

Persimmon Homes Severn Valley (PHSV) supports the overall vision set out in the Local Plan Review for the future of Cam and Dursley. The Plan rightly acknowledges at paragraph 3.35 (1) that:

*“As the District’s second most significant conurbation, Cam and Dursley will continue to be a focus for the District’s strategic growth.....principally via planned expansion north of Cam...”*

PHSV also supports the identification of Cam as a Tier 1 settlement and the recognition at page 122 of the Plan that, given landscape sensitivity, *“The preferred direction for housing growth in landscape terms is to the north/north east and east of the settlement.”*

The Plan proposes two strategic allocations at Cam as follows:

- PS24 Cam North West (West of Draycott) – approximately 900 dwellings
- PS25 Cam North East Extension (East of River Cam) – approximately 180 dwellings

#### **PS24 Cam North West (West of Draycott)**

PHSV controls the majority of the PS24 Cam North West (West of Draycott) allocation and are jointly promoting the site with Robert Hitchins Limited (RHL) who control the remaining area. Of the total site area of 46 hectares, PHSV's control extends to some 39 hectares.

PHSV are at an advanced stage of preparing a hybrid planning application at PS24 for up to a total of 795 dwellings, comprising 231 dwellings in full application and the balance of up to 564 in outline application. The scheme will comprise a mix of 2, 3 and 4 bedroom dwellings, with majority consisting of 3 bedroom units, reflective of identified local needs. In line with policy, the scheme proposes 30% affordable housing.

RHL are preparing a separate application for the balance of the PS24 allocation and are expected to make separate representations in that regard. It is important to note, however, that whilst RHL and PHSV are preparing separate planning applications the parties are working collaboratively to ensure the comprehensive delivery of the entire allocation. By way of illustration, the applications are being prepared in the context of a single Environmental Statement covering the entirety of PS24. Likewise, there is a single Design and Access Statement (DAS) and Masterplan covering the entire allocation that has been jointly prepared by PHSV and RHL.

The DAS will set out the key components of the proposals which have evolved through extensive consultation with the community, Cam Parish Council, Officers at both Stroud District Council and Gloucestershire County Council as well as external stakeholders including Highways England. These are:

- Up to 1,030 new homes, which will include 30% affordable housing;
- Potential location for 2 Form Entry School, if required (see below);
- Large areas of landscape buffers formed by open space and woodland that integrates with existing green infrastructure networks;
- Attractive east-west 'green finger' links, particularly from the western boundary running north-eastwards;
- New car parking to serve the Jubilee Fields and wider community;
- A generous level of new multi-functional green infrastructure, which includes existing trees and hedgerows along with new planting and drainage features, will further enhance biodiversity of the site;
- Provision of community orchards and allotments;
- Creation of new 'snickets' to expand Cam's existing green network of routes;
- Provision of dedicated equipped play areas to include Local Equipped Areas for Play (LEAPs) and Neighbourhood Equipped Areas for Play (NEAPs); and

- Provision for a bus route and stops within the development.

As such, we believe that the proposals accord with relevant policies in the emerging Local Plan. Further, the application(s) demonstrate the soundness of the allocation and that it is available, achievable and deliverable for the development as proposed in PS24. This is demonstrated visual in the draft master plan for the allocation which is attached at the end of these representations.

Notwithstanding PHSV's overall support for PS24, we set out below a number of detailed comments on the wording of the policy. These comments in no way affect the soundness of the allocation or the Plan as a whole, rather they are intended to be helpful in clarifying the aspirations of the policy.

#### **Primary School / Education requirement**

PS24 includes the requirement for a 2 form entry primary school (incorporating early years' provision) on a 2 hectares site alongside contributions towards a secondary school and further education provision.

Whilst the PHSV component of the PS24 sites provides for land for a primary school as per policy requirements, this is intended to provide flexibility and allow the development scheme to respond to up to date evidence on education requirements. In light of the recent appeal decision at Coombe Hill (APP/G1630/W/20/3257625 – 1<sup>st</sup> June 2021) and the concerns expressed in this decision as to the robustness of the methodology behind Gloucester County Council's 'Pupil Product Ratios', there is concern that at this present time there is insufficient evidence to support the educational requirements set out within PS24.

In this regard Gloucestershire County Council has issued an Interim Statement on Pupil Product Ratios (June 2021) (**Our Appendix X**) which confirms that following the appeal a full review of its PPR will be undertaken over the next 6 months. Until such time that this review is completed and consulted upon, there remains considerable uncertainty as to whether the education requirements proposed in respect of PS24 can be justified.

#### **Development Brief/Design and Access Statement**

The policy states that *"A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner"* before going on to set out matters that must be addressed by those documents.

PHSV believes that the need for the development brief has effectively been overtaken by events. The Design and Access Statement, informed by detailed technical reports and surveys and consultation, fulfils the intended role and will be subject to approval by the Council when the application is submitted. We would respectfully ask that the policy wording is amended to reflect this position.

#### **Site Capacity**

PS24(1) sets out that the allocation will deliver *"approximately 900 dwellings, including 30% affordable dwellings..."*. Consistent with representations made on previous iterations of the Local Plan Review, PHSV have through the preparation of the planning application gleaned a

detailed understanding of the capacity of the site to a level that is not normally achieved through the Local Plan evidence gathering mechanisms.

It is appreciated that the suggested 900 dwellings represents an uplift from earlier versions of the Plan, however, and as will be demonstrated in the forthcoming planning application(s), PHSV are now confident that the allocation can deliver 1,030 new homes together with associated uses and infrastructure. This is also consistent with the assessments contained within the EIA Environmental Statement. Further, we would also suggest that the policy should avoid using the term “*approximately*”, which is vague and open to interpretation, and should instead refer to “*a minimum of...*” consistent with the Plan’s confirmation that the overall housing requirement is “at least” 12,600 new homes during the Plan period.

We believe that this level of development (1,030 dwellings) should be reflected in PS24 and that doing so would further strengthen the soundness of the Plan including through:

- According with the National Planning Policy Framework (NPPF) which states at paragraph 123 that it is “*especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site*” (our emphasis);
- Being consistent with the Plan’s overall housing requirement which is described as being “*at least*” 12,600 new homes;
- The fact that the additional capacity of the site will include affordable homes thereby assisting in meeting the acknowledged deficit of such homes as discussed elsewhere in PHSV’s representations; and
- That the additional capacity will strengthen the Council’s housing land supply position including in the event that other allocations fail to deliver as relied upon by the Plan

**Criterion 14** of PS24 requires the provision of electric vehicle charging points as part of the future development. We note, however, that there does not appear to be the same requirement in respect of PS25 “Cam North East Extension”.

We also note that Appendix C states that every new dwelling with an associated parking space must provide a charging point.

Whilst PHSV supports the principle of facilitating the provision of electric vehicle charging points within new residential development, it is important to understand that, at this time, technology is advancing rapidly and is likely to change substantially during the lifetime of the new Local Plan. On this basis, PHSV would suggest ensuring that the necessary infrastructure (for example in terms of ducting) is in place to allow the consumer to make the choice as to what connections are fitted in the future.

Likewise, the provision of electric charging points must be also subject to other considerations including the availability of infrastructure and viability which may be outside of a developer’s control and these factors should be recognised in the policy and local standards. It is also important that the new policy does not set an unrealistic aspiration especially given that the Government consultation on amending Building Regulations has not yet concluded.

### **PS24 Map**

The policies map of PS24 includes the requirement for Strategic Landscaping including green infrastructure and is visualised on the north and west boundary. Whilst PHSV acknowledge this will be provided, the size and extent of this green infrastructure will be properly informed by technical reports support the planning application.

Although the Map states that the strategic landscaping shown is indicative, there is nevertheless concern that its portrayal could create a misleading impression of what is actually required. Given that the provision of strategic landscaping forms a policy requirement, we would ask that this be removed or presented differently possibly in line with that shown on the application master plan (our Appendix 1).

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Consistent with matters raised at section 5 (above) we respectfully ask the Local Planning Authority to amend policy PS24 to:

1. Reflect the true capacity of the site as being 1,030 dwellings;
2. Remove reference to the requirement for a development brief, incorporating an indicative masterplan to reflect the current position in respect of the imminent planning application;
3. To reflect the significant uncertainty as to whether provision of a new primary school is required as part of this development;
4. To remove the requirement for every new dwelling with an associated parking space to provide a charging point but instead refer to the provision of necessary infrastructure to a property so that such points can be fitted in the future subject to the technology that exists at the time and the consumers preference; and
5. Amend PS24 Map to more appropriate reflect the likely nature of the Strategic Landscaping including green infrastructure including on the north and west boundary of PS24.

In our view, such changes will add clarity and robustness to PS24 and the Plan as a whole.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Persimmon Homes Severn Valley are jointly promoting the PS24 allocation and have reached an advanced stage in the preparation of a planning application on the site and which is likely to be submitted imminently.

PHSV therefore have detailed knowledge of the deliverability, suitability and achievability of the PS24 allocation and are well placed to assist the appointed Inspector.

Likewise, PHSV wish to assist the Inspector in his/her consideration of the concerns set out in this representation which, again, are based on the detailed understanding of the site.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

A rectangular box containing a solid black redaction, obscuring the signature of the representative.

Date:

21/07/21



the environmental  
dimension partnership

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date **08 MARCH 2021**  
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