

EXAMINATION OF THE STROUD LOCAL PLAN REVIEW

Submission By: Mr. S.E Willetts, [REDACTED]

Matter 6d - Cam and Dursley Site Allocation

Paragraph 31 PS24 CAM NORTH WEST

Cam has very low employment opportunities and the vision for employment growth dictated in the 2015 local plan has not progressed as envisaged. The loss of Coaley junction as an employment allocation to housing, as well as a reduction in retail spaces in Cam High Street due to change of use in commercial properties has impacted upon the sustainability of our village. Matter 4 paragraph 3 question is particularly relevant with actual evidence locally confirming that the employment provision schedule is not being met even before this proposed allocation.

A large investment would be required to improve these connections prior to accepting more development. Possible village centre amenity provision was a lost opportunity due to more houses being build 'behind the CPC offices'. The density on the allocation has also been increased between the original 2019 submission and now without consultation and yet the minimal supporting infrastructure has not been increased.

Questions:

- Why is it believed that this site is sustainable given infrastructure provision for box road (Millfields) has yet to be delivered and no retail provision provided?
- Why will this not just be a dormitory for access to Bristol, Gloucester etc rather than being a part of Cam Village?
- What analysis has been done to determine why local employment provision is lacking and not being taken up then a response developed?
- How does this meet Net Zero 2030 policies?
- What analysis has been done to examine the impact of Box Road and how is that used to expand the conclusions across to this new site?

Response: The inspector should require grocery store and other retail space to be provided as a part of this allocation, employment provision prioritised and infrastructure and connectivity should be costed for and timed before this development.

Paragraph 32 PS25 CAM NORTH EAST EXTENSION

The development of this land (land East of River Cam as it was originally described) does not support the concept of developing strategies to avoid, reduce and mitigate the indirect impacts of development on the nature environment. The land currently managed as a wetland and conservation area for example known as 'Rackleaze' and the species of animals and plants that are noted there would be very affected by a new development beyond.

Landscape Sensitivity Assessment (EB36 and EB36a) says in relation to sensitivity to housing use '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 Uphorpe, 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'

It is self evident and obvious to anyone that this land is integral to the landscape setting of Cam, that

it is very sensitive to development and that any development would impact more widely. Matter 1 Compliance Issue 1.1 is particularly relevant to this allocation and all questions regarding the sustainability appraisal, considering reasonable alternatives, account of AONB. Overwhelming evidence to support the use of this sensitive site must be provided. HRA is particularly relevant to this whole area and to Rackleaze.

Unlike for PS24 there is very little about protecting the landscape yet this is far more sensitive. Is this now called an extension rather than land East of the river to try to suggest it is not sensitive? Matter 1 Consultation is very relevant here given that this proposed allocation appeared after the Cam Neighbourhood Plan was made, referendum approved and accepted by SDC yet this sensitive proposal was not subject to consultation.

It seems very odd that for this very sensitive development there seems to be much less said about that compared to PS24 and much more said about contributions from a smaller site. It is telling that a recent screening request 2022/0369/EIAS for PS25 proposed 315 houses presumably because the current proposal is seen as unviable. It is even more telling that CPC submission was again ignored in reaching the conclusion that no EIA was required because "It is the Local Planning Authority's opinion that taking into consideration the nature of the proposal, its location and potential impact, no significant effects would occur so as to warrant the submission of an Environmental Statement"

Questions:

- Why has the Cam Parish Council response to date been totally ignored and the above plus much more that has been raised not been addressed?
- Where is the evidence that other sites have been dismissed in preference to this allocation or that it has been decided that this allocation is 'the least worst' of the possibilities?
- Where is the evidence that the impact of this development is worth the benefit?
- Why against overwhelming evidence and objection did SDC decide no EIA was required for a proposal on PS25 that put more houses and expanded the area?
- Where is the evidence that proper consultation on this sensitive additional allocation has been carried out or where is the evidence to explain why consultation is not necessary?

Response: The inspector should require PS25 to be removed and IF the housing numbers need to be found elsewhere then alternatives with less impact should be explored.

Notwithstanding the above the following are relevant:

Matter 3 Housing Need and Requirement:

The government has removed housing targets. The standard methodology formula must be updated to take into account the Governments updated affordability ratio figures on an annual basis. Anecdotal (but reliable) evidence from Estate Agents suggests that many people are moving into the Box Road development at Cam from Bristol which is impacting the availability of homes to meet unmet needs in Stroud District and indeed Gloucestershire.

How is SDC updating the housing need requirement in light of the above and how is SDC monitoring the sale of homes to determine if local need is being met as per policies?

Matter 10 Environment:

PS24 and 25 are schedule2 developments as confirmed by SDC. However EIA Regulations 2012 amended 2015 state quite clearly that EIAS should be carried out as per schedule 10b. This has not

been done. This should be done inclusive of existing and continuing Box Road development in Cam as this in total forms a connected ribbon development and guidelines clearly state that this should not be left piecemeal application by application but should be done as early as possible.

Questions: Why is it considered that this EIAS should not be carried out holistically at this stage? Why is it considered that should be done at a later stage for actual applications, individually, piecemeal when the possibility of better more effective holistic and strategic responses and mitigations will (likely to) be impossible.

Response: The inspector should require this work to be done at this stage.

PPG25 Planning Policy Statement 25 Practice Guide 'Taking Flood Risk Into Account In The Planning Process' calls for a hydrographic model and impact assessment both upstream and downstream. Importantly this should consider existing and evolving development and control structures i.e. upstream at Lister's Estate Dursley and downstream at BOX road Cam. It also states that this should be done as early as possible.

Site selection methodology paragraphs 28 and 29 asks questions particularly relevant and given that PPG25 has not been followed the answers will be seriously lacking.

Questions: Why is this statutory requirement not be carried out at this stage? Why is only a desk study whose basis is 3 years or more out of date being used?. Why is it considered that it should be done at a later stage for actual applications, individually, piecemeal when the possibility of better more effective holistic and strategic responses and mitigations will (likely to) be impossible.

Response: The inspector should require this work to be done at this stage.