

**REPRESENTATIONS TO THE STROUD LOCAL PLAN  
REVIEW – DRAFT PLAN FOR CONSULTATION**

**ON BEHALF OF CLIFTON HOMES**

**LAND AT TAIT'S HILL ROAD, CAM**

**January 2020**

**ON BEHALF OF CLIFTON HOMES LTD**

**REPRESENTATIONS TO THE STROUD LOCAL PLAN REVIEW – DRAFT PLAN  
CONSULTATION**

**LAND AT TAIT'S HILL ROAD, CAM**

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## 1.0 **INTRODUCTION**

- 1.1 On behalf of Clifton Homes Ltd, Grass Roots Planning have been instructed to prepare and lodge representations to the Stroud Local Plan Review – Draft Plan Consultation, in respect to land at Tait's Hill Road, Cam (the site).
- 1.2 Clifton Homes have recently become involved with the site and would like to promote it for allocation in the new Stroud Local Plan. A site location plan is provided in Appendix A and we anticipate that the site could deliver a sensitive development of circa 60 homes.
- 1.3 We understand that CBRE Ltd previously submitted the site within the 'Call for Sites' in January 2019; to confirm we are now the lead agents for this site and would request that all future correspondence be directed to us.
- 1.4 We advocate that there are significant benefits from allocating this land for development which will contribute to the sustainable growth of Cam. Furthermore, allocating a diverse portfolio of sites ranging in scale will help the Council maintain its five-year housing land supply (5YHLS) over the coming years.
- 1.5 Our representations provide our overall thoughts and concerns on the progression of the Local Plan Review to date, including housing need and the distribution of development. Lastly, we provide further detail on the work undertaken to date to bring forward land at Tait's Hill Road, Cam for residential development.

2.0 **THE NEED FOR HOUSING**

2.1 The NPPF was revised in July 2018 and in 2019 and this included the introduction of the Standard Methodology for Calculating Housing Need ('the standard method'). The method seeks to use a formula to identify the minimum number of homes expected to be planned for based on historic undersupply and affordability ratios. It is important to note that whilst this produces a minimum annual housing need figure, it does not produce an overall housing requirement.

2.2 We are pleased to note that Stroud District Council (SDC) are utilising the standard method to calculate their housing need and are not seeking to justify a different methodology. This is set out in Chapter 2.5 of the draft plan which estimates an overall minimum local housing need of 12,768 dwellings over the plan period.

2.3 Based on up-to-date household projections (2020 – 2030) and affordability ratios, in our view the plan needs to be made clearer that the uncapped need for housing is as follows:

Houshold Need over 10 year period (current year + 10 years)	Affordability Ratio 2019	Adjustment Factor	Plus 1	Annual Average Housing Growth	Minimum Annual Local Housing Need	Overall Minimum Local Housing Need for 10 year period	Overall Minimum Local Housing Need for 20 year period
4,913	9.01	0.313125	1.313125	491.3	645.1383125	6,451	12,903
<b>PER ANNUM</b>							645

Figure 1. Updated Housing Requirement based on up-to-date household need (2020 – 2030) and affordability ratios

2.4 This is then capped at 40% above the current adopted Local Plan Requirement, which amounts to 638 homes per annum (12,768 over the plan period), because the plan was adopted within the last five years. However, should the plan not be submitted for examination by November 2020, the cap no longer applies and SDC will need to plan for the unconstrained growth.

2.5 We are pleased to see that a contingency has been planned for in the Local Plan and consider this is the best way of meeting housing need over the plan period.

### 3.0 **DISTRIBUTION OF DEVELOPMENT**

- 3.1 Whilst we agree with the overall distribution of development (namely focusing development on the main towns of Cam, Dursley, Stonehouse & Stroud, and two new settlements at Sharpness & Wisloe), we are concerned over the portfolio of sites selected including the balance between smaller and strategic-scale sites.
- 3.2 In particular, we note in Cam that the three allocations proposed in this location are for 15, 180 and 700 dwellings. We advocate that a broader range of sites should be selected for allocation to ensure that the supply of housing can continue to be delivered in the shorter term to maintain a 5YHLS (sites of circa 20 – 100 dwellings).
- 3.3 A broader range of sites allows for choice, competition, and flexibility in the market, as advocated by the NPPF – such as land at Tait's Hill Road, Cam, which we consider to be a suitable location for development.

## 4.0 **LAND AT TAITTS HILL ROAD, CAM**

4.1 As set out within the introduction, we consider the land north of Taitts Hill Road, Cam, should be allocated for development in the Local Plan Review. This would help SDC diversify the portfolio of sites in terms of scale, creating a better balance between smaller and strategic-scale sites, which will help to maintain a 5YHLS. We consider that the site is a sustainable location for development for the following reasons. A site location plan is provided in Appendix A.

### **Access to Transport**

4.2 On Taitts Hill Road are two bus stops with two services – numbers 62 and X1. These carry services into the centre of Cam, Bristol, Berkeley, Newtown, and Dursley. The 62 runs every two hours Mondays to Saturdays (Stagecoach Service), and the X1 is a school service which runs Monday to Friday to Rednock School, Sharpness Primary School, and Square School.

4.3 On Dursley Road (a circa 8 minute walk), there are further services which includes the 65 and X11. The 65 goes to Woodfield / Draycott and runs every two hours.

4.4 There are therefore reasonable public transport options available meaning the use of the private car can be reduced.

### **Access to Facilities**

4.5 The site is in close proximity to Dursley Rugby Club, Stinchcombe Cricket Club, Stinchcombe Village Hall, Quarry Chapel URC Church, the One Stop store on Phillimore Road, and allotments at Woodfield Road. These facilities all lie within circa 1km of the site (approximately a 10 – 12 minute walk), which complies with the Manual for Streets appropriate walking times / distances.

### **Planning Status**

4.6 The site is not subject to any specific planning constraints, such as a Flood Zone, Conservation Area, National Park, SAC, or SSSI. The boundaries of the AONB lie to the south of Taitts Hill Road.

## **Planning History**

- 4.7 There has been no previous planning applications for the site.

## **Assessment undertaken by SDC**

- 4.8 As part of the 'Emerging Strategy' consultation undertaken between November 2018 – January 2019, CBRE Ltd, the landowners' agent, submitted the site for assessment in the Strategic Assessment of Land Availability (SALA).

- 4.9 Stroud District Council have now assessed the site and have rejected it for the following reasons:

*'The site is not suitable for development because of the likely high landscape impact; housing development would significantly extend the main settlement westwards, but would feel divorced from it due to the steep valley slopes, and would be further detrimental to the function of the area as a green / wildlife corridor. Employment development would appear incongruous and prominent and would be isolated from the main commercial areas. There are therefore potential impacts preventing sustainable development in this location'.*

- 4.10 Accordingly, Tyler Grange were instructed to assess the site in respect of potential landscape impact, and have prepared an initial landscape advice plan in response, which can be found in Appendix B. An extract of this advice is provided below.





Figure 2. Extract of Tyler Grange’s initial landscape advice (full advice provided in Appendix B)

- 4.11 Firstly, it should be noted that the site has existing residential development to both the east and west. Development in this location, fronting onto the main road, would infill the gap along this road and link the two parcels of existing residential development.
  
- 4.12 As can be seen in Tyler Grange’s note, they advise that development should be kept to the lower levels of the site in closer proximity to the road, whilst retaining an open wildlife / habitat buffer along the eastern slope of the site. This would allow for an improved habitat corridor to be provided which would also be open to the public for recreational use, if so desired. Accordingly, we consider that through suitable urban design and masterplanning, which responds to the character of the landscape, the concerns raised by the Council can be overcome. This could also be put forward via suitable policy wording to ensure that no development occurs on the eastern slope and that this must be retained for an enhanced wildlife / habitat corridor.
  
- 4.13 We would anticipate a more sensitive level of development to be delivered here on the flatter circa 2.5 ha of the site (circa 60 dwellings) at a density of less than 30 DPH, to allow suitable landscape buffers to be provided.

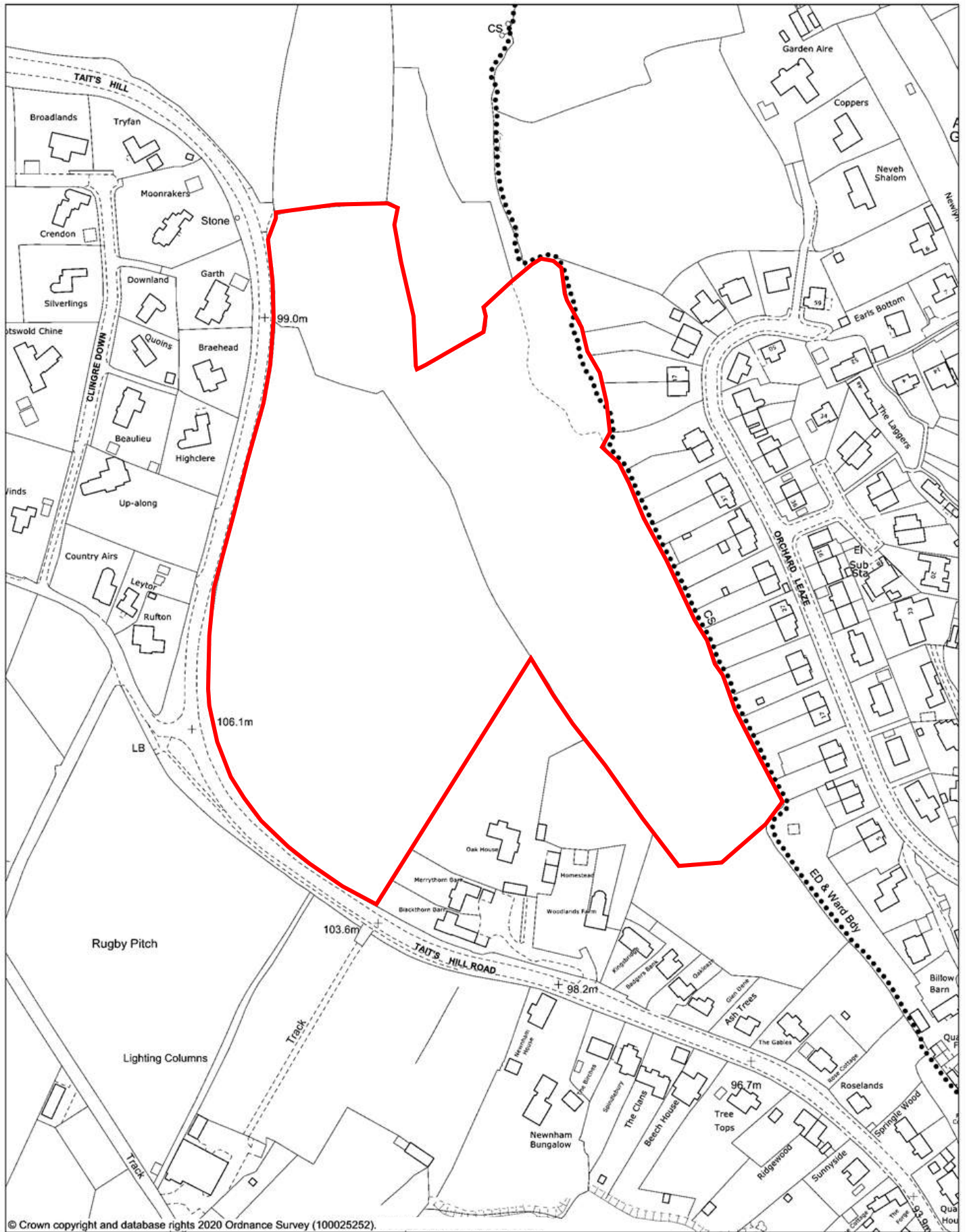
4.14 Accordingly, we would request that SDC re-consider the site for development in light of the technical advice prepared and consider allocating the site within the Local Plan Review.

## 5.0 **CONCLUSIONS**

- 5.1 In summary, we consider that the portfolio of sites set out in the Stroud Local Plan Review weighs too heavily in favour of strategic-scale sites which are known for long lead-in times and require significant infrastructure requirements. Accordingly, a balance needs to be struck between smaller and larger-scale sites, which requires smaller sites (20 – 100 dwellings) to be allocated in the plan, such as land at Tait's Hill Road, Cam. This will ensure that SDC maintains a 5YHLS throughout the plan period.
- 5.2 We have considered the issue of landscape impact and initial advice from Tyler Grange indicates that a sensitive level of development can be achieved on the site (circa 60 dwellings) without harming the setting of the AONB to the south, and allow the wildlife corridor on the eastern slope to the valley to be retained and enhanced.
- 5.3 The site lies in a sustainable location and is not subject to any specific environmental designations which would preclude development. Consequently, the site should be allocated within the next edition of the Stroud Local Plan Review for up to 60 dwellings, enhanced wildlife corridor, landscaping, and public open space. Should officers wish to discuss this site in any way, we would be happy to arrange a meeting.

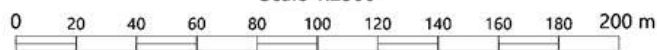
**APPENDIX A**  
**SITE LOCATION PLAN**





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Scale 1:2500



Projection: British National Grid

Land at Tait's Hill Road, Cam  
 Ref: 508/A4/001  
 Site Location Plan

**APPENDIX B**  
**INITIAL LANDSCAPE ADVICE PREPARED BY TYLER GRANGE**



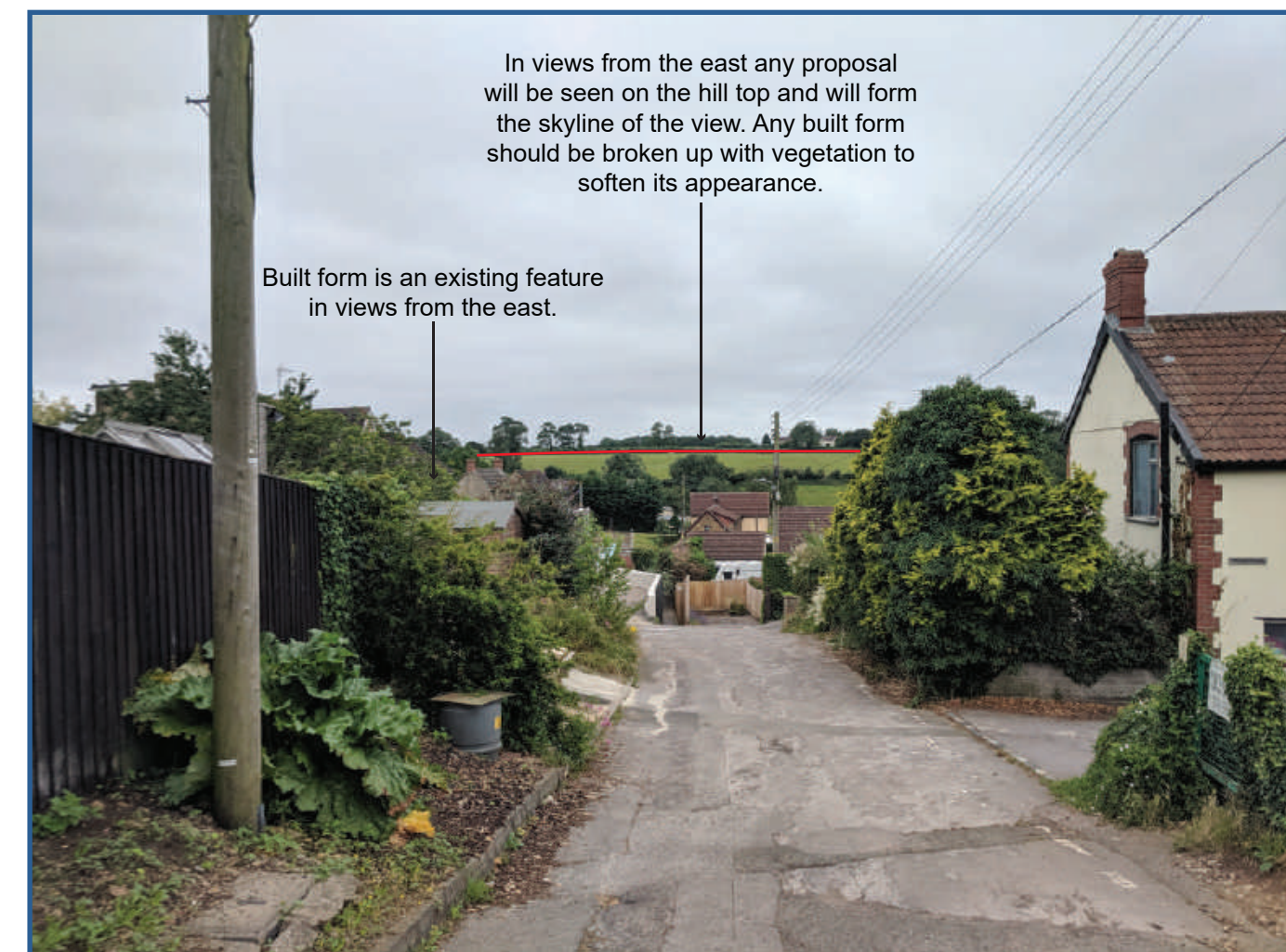


- Site Boundary
- Contours
- Cotswolds AONB
- Cam Settlement Boundary as Identified by Stroud District Council

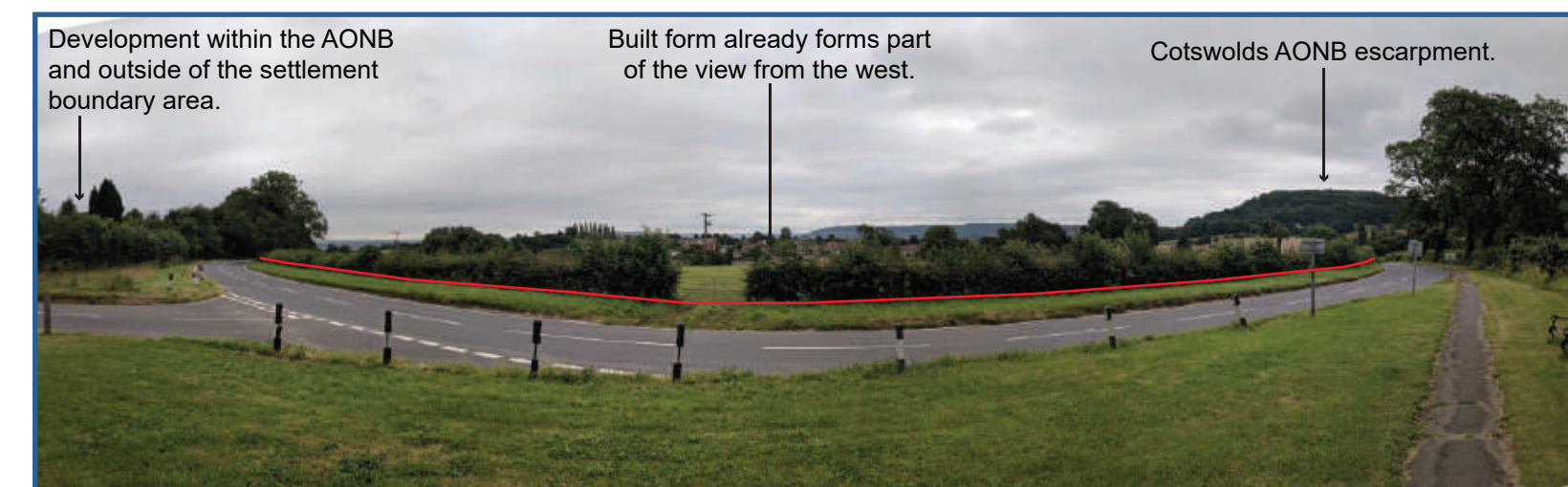
**Local Precedent:**

Planning application - S.14/0966/OUT and subsequent planning appeal - APP/C1625/W/15/3007972. Outcome: Application refused and appeal dismissed.

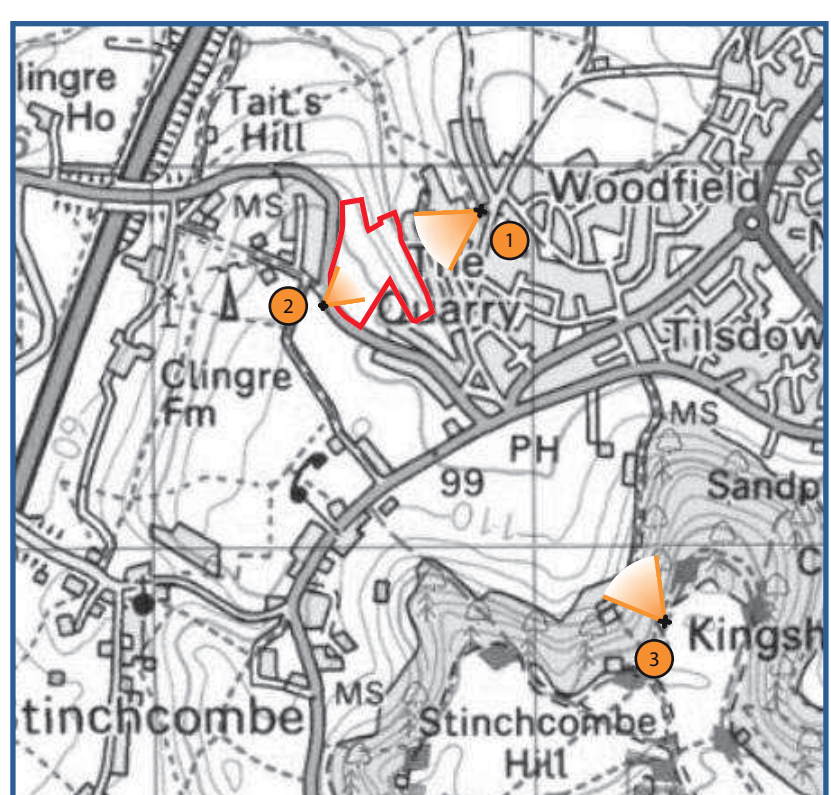
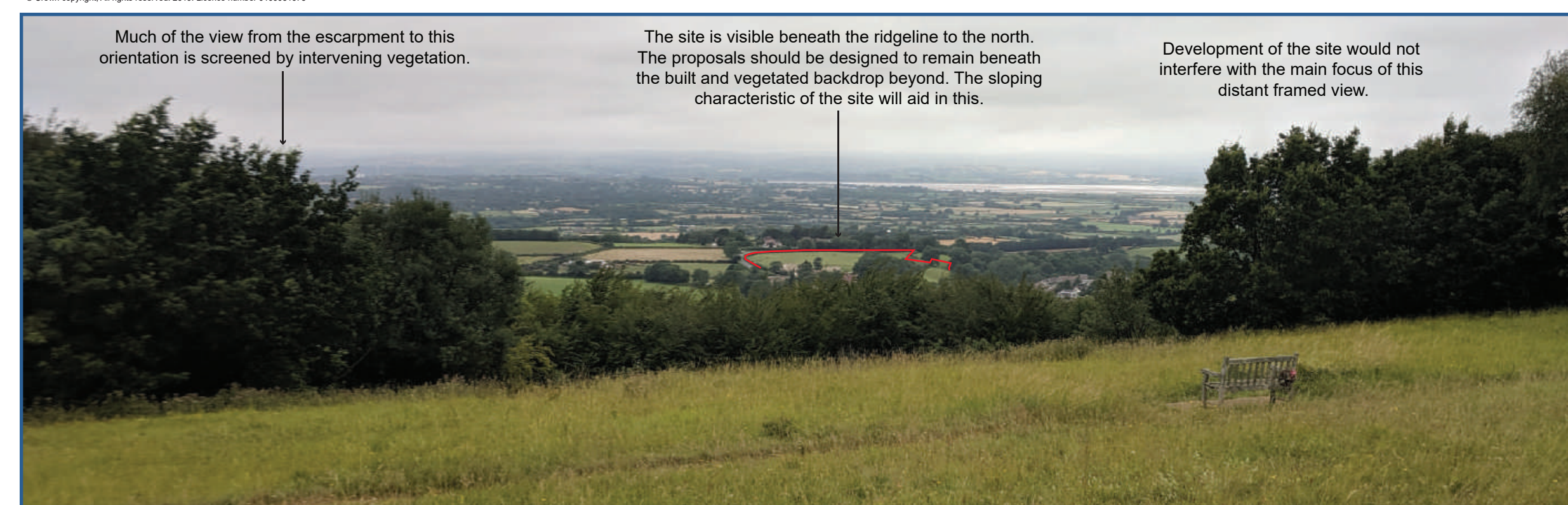
- Application for upto 100 dwellings on land off Shakespeare Road, Dursley.
- Site not within the Cotswold AONB but on the boundary and within the setting of the AONB.
- Cotswolds AONB Board does not lodge an objection regarding the setting of the AONB.
- Inspector cites in his dismissal that *'the proposals would detract from the open qualities of the landscape and reduce views to the countryside and AONB beyond the site'*.
- Any application will need to consider the findings of this application and appeal.



**Photoviewpoint 1:** Taken from Westend to the east of the site.



**Photoviewpoint 2:** Taken from the footpath adjacent to Tait's Hill Road, west of the site and within the AONB.



Project	Tait's Hill, Cam
Drawing Title	Landscape and Visual Initial Advice Plan
Scale	Not to Scale
Drawing No.	12555/P01
Date	July 2019
Checked	



**Photoviewpoint 3:** Taken from the Cotswolds Escarpment at Public Right of Way, CAM BRIDLEWAY 125. South east of the site and within the Cotswolds AONB.