

Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

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.

Policy PS24 Cam North West

Pegasus supports the identification of Cam as a Tier 1 settlement in the Pre-Submission Plan. It is a sustainable and suitable Tier 1 settlement as set out in our comments on the Cam and Dursley cluster.

Pegasus support the proposed allocation PS24 West of Draycott. The site is promoted by Robert Hitchins Ltd and Persimmon Homes and a joint submission was made at the consultation on the Local Plan in January 2019, separate submissions have also been made in response to the Draft Plan in January 2020.

At the time of preparing these representations planning applications are currently at an advanced stage for both Robert Hitchins Ltd and Persimmon Homes and are about to be Submitted. Although separate planning applications are prepared it is important to note, that 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.

Cam is identified in the Local Plan as a Tier 1 settlement and is the second largest in terms of population. Together with Dursley it has the best access to key services and facilities of anywhere in the District.

Land west of Draycott is a greenfield site and comprises approximately 46 hectares and will provide a suitable and deliverable extension to Cam. The site is located adjacent to Draycott, approximately 4km northwest of Dursley and immediately southwest of Cam & Dursley railway station. The site is bordered to the north by the railway line, to the east by the A4135, to the south and southwest by Everside Lane and to the west by the M5.

In order to support the Reg 19 consultation, the promoters/developers have submitted the Design and Access Statement that has been prepared to support the applications for the site.

The AECOM Sustainable Transport Strategy (February 2021), page 28 concludes:

- "There are opportunities to integrate the development into the existing settlement and provide access to local facilities including education, leisure, health, retail and employment on foot, by bicycle or by bus.

- The site is well placed to benefit from enhancements to bus services along the A4135 corridor and enhanced rail services at Cam & Dursley railway station.

- Proximity to Cam and Dursley railway station.

- Inclusion of a primary school within the development proposals would contribute to increasing the proportion of internalised trips.

- The site is adjacent to Draycott Business Park and Draycott Mills, a large employment area on the east side of the A4135.

- There is an existing network of public footpaths that intersect the site.

- National Cycle Route 43 routes along Moorend Lane and St John's Road to the north of the A38 through the village of Slimbridge approximately 1.5km north of the site."

The site is proposed for 900 dwellings, 2 form entry primary school, strategic landscaping and green infrastructure and associated community and open space uses. However, through the preparation of the planning applications it is evident that the site can deliver a number of dwellings above that currently proposed in the Reg 19 plan. As a result of detailed technical work the allocation can deliver 1,030 new homes together with associated uses and infrastructure, in which case an increase in the quantum of development is sought. Policy PS24 should be amended to reflect that the site can deliver 1,030 dwellings. Such an increase is in accordance with the NPPF in particular paragraph 117, making effective use of land, consistent with the Plan's overall housing requirement which is "at least" 12,600

dwellings, additional capacity of the site will include the provision of affordable homes consistent with the Plan.

The site is suitable, available and a deliverable site for development due to its location, access to services and facilities, limited physical constraints that can be brought forward for development without harm to biodiversity of heritage assets.

In respect of the wording of the Policy PS24 this is set out below in the modifications to the policy.

As addressed in response to Core Policy 6, there is evidentially no need for early years or primary school places on this allocation and as such there is no requirement for on-site provision of a primary school including early years.

In terms of contributions towards secondary and further education, there is currently no evidence that there is a need for additional places and so similarly this policy requirement is not justified.

(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.

Modifications to the wording of Policy PS24

The overall quantum of development should be increased to approximately 1,030 dwellings for the reasons set out above.

1. Development brief and indicative masterplan

The second paragraph of the Policy refers to a development brief being prepared including an indicative masterplan to be approved by the Council, the brief is intended to detail the way in which the land uses and infrastructure will be developed in a co-ordinated manner.

It is noted that this appears to be the Council's approach for the strategic sites, however, in the case of PS19a and also PS24 work on planning applications is already advanced and indicative masterplans (informed for example, by detailed landscape, heritage, ecological impact assessments and transport assessment) have been prepared and these have been subject to public consultation as part of the preparation of the planning applications. The planning applications are being prepared in parallel with the drafting of the Local Plan, so that

applications can be submitted as soon as possible. Development can then take place in order to support the delivery of housing in a timely manner in the plan period which is consistent with the overall national objective of boosting housing land supply.

An objection is therefore made to the unnecessary requirement in the policy for a development brief and indicative masterplan to be approved by the Council, this will in effect slow down delivery of housing etc. and consequently it will undermine the housing trajectory.

The following wording is suggested to replace paragraph 2 of the policy: ***“The Proposals will be required to deliver a masterplan that has been informed by detailed landscape, visual, heritage and ecological impact assessments and demonstrates an appropriate scale, layout and form.”***

2. 2 form entry primary school

As addressed in response to Core Policy CP6, our education needs assessment indicates that there is no need for early years or primary school places on this allocation and as such there is no requirement for on-site provision of a primary school including early years.

In terms of contributions towards secondary and further education, there is currently no evidence that there is a need for additional places and so similarly this policy requirement is not justified.

3. Contribution towards extension of existing health facilities at Cam

A surgery is normally commercially funded and is viable without the need for contributions.

4. Contributions to Jubilee Fields and contributions to off sites indoor sports and leisure facilities.

It suggested that it would better to combine those aspects of the policy where contributions might be required to mitigate into a single criterion worded along the lines of ***“the development will provide for necessary works and appropriate contributions to mitigate its impact on education, social and community infrastructure, and the transport network”*** If this change wot the policy was made this would obviate the need for criteria: 2, 3, 4 (part), 12, 13 (part) & 17. The supporting paragraphs to the policy could provide examples by way of illustration what mitigation might be expected in this context.

5. Structural landscaping

No comment.

6. On site and if appropriate off site mitigation against the identified impacts of development upon the Severn Estuary SAC/SPA/RAMSAR site

The wording of the policy as currently written is not considered appropriate as it implies that on site mitigation is required which would be unrealistic to deliver. We are aware in terms of

the Severn Estuary, there is already a mitigation scheme in place for developers to contribute to for impacts from development within a 7.7km impacts zone around the site. It is also understood that SDC, in co-operation with other nearby councils, is going through the same process in relation to the Cotswold Beechwoods SAC. We would therefore suggest rephrasing this criterion to read:

Consider any identified impacts in relation to the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC and to contribute to the approved SDC mitigation schemes or undertake an independent mitigation strategy as appropriate

Points 7 – 9 no further comments other than those above.

10. Layout of the site

Reference is made to “Manual for Streets”, clarification is sought whether this a reference to MHCLG/DOT publication rather than Gloucestershire County Council recently published Manual for Gloucestershire Streets. There are some issues with the preparation of the County Council version.

11. No comment.

12. Contributions and support to sustainable transport

See comments in response to 4 above.

13. Contributions to bus services.

It is not clear what the justification is for enhancing bus services.

14,15 and 16 No comments.

17. Any associated infrastructure enhancements required and identified in the Stroud IDP in this location.

This appears as a “catch all” phase. At this stage the IDP is not clear on what is required and can be justified to support the development at Cam North West. An objection is made to Criterion 17.

18. Refers to phasing arrangements to ensure that employment land is developed and occupied in parallel with housing land completions

An objection is made criterion 20 as it is unnecessary. The site is well located in respect of existing and proposed employment opportunities/land in the vicinity and to link housing completions to the bringing forward of a specific employment site unnecessarily risks housing delivery

(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:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

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:

Date:

20.07.2021