

Consultation response form PART B:

If you have several different comments to make, you may wish to use a separate PART B sheet for each one (although you do not have to). If you use multiple PART B sheets, please make sure you fill in your name on each of them (you only have to fill out PART A once, as long as it is clearly attached to your PART B sheets when you submit the forms to us).

Your name

Your organisation or company

Your client's name/organisation
(if applicable)

The consultation is seeking views about whether the big issues identified within this paper are the right things to focus on and what options exist for tackling them. Are there other issues, options or opportunities that have been missed? **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (download a copy of the sites form at www.stroud.gov.uk/localplanreview).**

We ask a series of questions (highlighted in pink boxes) throughout the consultation paper. Each of the questions is numbered. Please can you reference the question number(s) and/or the topic here:

Question number: 2.3b

Please use this box to set out your comments:

(Attach additional sheets of paper or expand this box if you need to)

Question 2.3b asks the question whether local housing needs surveys should be used to influence open market housing mix. The main problem with a housing needs survey is that it is simply a snapshot at any particular point and is unlikely to remain valid over a period of time.

Those people surveyed will have certain housing needs at a point in time but it does not mean they will have those same needs in the future. Furthermore, if people move out of the survey area their needs may be different to those residents who have replaced them.

Unless the housing needs survey is updated annually it is not appropriate to use it to inform housing mix. Our experience is that in fact housing needs surveys are often not updated for a number of years and their relevance diminishes the older they are. It would therefore be inappropriate to use out-of-date survey information as a way to advise on housing mix.

We therefore do not consider a housing needs survey is an appropriate mechanism for influencing the mix of open market housing.

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Richborough Estates

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Question number: 3.4

Please use this box to set out your comments:

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We agree that the Tier 1 settlements of Cam & Dursley, Stonehouse and Stroud (as currently identified in the Council's Settlement Hierarchy) should remain as Tier 1 locations for new development. They are clearly the locations which have the largest number of employment opportunities, services and facilities. As such, new development in these locations will be well placed to deliver sustainable development.

However, it is recognised that there are some environmental constraints (in some cases significant) within the District and this is acknowledged in the Issues and Options paper where reference is made to the landscape constraints around Stroud. Our view is that not all of the Tier 1 settlements need to accommodate the same levels of growth and, for example, Cam (and to a certain extent Dursley) could receive more new development than Stroud because it is far less constrained by the AONB. Such an approach would not affect the principles of a hierarchy which has the largest (and currently the most sustainable) settlements at the top.

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[REDACTED]

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Question number: 3.6

Please use this box to set out your comments:

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CAM & DURSLEY (BROAD LOCATIONS AND POTENTIAL SITES)

CAM:

We wish to comment on the broad locations for future growth identified around Cam; and we support, for new residential development, the northern section of CAM B (West of Draycott) situated between the M5, the Gloucester-Bristol railway line, the A4135 and site CAM013 – a location plan is appended to this representation.

Richborough Estates is a strategic land promotion business with over 14 years' experience of delivering new housing for local communities. We are a strong advocate of the plan-led system and support the Housing White Paper's clear focus on speeding up plan-led housing delivery. We promote a diverse range of sites from 50 to 1,000 dwellings, supporting both open market and affordable housing. We are currently actively promoting 20,000 dwellings across more than 70 sites through the development plan system.

The land West of A4135 within CAM B (the 'site') is circa 16.15ha and has the potential to provide in the region of 300 dwellings. Its eastern and north boundaries comprise of the A4135 and railway line respectively, with part of its western boundary adjoining the M5 motorway and the remaining boundaries comprising of existing field boundaries.

We are aware of a previous refusal on part of the site for 88 dwellings and the reasons why the application was refused have been taken into account in our assessment. With this in mind, our initial technical work to date has not identified any issue that would prevent the site coming forward for development, either as part of a holistic approach to CAM B or as a standalone site. In summary:



LOCATIONAL SUSTAINABILITY

As the Issues and Options document explains, Cam is identified as an Accessible Local Service Centre in the adopted Local Plan and the settlement has a very strong retail role. The Council's 'Settlement Role and Function Study' illustrates the fact that Cam has a large number of employment opportunities.

The site is around 1.6km (1.0 miles) from various facilities including a Tesco superstore. Slimbridge Primary school is some 1.3km from the site, with Cam Woodford Junior School and Cam Hopton C of E Primary School located 2.3km and 2.5km from the centre of the site respectively.

There is also a significant range of services and facilities in neighbouring Dursley but it does have some AONB constraint. The two settlements are physically connected and the adopted Local Plan essentially treats them as the same settlement for the purposes of the Settlement Hierarchy; and continuing this approach is a sensible way in taking forward the emerging Plan as well.

SITE ACCESS STRATEGY

As noted, the A4135 runs along the eastern frontage of the site. The road is subject to a 50mph speed limit for the majority of the frontage before changing to 40mph for the southern extent of the site. There is a footway located on the eastern side of the road, which provides a link towards the centre of Lower Cam.

There are two potential vehicular access options. The first option is along the north section of the eastern frontage utilising a ghost island right turn. The second option is further south along the frontage towards Box Road where the A4135 becomes 40mph. If both options are utilised it may be that both are constructed as priority junctions rather than the northern one being a ghost island. This would be the subject of discussions with the Highway Authority.

In respect of pedestrian access, it is proposed that a pedestrian crossing facility would be constructed to link to the existing footway on the eastern side of the A4135 carriageway.

There are three public rights of way within in the site (CAM Footpaths 24, 25 and 29), all of which can be incorporated into a residential layout. There are no bridleways within the site.

The site can therefore achieve a suitable vehicle and pedestrian access. Our solution for the site differs from that proposed by the refused application.

NON-CAR MODES OF TRAVEL

Bus stops are located on the A4135, along the site frontage. A number of buses serve these stops including the 60/62 which runs hourly between Gloucester and Dursley and the 61 which provides an hourly service between Cheltenham and Woodmancote. A number of other services also run once a day to destinations such as Gossington, Kingswood and Whitminster.

Cam and Dursley Rail Station is located approximately 1.1km from the centre of the site and is accessible via existing footways on the eastern side of the A4135 and the north-western side of Box Road. Great Western Railways operate an hourly train service between Bristol Temple Meads and Gloucester.

Overall, the site offers a range of genuine sustainable travel choices which could be taken up by potential residents to access employment, education and leisure uses.

LANDSCAPE

The site lies outside of the AONB. It's northern and north-western boundaries are influenced by the railway and



M5, together with their associated infrastructure. The A4135 frontage is well contained by planting and there are a limited number of mature trees within the site, thus they can be incorporated into a residential layout. The existing hedgerows also provide a framework within which a high quality residential layout can be designed.

The fact that the site is not within the AONB is an important factor when one considers the number of locations constrained by the AONB within the District. Having a non-AONB site in a Tier 1 settlement provides the Council with a significant opportunity to deliver new housing. Furthermore the Council's evidence base shows that Cam has a fairly high proportion of retirees and the introduction of new family housing would make an important contribution to attracting younger residents to the settlement.

FLOOD RISK

The site lies within Flood Zone 1 and is therefore at low probability of river flooding.

ANCIENT WOODLAND

There is no ancient woodland within or adjacent to the site.

NATIONAL & LOCAL NATURE RESERVES

There are no national or local nature reserves within or adjacent to the site.

SSSI

There is no SSSI within or adjacent to the site.

SAC

The site is not a SAC, nor is it adjacent to one.

HERITAGE

There are no listed buildings within or adjacent to the site. The site is not within or adjoining a conservation area. The site is not a scheduled monument nor park and garden; neither is it adjacent to either type of designation.

GROUND CONDITIONS

There is nothing to indicate that there are any contamination or land stability issues that prevent development taking place.

SUMMARY

We support the identification of the attached site as part of CAM B broad location. There are no physical constraints to it coming forward for residential development and whilst part of the site was previously the subject of a refused planning application, our technical work shows that the matters which arose with that application can be overcome with different solutions. It would appear that the Council also think that to be the case because the site is included within CAM B.

Cam is a Tier 1 settlement and our view is that it should remain so in the emerging Plan. The site is unconstrained by landscape, ecological or heritage asset designations, and it is within Flood Zone 1.

Paragraph 152 of the NPPF says "Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.



Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued”.

Stroud District has a number of designation constraints but this site can deliver the sustainable development envisaged by the Framework through avoiding the type of significant adverse impacts that other potential development sites may have.

In conclusion we consider that the site should be taken forward in the emerging Local Plan as a residential allocation.



M5

M5

M5

M5

M5

M5

M5

M5

A4135

A4135

A4135

A4135

A4135

Box Rd Ave

Box Rd

Box Rd

Box Rd