

**EXAMINATION OF THE STROUD DISTRICT LOCAL
PLAN REVIEW**

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

MATTER 6d:

Cam and Dursley site allocations

On behalf of: Robert Hitchins Ltd

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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 6d, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
 - Matter 7a
 - Matter 7b
 - Matter 7c
- Matter 8
- Matter 10
 - Matter 10a
 - Matter 10c
 - Matter 10d
- Matter 11
 - Matter 11a
 - Matter 11b
 - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



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6. SITE ALLOCATIONS – GENERAL QUESTIONS

6.1 Matter 6d Cam and Dursley site allocations

Strategic Site Allocation Policy PS24 Cam North West

31. The site is identified as a sustainable urban extension to Cam and is allocated for strategic housing development, to include approximately 900 dwellings and community uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 18 listed requirements.

- a. Paragraph 3.3.6 of the Plan states that the development will include ‘residential and community uses that meet the day to day needs of its residents’. Whilst the policy seeks educational and healthcare provision or contributions, there appears to be no provision for employment and retail uses which are generally necessary to meet day to day needs. Is this because such facilities are within close proximity and if so, what are the walking distances to such facilities from within the site?

31.1 The Local Plan identifies Cam as one of a number of district settlements that are to be the primary focus site growth and development in Stroud District because of its excellent transportation infrastructure and role as a jobs and service centre. Cam is a Tier 1 settlement and the Plan’s strategy is to concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud (Policy CP3). Cam is a very large settlement and has the second largest population after Stroud. Page 122 of the Plan (CD1) states that *“Cam has a strong local retail role ‘neighbourhood’ shopping areas and a range of local shops in the main village centre, which serves the day-to-day needs of surrounding villages and hamlets.”*

“Cam and Dursley have the best access to key services and facilities of anywhere in the District. Cam has a very significant employment role, but it is nevertheless a net exporter of workers: it acts as a major ‘dormitory’ and a local service centre.”

31.2 A planning application was submitted and validated in August 2021, this included a Design and Access Statement which in section 2.3 sets out the local connectivity and existing facilities. The centre of Cam is also identified as a District Centre in the draft Local Plan and regarded as a sustainable settlement appropriate for growth. The centre of Cam is located at the intersection of High Street, Chapel Street and Cam Pitch within a 10- 15 minute walk of the site (measured from the edge of the site) and is well served by local bus services.

31.3 The community facilities and services on offer are shown in Figure 10 of the DAS and include:

- Several local shopping areas (centre of Cam, Phillimore Road, and Kingshill Road (Dursley));
- 2 no. Primary schools (Cam Everlands Primary School, Cam Hopton Church of England Primary School);
- Junior and Infants School (Cam Woodfield Infant and Junior School);



- Rednock Secondary School (Dursley);
- 2 no. Medical Centres (Orchard Medical Centre, Vale Community Hospital (Dursley));
- 4 no. Community Halls/Hubs (Arthur S. Winterbotham Memorial Hall, GL11 Community Hub, Woodfield Community Centre, Ashmead Village Hall);
- Post Office;
- Various churches (Quarry Chapel, St. Bartholomew's Church, One Church, Cam Methodist Church, St. George's Church (Dursley), 3C Community Church (Dursley));

And

- Various eateries including 2 no. public houses, restaurants/take-aways and cafe/ coffee shops.

31.4 Most of the local facilities in Cam are situated within 1.2km of the site, or a 15 minute walk (measured from the edge of the site). There are several existing bus stops within close proximity to the site (between 50-200m) along the A4135 and Manor Avenue which can be easily reached on foot and provide public transport access to facilities and services in Cam, Dursley and beyond. Additional stops are proposed and will be provided within the site to improve connectivity.

31.5 The Cam and Dursley train station is located on Box Road approximately 0.5km to the east of the site and is on the main Bristol to Birmingham line, with regular train service to destinations in Gloucestershire and beyond. The train station is served by local bus routes and offers park and ride facilities for cars.

b. Are all the 18 criteria, which list a varied range of requirements, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?

31.6 Since representations were prepared in response to CD1 planning applications have been submitted for both Robert Hitchins Ltd (S.21/1913/OUT) and Persimmon Homes (S.21/1875/OUT). Although separate planning applications have been 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 were 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.

31.7 We set out in our representations our comments on the 18 criteria, and we also stated that the planning application was being prepared in parallel with Local Plan so that applications can be submitted as soon as possible and development can take place in order to support the delivery of housing in a timely manner which is consistent with the NPPF and boosting the supply of land for housing. It is considered that the preparation of a development brief including an indicative masterplan to be approved by the Council is an unnecessary requirement and will in fact delay the delivery of housing and undermine the housing trajectory. Indeed, since the Reg 19 Plan was



prepared nearly two years ago no such work has been undertaken by the Council, but at the same time the applicant has consulted, prepared, and submitted a planning application. In our representations we proposed wording to replace paragraph 2 of the policy.

- 31.8 In terms of the requirement for a 2 form entry primary school etc. there are currently a number of uncertainties and consequently the requirement for a school is thus uncertain. The provision of a school rests upon it being demonstrated to be required at the time of the determination of the planning application.
- 31.9 In terms of contributions towards secondary and further education, there is currently no evidence (Section 2.2.4 of EB110) that there is a need for additional places and so this policy requirement is not justified.
- 31.10 EB110 (the IDP Addendum August 2022) the IDP identifies that the County Council expect that a new primary school will need to be provided on site. The need or otherwise for such a school will be determined by the forecast capacity in nearby schools at the time planning permission is granted (As well as the pupil yields that will need to be set out in the Local Plan Review to accord with national policy). These cannot be pre-empted at the current time and as such there is at least a prospect that no such primary school will be required to be provided on this site. As such, the policy requirement for such a school is not justified and the policy wording should be amended to require the provision of this school only if it is demonstrated to be required at the time of the determination of a planning application.
- 31.12 Contributions towards the extension of existing health facilities is normally commercially funded and is viable without the need for contributions so it cannot be justified and effective is this is included in the policy
- 31.13 In terms of contributions to Jubilee Fields and contributions to off sites indoor sports and leisure facilities – we have suggested revised wording in our representations on Policy PS24.
- 31.14 Criteria 18 refers to phasing arrangements to ensure that employment land is developed and occupied in parallel with housing land completions. We have objected to this criterion as it is unnecessary. The site is well located in respect of existing and facilities in the vicinity and to link housing completions to the bringing forward of community provision is unnecessarily and risks housing delivery.

c. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

31.15 We submitted representations to the Additional Technical Evidence in October 2022 and commented on the following:

- EB98 Traffic Forecasting Report Addendum
- EB108 Sustainable Transport Strategy Addendum (July 2022)
- EB109 Transport Funding and Delivery Plan (July 2022)
- EB110 Infrastructure Delivery Plan (IDP) Addendum Report (August 2022)

- EB111 Stroud Local Plan Viability Assessment 2022 Refresh Report (August 2022)
- EB111a Stroud Local Plan Viability Assessment 2022 Refresh Appendices 1-11
- EB111b Stroud Local Plan Viability Assessment 2022 Refresh Appendices 12-18
- EB112 SALA Accessibility Scoring Note (August 2022)
- EB112a SALA Transport Accessibility Assessment November 2020
- EB112b SALA Transport Accessibility Assessment October 2019
- EB112c SALA Transport Accessibility Assessment July 2018

- 31.16 In summary, the impacts of the development on existing infrastructure have not been suitably assessed. As advised the assessment is based on 900 dwellings whereas the current proposals as outlined in the associated planning applications dated August 2021 (Planning Reference S.21/1913/OUT and S.21/1875/OUT), include for a potential housing delivery of up to 1,030 dwellings. An associated masterplan has also been submitted that demonstrates that the site has sufficient capacity to accommodate this level of development whilst providing appropriate levels of density in accordance with the development character of the area. Furthermore, the impact of travel patterns in 2021 since COVID 19 have not been considered as set out in representations to EB98.
- 31.17 It is likely that traffic generation as set out within Table 3.1 of the EB98 document would represent a significant overestimate of traffic levels on a per dwelling basis. On this basis it is recommended that associated adjustments are considered to these models in particular to take account of the impacts of Covid 19.
- 31.18 In terms of infrastructure funding representations have been submitted (EB109) it is considered that the approach would not provide an equitable apportionment of infrastructure costs and would unfairly target larger sites over 150 dwellings such as Cam North West that would be appropriately delivered through the local plan process. Thus, if this approach were to be implemented, this would mean that smaller sites and windfall sites in potentially less desirable locations in terms of sustainability could have significantly lower levels of transport contribution. On this basis it is recommended that this mechanism of cost allocation be reviewed.
- 3.19 In response to the IDP (EB110) It is recommended that the allocation of costs in Appendix A of the IDP be reviewed; there appears to be some items listed for Cam North West site that have a higher allocated cost when compared with other schemes that also have the same item identified. Furthermore, any allocation of transport costs would need to be directly related to the proposals and proportionate in terms of the schemes impact. This is set out in detail in our response to EB110.
- 3.20 Policy PS24 identifies appropriate requirements for delivery of local active travel infrastructure to provide connections between the proposals and nearby key facilities within Cam. In addition, the policy also includes for local bus connection. Moreover, behavioural change measures (through an associated travel plan) are also identified as a requirement (number 15). These measures should serve to ensure that opportunities to promote walking, cycling and public transport use are identified and pursued in accordance with NPPF paragraph 104.



31.21 In summary with reference to education matters (our response to EB110) in order to accord with national policy, the District Council must either:

i. robustly assess the pupil yields based on the information that is currently available, viability assess the consequences of these, set them out in the Development Plan and apply these until such time as the Local Plan Review is reviewed in the knowledge that the County Council is currently in the process of preparing new evidence; or

ii. await the completion of the work by the County Council and take account of this alongside the other available evidence to identify robust pupil yields, viability assess the consequences of these, set them out in the Development Plan and apply them accordingly.

31.22 The proposal of section 2.2.4 of EB110 provides no clarity as to how educational needs will be determined contrary to the requirements of the PPG (23b-004) and as such this cannot be accurately accounted for in the price paid for land. Depending on the yields applied this may then result in developments becoming unviable with the result that some developments may be unnecessarily delayed, and a reduced level of affordable housing may be delivered, or unable to come forward at all.

31.23. This lack of clarity also allows the County Council (as they have done previously) or indeed developers to introduce untested new pupil yields which supersede those currently available on an ad-hoc basis to justify a different level of educational contribution. This would inevitably result in significant debate and therefore delay in the determination of planning applications.

31.24. For all of these reasons, the proposal set out in section 2.2.4 of the IDP is not only contrary to national policy, but it is so vague as to be ineffective and is likely to have significant adverse effects on the delivery of sites.

d. Do any policy requirements duplicate other Plan policies and if so, why is this necessary?

e. Paragraph 3.3.9 of the Plan refers to the need for substantial structural landscaping to protect Cam's landscape setting and views from the AONB escarpment. Is this effectively set out in the policy and does the approach accord with paragraph 176 of the Framework as regards the setting of the AONB?

31.25 The site is not within the AONB, although its location below the escarpment that forms the edge of the AONB. In order to integrate the development within Cam, to mitigate noise from the M5 and to protect Cam's landscape setting and views from the AONB escarpment, the planning application for the site has taken into account the need for substantial structural landscaping. As the Design and Access Statement sets out one of the key objectives for the site in the creation of multi-functional green space has been:

- to protect and enhance Cam's distinctive sylvan, wooded character by retaining trees/hedges as primary place-making landmarks, to provide green linkages



between areas of higher ecological value and to soften the visual impact of the new development from the AONB and views from adjacent rights of way.

- Establish landscaped buffers to the north-western boundary to maintain a green edge to development envisioned in the Stroud District Local Plan and provide open space and noise attenuation benefits.

31.26 Landscape and Visual Assessment has been prepared and the Cam Parish Neighbourhood Plan and Local Design Guide has also been considered. Landscape buffers have been included along the western edge of the boundary and the eastern edge. It is considered that the approach accords with the NPPF as regards the setting of the AONB.

- f. Reference has been made within the representations to potential adverse impacts on the Severn Estuary SPA, SAC and RAMSAR site. This potential is recognised in paragraph 3.3.10 of the Plan. Has the impact of the site allocation been suitably assessed and any necessary mitigation determined in these regards?**

31.27 In our representations we considered that the policy wording should be amended to state that any identified impacts in relation to the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC should be considered and contributions to the approved SDC mitigation schemes or an independent mitigation strategy should be undertaken as appropriate.

31.28 The site is not within the zone of influence for the Cotswold Beechwood SAC Recreation Mitigation Strategy.

Strategic Site Allocation Policy PS25 Cam North East Extension

32. The site is identified as a southerly extension to the existing North East of Cam (Millfields) strategic development site. It is allocated for approximately 180 dwellings and associated community and open space uses. The policy seeks a masterplan, and states that development will include 8 listed requirements.

- a. Are the 8 criteria justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?**
- b. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?**
- c. Some of the representations raise concerns about other issues relating to the development of the site, including lack of local facilities and services, flooding, impact on landscape/AONB and loss of wildlife. Have such factors been suitably assessed as part of the process to allocate this site?**

32.1 No comments.

Local Sites Allocation Policy PS27 1-25 Long Street, Dursley

33. The site is allocated for partial redevelopment and reuse for town centre uses.

- a. The supporting text refers to the need for land assembly to maximise the redevelopment opportunities of the site whilst still providing for existing uses.**

- i. What progress has been made on this land assembly and is the site allocation deliverable?
 - ii. What existing uses are to remain?
 - iii. What amount of car parking (and any other operational requirements) will need to be retained and would this impact on any redevelopment opportunities?
 - b. Exactly what town centre uses are envisaged for the site and are these justified?
 - c. Some representations have referenced the Dursley Neighbourhood Development Plan. What are the implications of this to the site allocation and the policy requirements?
 - d. The policy states that heritage assets need to be ‘conserved and enhanced’ through high quality design, but does not specify which heritage assets this relates to. The supporting text refers to the Dursley Conservation Area, and ‘taking account of the site’s archaeological potential and its contribution to the setting and significance of nearby listed buildings’.
 - i. What assessments, if any, have been carried out of the impact of the proposed partial redevelopment and reuse of the site on the significance of these heritage assets? How has this informed the decision to allocate the site and the development requirements?
 - ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?
 - e. The policy also requires the ‘safeguarding and enhancing of local biodiversity’ but does not provide specific detail on what this relates to. The supporting text refers to the need to conserve and enhance tree planting within the site. Is this policy requirement suitably clear and is it justified? Or is this issue covered by other Plan policies?

33.1 No comments.

Local Sites Allocation Policy PS28 Land off Prospect Place, Dursley

34. The site is allocated for up to 10 dwellings, open space and town centre uses.
- a. The supporting text refers to the need for land assembly to maximise the redevelopment opportunities of the site whilst still providing for existing uses.
 - i. What progress has been made on this land assembly and is the site allocation deliverable?
 - ii. What existing uses are to remain?
 - iii. What operational requirements will need to be retained and provided for and would this impact on any redevelopment opportunities?
 - b. Can the site viably accommodate existing uses and their operational requirements, residential development and open spaces? What type and amount of open space is envisaged? Are these uses justified?



- c. The policy states that heritage assets need to be 'conserved and enhanced' through high quality design, but does not specify which heritage assets this relates to. The supporting text refers to the Dursley Conservation Area, and 'taking account of the site's archaeological potential and its contribution to the setting and significance of nearby listed buildings'.
 - i. What assessments, if any, have been carried out of the impact of the proposed partial redevelopment and reuse of the site on the significance of these heritage assets? How has this informed the decision to allocate the site and the development requirements?
 - ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?
- d. The policy also requires the 'safeguarding and enhancing of local biodiversity' but does not provide specific detail on what this relates to. Is the policy requirement suitably clear on what local biodiversity this relates to and is it justified? Or is this issue covered by other Plan policies?
- e. The supporting text refers to long views and the need for sensitive design. Is this in relation to heritage assets or the surrounding area more generally? Is this justified and if so, does it need to be specifically set out in the policy or is it covered by other Plan policies?

34.1 No comments.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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