

Our Ref: P502/PD/cd
Date: 7 November 2017

Grosvenor House
75-76 Francis Road
Edgbaston
Birmingham B16 8SP

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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

Dear Sirs

Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Localism Act 2011
Stroud District Local Plan Review; Issues and Options Paper – October 2017
Representations on behalf of The Sylvia Pearce Trust, Land at Cam, Stroud

I refer to our main representations in respect of the above. In that letter we refer to the fact that we are promoting land at Cam, Stroud on behalf of The Sylvia Pearce Trust. I attach a copy of the Plan which identifies the land in our client's ownership and you will see that this land ownership corresponds with the SHLAA reference CAM 003. We also note that the site was assessed in the Issues and Options document but was rejected on the grounds of being unsuitable by virtue of its visual impact. However, we would refer you to our letter to you of 6 January 2016, a copy of which is attached. In that letter we made it quite clear that only part of the site should be considered suitable for development i.e. that part which was identified as being adjacent to the settlement and separated from the land on the other slopes.

We would be grateful if you could explain why this explanation was not taken on board in your assessment of the site in the Issues and Options document which clearly refers to development being considered to be unsuitable on the higher slopes.

We can confirm that we would agree with your assessment that part of our client's ownership should not be considered suitable for development and that its potential is confined to the lower slopes immediately adjoining the settlement.

Could we please, therefore receive your assurance that in the future the site will only be considered in the context of the land within the blue line and that you will now reappraise its development potential.

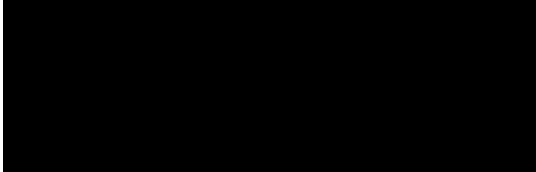
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In this context, we think it would be appropriate for us to meet with you to discuss the future development potential of the site and I will contact your offices in order to arrange a suitable convenient time and date to meet with you.

Yours faithfully



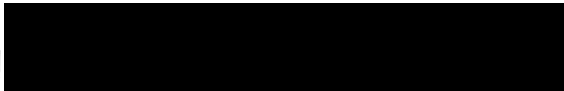
PP

Director



Encs: Site Location Plan
Letter to Stroud Council dated 6 January 2016.

CC:



Our Ref: P502/SH/rb
Date: 6th January 2016

Grosvenor House
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Edgbaston
Birmingham B16 8SP

The Planning Strategy Team
Stroud District Council
Ebley Mill
Westwood Road
Stroud
GL5 4UB

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By post and email:
localplan@stroud.gov.uk

Dear Sir/Madam

**Stroud Strategic Assessment of Land Availability (SALA)
Upthorpe Farm, Cam, Stroud**

Harris Lamb Planning Consultancy (HLPC) are instructed to promote the development of land at Upthorpe Farm, Cam through the Strategic Assessment of Land Availability (SALA) consultation by the Sylvia Pearce Children's Settlement, the site owners. Sylvia Pearce Children's Settlement owns a significant parcel of land to the east of Cam, known as land at Upthorpe Farm. The site has previously been promoted for development through both the SHLAA and the Local Plan process. The site is a suitable and available site that can provide public open space and associated infrastructure in the short term.

The attached SALA pro-forma provides the details of the site as requested. This covering letter provides further details that should be considered by officers during the SALA assessment. We would like to make the following additional comments:

- The land in the Sylvia Pearce Children's Settlement control extends to 82.5 hectares. It is appreciated that the eastern most section of the site is elevated and visually sensitive. This section of the site is not, therefore, promoted for residential development. It is our view that the section of the site immediately adjacent to the settlement boundary of Cam, that extends to c34 hectares is suitable for residential development. This area is represented by the land within the blue line on the attached plan.
- The site is capable of providing a range of supporting facilities on site alongside residential development. It is envisaged that the development of the site could deliver new playing fields, car parking for the adjoining school, elderly persons accommodation and children's play areas.
- Core Policy CP3 of the adopted Core Strategy sets out a settlement hierarchy for the district. Cam and Dursley fall within the top tier of the settlement hierarchy, Accessible Local Centres. Cam and Dursley should be a priority location for delivering additional development.

- The site is in a sustainable location for development. It is immediately opposite Cam Hopton Primary School and Cam Everlands Primary School is within the immediate vicinity of the site. There is a Tesco store to the north west of the site approximately 800m away and there are a variety of other retail opportunities in walking distance. Cam Sports Club and the Railway Inn public house are approximately 200m from the site. The site is well serviced by public transport with the bus stops at Station Road/Everlands served by the Nos. 35, 87 and 133 bus services. They provide direct connections to the local area, Draycott, Dursley and Stroud.
- The site is well related to both the centre of Cam and Dursley.
- The adopted SHLAA (April 2011) identifies the site as SHLAA site 11 – Upthorpe Farm, Cam. The SHLAA confirms that the site is both an “available” and “achievable” development location. There is a question over the “suitability” of the site for development. However, the attached SALA pro forma confirms that the site is suitable for development and there are no overriding constraints to the development of the site.
- The site is available for development immediately. The exact timing for the release of the site can be established through the emerging plan process, (please see our response to Question 5).

I trust you have found these representations useful. If you have any queries, or would like to discuss this matter further, please do not hesitate to contact me.

Yours sincerely



Director



**Enc: SALA Pro forma
Site Plan**



Stroud District Council is inviting the submission of potential development sites, in and around the District's settlements, for consideration in a new **Strategic Assessment of Land Availability (SALA)**.

Please use this form to provide information on sites within Stroud District that you would like to suggest as suitable for:

- new housing development of five dwellings or more,
- sites of 0.25 hectares/ 500 square metres of floorspace and above that could be suitable for economic development, other residential development, retail or community uses.

An **individual site submission form** is required for each site you wish to be considered in the Assessment, accompanied by a **site location plan** on an Ordnance Survey base clearly identifying the site boundaries and access to the site.

Please submit your sites by **Monday 18th January** for inclusion in the SALA 2016.

Please email your completed electronic responses to **localplan@stroud.gov.uk** or post paper copies to **The Planning Strategy Team, Stroud District Council, Ebley Mill, Westward Road, Stroud, GL5 4UB**.

Should you have any queries, the Planning Strategy Team can be contacted on 01453 754143.

Site Submission form PART A

All sites submitted under the Call for Sites will be assessed for their suitability, availability and achievability and cannot be treated confidentially.

Your details:

Please fill out this section with your personal information.

This part of the response form (Part A) will *not* be made public and will not be used for any purpose other than the Strategic Assessment of Land Availability. **Please note we will not process any anonymous responses.**

Your name

(title): Mr	first name: [REDACTED]	last name: [REDACTED]
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Site name and address

Upthorpe Farm, Cam, Stroud (Please see attached site location plan)	
	Postcode GL11 5NZ

Your company name or organisation (if applicable)

Harris Lamb Planning Consultancy

Your address

Grosvenor House
75-76 Francis Road
Edgbaston
Birmingham B16 8SP

Your email address

[REDACTED]

Your phone number

[REDACTED]

If you are acting on behalf of a client, please supply the following details:

Your client's name

(title): -	name: Correspondence c/o Agent
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Your client's company or organisation (if applicable)

Sylvia Pearce Childrens' Settlement



Site Submission form PART B

Your name

[Redacted]

Site name and address

Upthorpe Farm, Cam, Stroud
(pls see site location plan)

Postcode GL11 5NZ

Your organisation or company

Harris Lamb Planning Consultancy

Your client's name/organisation
(If applicable)

The Sylvia Pearce Childrens' Settlement

1: Your interest in the site

Please click on box to indicate

Owner of the site	<input checked="" type="checkbox"/>	Planning consultant	<input checked="" type="checkbox"/>
Parish Council	<input type="checkbox"/>	Land agent	<input type="checkbox"/>
Local resident	<input type="checkbox"/>	Developer	<input type="checkbox"/>
Amenity/ community group	<input type="checkbox"/>	Registered social landlord	<input type="checkbox"/>
Other (please specify)			

2: Site information

Please provide as much detail as possible

OS Grid reference (EENN)	3755 198 2000 51	Total site area (hectares)	82
Is the site in single ownership? Please click on box to indicate	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Developable area (hectares)	34

Current use(s) of the site (e.g. vacant, agricultural, employment etc.) Please include Use Class if known:

Agricultural

Past uses:

Agricultural

Planning history (Please include reference numbers, planning application/ SHLAA site, if known):

The site has not been the subject of any planning applications. It has, however, previously been promoted for development through the plan making process including the SHLAA (SHLAA reference site 11-Upthorpe Farm)

Access to the site (vehicle and pedestrian):

It is envisaged that a new access point could be created either from Hopton Road or Upthorpe Road.



Can the site be seen from a public road, public footpath, bridleway or other public land?

Please click on box to indicate

Yes No

3a: Is the site proposed for RESIDENTIAL development?

Yes No

Please click to indicate

If Yes:

Please see cover letter.

Number of houses 300

Number of flats

TOTAL number of units

Where possible, please click to indicate which of the following apply:

Number of units

Market housing

Yes No

Affordable housing

Affordable rent

Yes No

Shared ownership

Yes No

Is the site proposed to meet a particular need? (e.g. older people housing, self build)

Yes No

If Yes, please specify: The site is being proposed for residential development.

3b: Is the site proposed for institutional residential development?

(e.g. care home, hospital or residential college)

Yes No

Please click to indicate

If Yes, please indicate number of bed spaces and specify use :

Number of bed spaces

Use:

3c: Is the site proposed for NON RESIDENTIAL development?

Yes No

Please click to indicate

If Yes:

TOTAL floorspace

m²

Where possible, please click to indicate which of the following apply:

Floor space

Offices, research and development, light industrial (B1)

Yes No

m²

General industrial (B2)

Yes No

m²

Warehousing (B8)

Yes No

m²

Retail

Yes No

m²

Community facilities

Yes No

m²



Sports/ leisure	Yes <input type="checkbox"/> No <input type="checkbox"/>	m ²
Other: (If Yes, please specify)	Yes <input type="checkbox"/> No <input type="checkbox"/>	m ²



4: Possible constraints

Please provide as much information as possible

4a: To the best of your knowledge is there anything restricting the development potential of the site?

Please click to indicate

If Yes, please provide brief details

Contamination/ pollution	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Land stability	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Ground levels	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Mains water/ sewerage	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Electricity/ gas/ telecommunications	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Highway access and servicing	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Ownership/ leases/ tenancies/ occupiers	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Easements/ covenants	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Drainage/ flood risk	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Heritage/ landscape/ wildlife assets	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Other abnormal development costs	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	



4b: Do you believe constraints on the site can be overcome? *Click box*

Yes No

If Yes, please provide details below of how they will be overcome and the likely time frame

We are not aware of any development constraints that cannot be overcome.

(Please continue on additional sheets and attach as required)

5: Please provide an estimate of the number of dwellings/ floor space m² to be built on site per annum (1st April to 31st March)

2016/17	Pls see cover ltr	2023/24		2030/31	
2017/18		2024/25		2031/32	
2018/19	50	2025/26		2032/33	
2019/20	100	2026/27		2033/34	
2020/21	100	2027/28		2034/35	
2021/22	50	2028/29		2035/36	
2022/23		2029/30		2036/37	

6: Please indicate the current market status of the site

<i>Please click all relevant boxes</i>	<i>Please provide brief details where possible</i>
Site is owned by a developer <input type="checkbox"/>	
Site is under option to a developer <input checked="" type="checkbox"/>	
Enquiries received from a developer <input type="checkbox"/>	
Site is being marketed <input type="checkbox"/>	
No interest currently <input type="checkbox"/>	

7: Site location plan

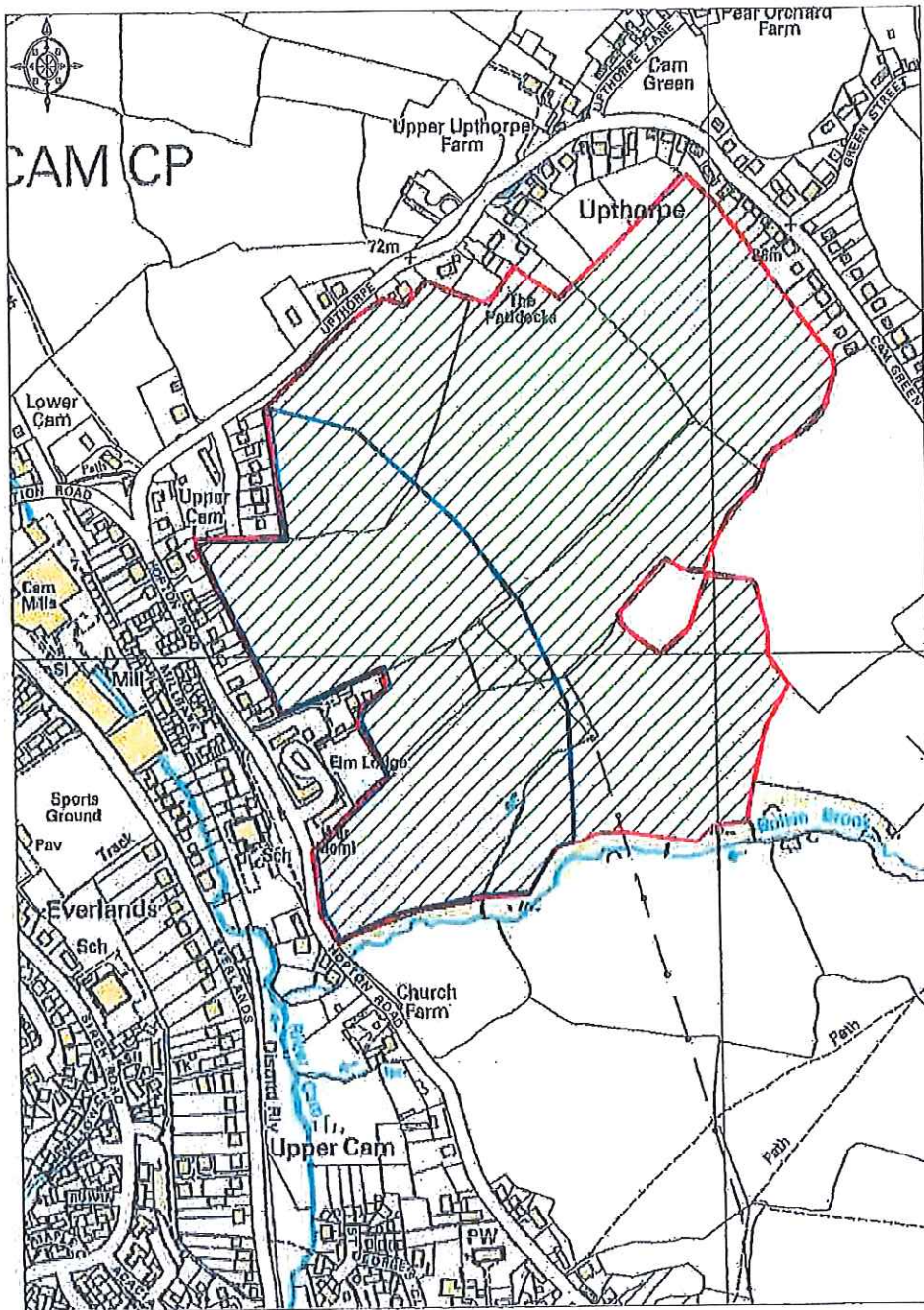
Each Site Submission Form must be accompanied by a site location plan on an Ordnance Survey base and clearly showing the site boundaries and access to the site.



Please click on box to confirm you have included the required site location plan

Yes

P502 Site Location Plan



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KEY

- Red Line: Extent of Ownership
- Blue Line: Proposed Developable Land

Cam & Dursley | Broad locations and potential sites

...CAM

Planning constraints and designations

Physical constraints include the floodplain that runs along the River Cam, together with the topography of the valley sides to the east, and the Cotswold escarpment to the southeast and southwest.

There are a number of listed buildings, primarily within Upper and Lower Cam.

Westfield and Bownace Woods and Cam Peak and Longdown Key Wildlife Sites lie to the southwest and southeast of the town respectively.

The Cotswolds AONB adjoins the southern edge of the settlement and lies to the southeast.

There are protected open spaces within the settlement and to the northwest.

The town is identified in the Local Plan as a First Tier settlement and has settlement development limits.

Landscape sensitivity

The preferred direction for housing growth in landscape terms is to the north/north east and east of the settlement.

The preferred direction for employment growth in landscape terms is to the north/northeast.

Accessibility

Cam is identified as an Accessible Local Service Centre in the Local Plan.

The settlement has a very strong local retail role. The main line rail station is the only strategic facility but there is very good accessibility to most key services and facilities, within the town and elsewhere.

Access to services and facilities elsewhere is rated **very good**.

Cam accommodates a **large** number of jobs.

Broad locations for future growth

There may be the following broad locations for further growth around the settlement, should growth be required:

CAM A South west of Manor Close (for housing and/or community uses only)

CAM B West of Draycott

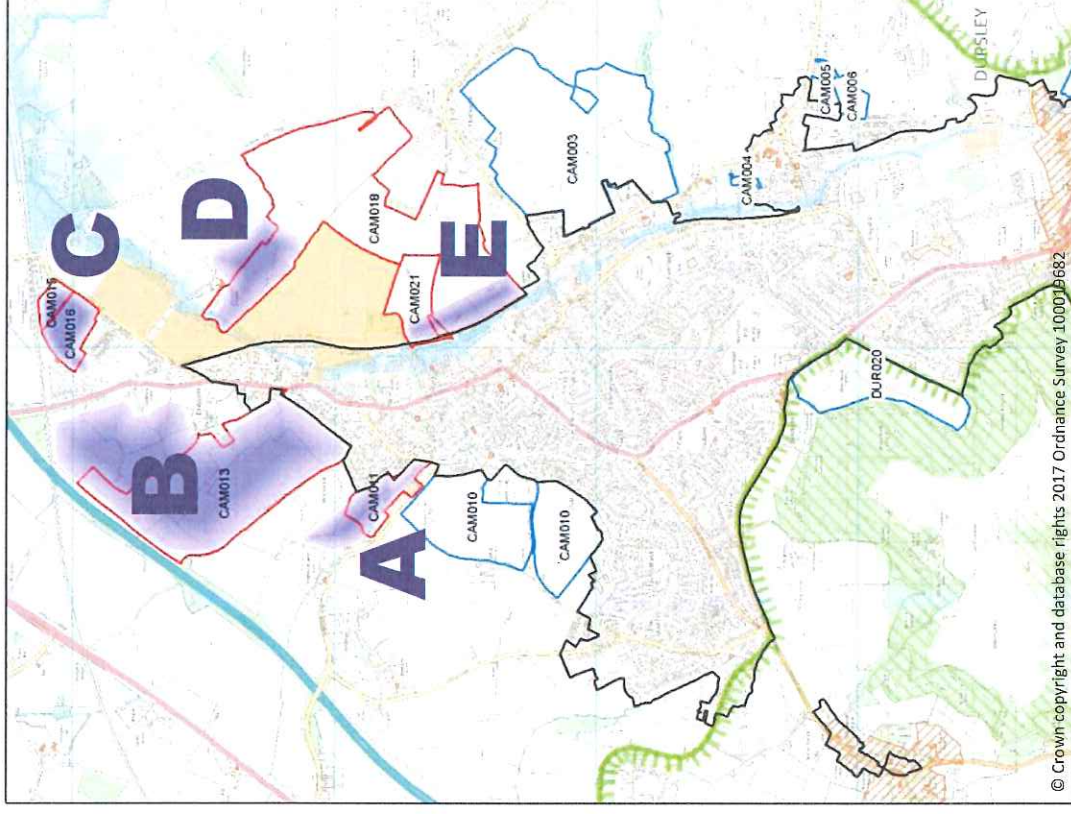
CAM C North of Box Road

CAM D South of Draycott Farm

CAM E East of River Cam (for housing and/or community uses only)

Sites with future potential

Sites identified through the 2017 SALA are shown on the map (right). Sites outlined in red may have future potential. Sites outlined in blue are considered unsuitable or not available.



Our Ref: P502/PD/cd
Date: 10 November 2017

STROUD DISTRICT COUNCIL
RECEIVED

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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

14 NOV 2017

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DEVELOPMENT SERVICES

Dear Sirs

Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Localism Act 2011
Stroud District Local Plan Review; Issues and Options Paper – October 2017
Representations on behalf of The Sylvia Pearce Trust, Land at Cam, Stroud

I can confirm that we are instructed by The Sylvia Pearce Trust to submit representations to the above document and with particular reference to the Trust's land interest at Hopton Road in Cam. (SHLAA reference CAM003)

We have written to you separately regarding the suitability, deliverability and availability of the land in question and a copy of that letter and the plan attached to it, is attached to these representations. We would be grateful if it could be noted that the area which we consider to be suitable for development is not as extensive as the SHLAA entry identified on the Plan at page 48. We consider that this is a material consideration and that development should be confined to the lower slopes, within the area indicated on the attached plan; development here would be acceptable in visual terms and also in terms of the physical relationship with the settlement of Cam.

We now turn to address the questions posed in the Issues and Options paper and comment as follows:

1. QUESTION 1.0a: KEY ISSUES

We agree that the key issues identified at points 1 to 40 are appropriate as a basis for the evolution of the draft Local Plan.

In particular we support the initiatives regarding the economic growth in Stroud District identified at 1 to 7.

We also consider that points 9 to 13, dealing with identified future housing needs including the needs of the elderly, meeting the needs of the housing market area as a whole, tackling affordable housing and ensuring that housing takes places in the right place, are key to achieving not only the aspirations of existing residents of Stroud but also those of future residents.

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Furthermore, the promotion of a strong housing market, suited to meet the needs of the Local Plan area will also be key to ensuring economic delivery.

It is important that the economic delivery is supported by the provision of new housing to accommodate all elements of the workforce including both affordable housing and housing at the upper end of the market to meet the requirements of executive personnel.

We also note the desire to conserve and enhance the district's countryside and landscape. However, it must be recognised that whilst this objective must be pursued wherever possible, it will be necessary to release some land for development in greenfield locations where these are appropriated located adjoining settlements which are best placed to provide sustainable development in terms of proximity to services, employment, etc.

In terms of the top five issues identified we believe that these are key issues 1, 9, 11, 12, and 13.

We have noted that it is important to ensure that all aspects of the housing market area are dealt with including the need for executive homes. We also consider that there will be a need to provide for specialist housing accommodation for those sectors of the community that are unable to compete in the housing market and who may have particular housing needs in respect of education and mental health issues.

2. QUESTIONS 2.1b, 2.1c and 2.1d

We agree that there should be further employment land allocations and that the potential of the land around M5 junctions should be explored since this could be attractive to inward investment.

We also suggest that there should be flexibility of use in the employment land allocations in order to allow for modern forms of business to be located in the district. This may require a widening of Class B Uses in land allocations.

3. QUESTIONS 2.3a: HOUSING NEEDS

We do consider that there may be a need to identify sites for special needs housing in the Local Plan area, particularly for those members of the community that have education or mental health issues. People who experience these difficulties can still play a very active and fulfilling role in the community but do find it difficult to find appropriate accommodation suited to their needs. Small sites can be brought forward, operated by specialist providers which will help to meet the needs of this sector of the community.

We also consider that the needs of the higher end of the market need to be considered. It is important that the district is able to attract inward investment and, as part of ensuring the district can provide a suitable offer to inward investment companies, it is necessary to ensure that all levels of the workforce can be accommodated including the needs of senior executives who will be moving into the area. Therefore, it should be recognised that some sites may be suitable for lower density, higher quality housing.

4. QUESTIONS 2.3c: SUITABLE LAND FOR DEVELOPMENT

We attach details of our client's land interest at Cam. We believe that the area identified does have potential to accommodate a mix of housing types including market, affordable and special needs housing. The land which we consider is appropriate for development is edged blue. We

can confirm that this land extends to 13.76 hectares (not 34 hectares as referred to in the attachment letter of 06/01/16 – our apologies for this error)

5. QUESTIONS 3.1: FUTURE GROWTH STRATEGY

We consider that the future development needs should largely be concentrated through Option 1 opportunities i.e. looking to allocate land for employment and housing development at sites located adjacent to the main towns in the district. This need not necessarily include 'only' large sites at the settlements but could include a range of sites.

We consider that this is important in order to ensure that the varied needs of the employment and housing market are met. For example, it might be necessary to allocate some smaller sites to ensure that the housing needs for executive housing and special needs housing are met. Concentrating on large sites only at the main settlements may cause delay in the delivery of sites whereas smaller sites can be more easily delivered in the short term and will have less implications in terms of infrastructure provision.

We would also expect some development to take place on appropriately sized sites in the large villages, in addition to the towns. However, we do not expect any significant development to take place across the smaller villages and suggest that sites that have been identified in the Issues and Option document should be deleted in the next version of the Plan.

6. QUESTIONS 3.4: OUR TOWNS AND VILLAGES – SETTLEMENT HIERARCHY

We agree that the current hierarchy based on identifying sites in higher order settlements should be adopted.

However, we suggest that little or no development should be allocated towards the lower tiers of the hierarchy (i.e. tiers 4 and 5) and that certain settlements in tier 3 should be deleted since they have no real potential to provide for sustainable development. We identify those settlements which should be deleted below.

7. QUESTIONS 3.5a: SETTLEMENT BOUNDARIES

It will be necessary to amend the existing settlement boundary to accommodate new levels of development and sites should be assessed on an individual basis.

8. QUESTIONS 3.5b: SETTLEMENT BOUNDARIES

We propose that land at Cam, identified on the attached Plan should be identified for a housing led development to incorporate market, affordable and special needs housing together with appropriate open space and strategic landscaping.

9. OUR TOWNS AND VILLAGES: BROAD LOCATIONS AND POTENTIAL SITES

We have the following comments to make in respect of this section:

- a) Brimscombe – It is not clear that any of the sites in Brimscombe are deliverable. These should be deleted from the settlement hierarchy.
- b) Chalford – On the basis of accessibility and sustainability, the site should be deleted.
- c) Horseley – This is a small-scale settlement. We believe that development here should be reallocated to higher tier settlements.

- d) Eastcombe/ Manor Village – The site appears to be poorly related to the main settlement and should be deleted.
- e) Minchinhampton – The sites do not appear to be suitable for development and should be deleted.
- f) Eastington – This appears to be a small settlement and no sites should be allocated here.
- g) Kings Stanley – Site A is objected to on the basis that this appears to affect a key wildlife site and is poorly related to the settlement.
- h) Leonard Stanley – Site B is objected to as it is poorly related to the settlement. The settlement has no retail facilities.
- i) Stonehouse – Site B2 is objected to on the basis that it is poorly related to the settlement. Similarly, site STOC is poorly related to the settlement in terms of residential use.
- j) Cam – We have the following comments to make.
- Site Cam 003 should be allocated in part for residential uses including market, affordable and special needs housing as per the attached Site Location Plan. The site is well related to the settlement and would not intrude upon the higher slopes to the east of Cam.
 - Site B should be allocated for employment uses being well related to the Strategic Highway Network, which would help to support all the strategic employment policies of the Plan.
 - Site C should be deleted as it is not well related to the settlement.
 - Site D should also be deleted as it is not well related to the settlement.
- k) Coaley – Coaley is a small settlement and does not warrant further development. The proposed site should be deleted from the Plan.
- l) Berkeley – Site C should be allocated for employment purposes and not residential.
- m) Slimbridge – The settlement does not appear to be suitable for any significant expansion and Site A as identified on the Plan should be deleted.
- n) Frampton – Site B is poorly related to the settlement and should be deleted.
- o) Whitminster – This is a small settlement and the proposed allocations A, B, E and D should be deleted.
- p) Kingswood – The allocations proposed here should be deleted.
- q) North Nibley – The proposed residential allocation should be deleted as the settlement is not sustainable.
- r) Bisley – The proposed housing allocation Site A should be deleted as the settlement is not sustainable and development should not take place within the AONB.
- s) Oakridge Lynch – The settlement has the worst access to services and facilities elsewhere and is therefore not sustainable. The proposed allocated should be deleted.

We look forward to discussing these proposals with you further.

Yours faithfully

[Redacted Signature]

Director

[Redacted Name]

Encs: Ltr to Stroud District Council dated 7/11/17; Blue Line Plan and letter of 06/01/2016

CC: [Redacted]