<u>Cam Parish Council's Response to the Local Plan Review Emerging</u> Strategy Paper Consultation: February 2019

The key issues identified within the Stroud District Council's Emerging Local Plan go some way in assessing the needs of many communities within the district as a whole but are too broad leaving in the air a multitude of options on how best to deliver these in reality.

The District's Plan has largely failed to differentiate between Dursley Town and Cam village. Much emphasis is put into supporting the district centres without taking into account the outer parishes, all of whom have their own requirements that the emerging strategy does not consider in enough depth.

Councillors and residents in Cam are very concerned about the way they believe Cam is perceived by the District Council. In the Emerging Plan Cam is treated as an expansion adjacent to the town centre of Dursley rather than a parish with its own distinct identity.

Cam's emerging Neighbourhood Development Plan wants to change outside perceptions and place emphasis on Cam's central area and community hub.

Cam is a village, not a town, but it is bigger than its neighbour, Dursley, and the second biggest conurbation next to Stroud. So it is anomalous that while the Emerging Strategy intends to support town centres, it is not quite strictly relevant to Cam.

We would like it to be, though, because our vision is to grow the existing centre into a much more attractive location and somewhere that residents and visitors really recognise as a community hub. Future developments need to take this into account and build on and maintain the village's precious green infrastructure in order to encourage more use of footpaths and open spaces in and around the centre.

Cam would welcome the opportunity to work with the District Council and other partners to bring forward suitable proposals to realise the vision of the emerging Neighbourhood Development Plan for Cam.

The proposed areas for development, within the Stroud Emerging Plan will potentially result in the parish of Slimbridge and the parishes of Cam and Wisloe merging into one urban sprawl that reduces the unique individual characteristics of those rural areas.

The SDC Local Plan states, "The countryside in some locations may be important to avoid the coalescence of towns and villages and to retain their individual character. These areas should be protected to retain visual and physical separation".

There needs to be a significant green barrier between parishes and any new development to ensure the precious historic identity and individuality of each area is retained. We believe that it is questionable whether a motorway, the M5 being the only buffer that would be left in place, is justifiably sufficient to fit this description.

Housing Needs

The development of brownfield sites within existing settlement boundaries should be given priority over the loss of any greenfield sites. A key issue noted by Cam Parish is the importance of installing new infrastructure as well as green infrastructure and improving the existing road networks and junctions.

The strategic allocation of houses for Cam as set out in the Local Plan 2016 has not yet been realised and any further developments should not be promoted until the impact of existing allocations is realised.

Cam recognises the reasoning for the approach in concentrating housing growth at the main areas where there is best connectivity to services, facilities, jobs and infrastructure but has concerns regarding the impact that further development would have on the infrastructure and facilities of the existing village and community.

Concentration of development at various locations where good access to services is currently available is seen to be beneficial, it is essential that additional services are provided in tandem or preferably prior any new housing developments so that the existing local population is not adversely affected by the increase in demand for these services that the residents of new housing will inevitably have.

Whilst Cam Parish Council recognises the potential for strategic growth to be located on the outskirts of Cam with the links and connectivity, we have concerns over the options as presented. For Cam, it is important that any growth is employment-led and that housing and infrastructure are well provided to support this overall aim.

What the Parish Council does not want is an unsustainable bolt-on to Cam that is not integrated into the community. The housing shown along Box Road at the northern end of the development area is physically remote from the existing settlement, services and the other new housing proposed, making integration and sustainability potentially difficult to achieve, but achieve it we must.

Employment

The local plan cites Cam as a primary employment location. However, we do not believe this is the case. Cam has a large proportion of commuters amongst its residents despite access to the motorway being poor. (We can hear it and see it but have to drive several miles to access it.) Commuters or not, all residents are important to Cam and where ever people are employed we want them to enjoy a thriving and integrated village with improving retail services and potential local employment.

The Parish Council's principal concern is that the intention for future housing to be developed along with a commitment that employment will follow, is an unachievable

promise. The very location, next to the M5 and the A38, of the new and proposed developments positively invites the idea of commuting.

Cam Parish Council would aspire to having sufficient jobs created through the allocation of development land in the parish. This must not only recognise the needs of the new residents of any housing development in Cam, but also of the existing residents in the area.

Any improvements that the Emerging Strategy could deliver in support of the local economy and jobs are welcomed although it is unclear how this can be guaranteed or achieved. Cam has previously been allocated a strategic development of 19ha (reduced to 11ha) through the current local plan but to date this site stays undeveloped.

More emphasis needs to be placed upon the employment needs of our community to encourage growth sites to be delivered. We believe this can be done by improving the village so it is even more attractive in terms of quality of life in the area – green infrastructure, green spaces for example – thus encouraging newcomers and residents to invest in their community.

More needs to be done to retain the existing businesses in the area also and there is some evidence that the requirements of growing businesses need to be accommodated – with larger work units, for example and removal of restrictions on multiple occupancies of the smaller units.

Whilst the regeneration of underutilised sites or low value employment sites for other uses would be welcomed, this needs to be firmly controlled, and a mixed-use development could be considered as an alternative to avoid complete loss. The evidence put forward to justify the loss of an employment site is questionable and perhaps accepted too freely. Policies should encourage more evidence to be obtained before the loss of further employment sites.

We recognise the importance of and need to support co-working and working from home facilities, not only in order to limit the impact of the existing transport network but also because there is a rising trend in this respect. Many small businesses are started in home offices and as well as looking towards new houses with those facilities, communications needs to be top of any priority list. Developers should be required to provide the network for fibre broadband for example. This is a pressing need for rural communities everywhere.

Environment

Cam is an attractive place to live and appeals to a wide and varied demographic of local and potential residents (plus wildlife). The draw of Cam's natural beauty arises

from its location nestled at the foot of the Cotswold Hills, surrounded on three sides by ancient woodland and the river Severn to the north, as highlighted in the Emerging strategy. Given the significance of the Cotswold Area of Outstanding Natural Beauty, Lantern and Heritage Walks plus the importance of the Cotswold Way National Trail to the Stroud District, its protection should be overtly referenced within the strategy, with sensitivities and considerations closely managed in conjunction with any potential development.

Cam is a village in an unsurpassable landscape and this is inescapable and should never be overlooked. If development is located inappropriately precious views of Cam Peak, Downham Hill and Longdown, some of the local familiar names within the Area of Outstanding Natural Beauty, could be compromised and for the people of Cam this would be unforgiveable as they are the essence of our village and define it for the many visitors who come to walk in the area.

The land being proposed to be built on is good agricultural land (PS24 & PS25). The NPPF states (Chapter 17, p170b) "Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan". Building on good agricultural land would mean a loss of potential economic resources of growing food and also that of local jobs for local people.

Local Green Space

It was agreed that the Emerging Strategy intends to protect existing or deliver new local green spaces and community facilities but as a lack of existing open space, sport and recreation facilities have already been recognised in the parish of Cam, the importance of a new set of higher standards to guide future development is vital.

Due to the population size of Cam, outdoor play space within the Parish is insufficient, with the overall play space provision being almost 50% lower than the national guideline requirement as identified in Stroud District Council's Outdoor Playing Space A Survey of Local Provision and Needs (September 2013). Cam's profile has 7 identified sites calculating at approx. 10.4ha meaning a shortfall of approx. 10ha based on the national recommendation of 2.4ha per 1000 population. The additional provision of green spaces will bring additional benefits to the population and further enhance the health and wellbeing of the community and wildlife.

Strong objections were noted, in our consultation, regarding the current existing approach to settlement development limits for Cam because part of the existing allocation of houses in the existing Plan and some of the new suggested allocation would be extending the settlement boundary. A large number of applications have been granted planning permission outside the settlement boundary, not without objection by the local planning authority, but nevertheless passed and in so doing

undermine the existing strategy. The settlement limits should be adhered to in order to protect existing communities.

Transport/Traffic

In addition to Cam's attractive rural location the village offers Cam residents essential transport links with its close proximity to the A38 and the Cam and Dursley station.

Reliance upon trains as a major transport link to Bristol, Gloucester, Cardiff, and Bath has increased the requirement for vehicle parking at the train station in Box Road, Added to this, the importance of improvements to the Box Road junction off the A4135 cannot be stressed enough.

The incremental developments that Cam has seen over the past few years have impacted and stretched the facilities and the public transport network to an unsustainable level. The reduction of some local public transport services has meant connectivity between the outer employment zones has become more problematic and, in some cases, unachievable to residents.

The additional traffic inevitable with new development will make our environment less safe with additional pollution and lack of infrastructure to promote safe walking, cycling, horse riding and access to public transport (NPPF Chapter 9: Promoting Sustainable Transport"). Whilst Cam and Dursley train station is only a short distance away from new development sites, it is not safely accessible by foot.

Improvements to public transport links are something Cam Parish Council and residents would like to see prioritised including, and this is seen as most important, safer routes to and from the station and to the A38 for pedestrians and cyclists. Previous planning applications have supported improvement to a suitable pedestrian/cycle bridge over the Bristol mainline railway on the A4135 but this was later removed; a greater emphasis should be placed upon the provision of enhancements to improve the link.

The Dursley and Uley Greenway is considered a vital community project and is very widely supported. The planned route should be protected as it aims to provide a safe pedestrian cycleway from Uley through to Slimbridge and on to the National Cycle Route (Sustrans).

Other issues to note

Limitation of growth at the local secondary school could prove problematic but needs to be addressed to ensure local children can attend a local school. It is expected that there will be provision of more primary education to provide for the anticipated increase in population in the current housing allocation.

Sewerage and drainage capacity were noted as another high concern for a development within Cam Parish. Concerns were raised regarding the sewerage infrastructure and whether capacity is available. 1500 houses should not be able to join the sewage network unless further significant work is undertaken to guarantee that the current parish housing will not suffer from further sewage issues due to additional housing joining the network. This proposal will go against SDC policy CP14 p 3 & 4. "Development will be supported where it achieves the following: 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development."

Finally, the concerns that were raised in response to the current local plan are being realised and should be considered again. Quote below given in response to the previous core strategy/local plan. Taken from Cam Parish /Navigus Planning representations on the previous local plan consultation. February 2012).

The Parish Council is concerned that, in order to reduce unpopular decisions on major greenfield allocations, a low housing allocation will appear in the Core Strategy with a much larger figure — potentially up to another 1,000 dwellings — following in a subsequent review. This is not sensible planning and does a great disservice to Cam, bringing the prospects of a future 'bolt on' extension which is not part of the community.

Cllr Brian Whatling

on behalf of Cam Parish