



# **CAM NEIGHBOURHOOD PLAN**

## Local Green Spaces Report

### **Appendix 9**

Pre-Regulation 14 Landowner responses and correspondence in full

**MINUTES OF A MEETING OF THE**  
**CAM PARISH COUNCIL FULL COUNCIL HELD ON**  
**WEDNESDAY 5 DECEMBER 2018**  
**AT CAM COUNCIL OFFICE, 4 NOEL LEE WAY**

**PRESENT:** B Whatling (Chair), T Grocutt, J Mills, J Sherman, P Powell, S Angell, V Lane, M Grimshaw, B Tipper, M Clifton, J Bishop,

**APOLOGIES:** F Dowsing, F Poulter, C Carter

**IN ATTENDANCE:** J Walkley (Clerk), J Tomlin - SDC Cllr

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- **To Receive and Accept Apologies for absence.**

Apologies as above were recorded and accepted

- **Chairs Announcements**

Cllr Whatling welcomed members for the meeting and noted some events that he had attended.

Interviewing for Deputy position had taken up considerable time this month with Cllr Carter.

An invitation to attend the Door Awards Evening at Stonehouse Court Hotel had been

Christmas Light Switch on Event

A message of thanks was given to all staff and councillors who attended the Christmas event in Cam. Some concern was noted regarding the traffic management – it was recommended that these concerns were passed on again to the Traders group for consideration at their next meeting.

Cllr Whatling reminded all councillors of the NOLAN principles and its employment responsibilities. It was requested to update the social media policy at the earliest opportunity.

- **To Receive Declarations of Interest and any requests for dispensations**

Cllr Grimshaw declared an interest in item regarding advertising.

- **To receive any questions, statements or submissions from members of the public in attendance**

Cllr Tomblin was present and requested to speak reiterating the importance of all attending the SDC/NP review meeting on Saturday from 10am til 1pm.

- **To Approve and Sign Minutes of the meeting held November 2018 as a True and Correct Record**

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The minutes were accepted and signed as a true and correct record by the chairman.

- **To Note any Matters Arising from the Minutes and Not Covered by Agenda Items, for Information Only**

None received

- **To receive clerk report**

Clerk report noted. No comments. (attached)

- **To note and comment on general items of correspondence received**

None reported.

- **To receive minutes of Committee meetings held in October**

Planning & Highways – received

Recreation & Leisure – received

Cllr Powell noted that he had not received minutes, Clerk offered to print and have copies available until

internet access re-enabled. Cllr Bishop requested printed copies also on blue paper. Cllr Angell requested justification as paper quota had already been taken for this year. It was AGREED to print and have available prior to next meeting single copy of blue paper for Cllr Bishop. Cllr Whatling was required to bring the meeting to order following multiple interruptions from Cllr Bishop.

*Cllr Sherman left the meeting at 6.50 and returned at 6.53.*

- **To note progress on the development of a Neighbourhood Development Plan for Cam, and agree any further actions**
- Adoption of the village Design Statement – Comments were welcomed by committee regarding any further amendments, members will be asked to consider adoption at FC/TG in Jan
- Acceptance of Landscape Sensitivity Assessment – The Sensitivity report was accepted and members were requested to read through about report any inaccuracies to the clerk/TG for adoption at FC Jan.
- LGS application letter for Woodfield Play Area – The designation letter was accepted. It was AGREED to respond to the group noting no objections from the parish council.

Next meeting with Place Studio was scheduled for the 19<sup>th</sup> January, all welcome to attend.

- **To Agree increase in cleaner cost per hour.**  
It was AGREED to accept the increase from £12 per hour to £13 for a period of 6 months to investigate further options – review May 2019.
- **To review the noise management input (SA)**  
Cllr S Angel reported that he had been in touch with companies regarding the acoustic issues at the parish office, awaiting further responses but will hopefully have more details for FC Jan.
- **To receive advertising request for Christmas Tree (up until 25th December) and firework signage on the 26-31<sup>st</sup> December on parish owned land at Cam Pitch**  
It was AGREED to allow signage on the left hand side border subject to highways approval. Sign to be removed for evenings.
- **To note training opportunities conferences and information events and confirm attendance**

No training requested

- **To receive reports on issues affecting Cam from**
  - County Councillor  
Cllr Brian Tipper - At GCC meeting (Wednesday 28 November) councillors agreed to work together to oppose the Police Crime Commissioner's (PCC) plans to transfer governance of Gloucestershire Fire and Rescue Service (GFRS) from Gloucestershire County Council to the PCC.  
Noted - Highways/wardens are removing all signage on roadside not given permission on highways owned areas.  
A request for information regarding incinerator start date but no further information was available.
  - District Councillors  
Cllr Brian Tipper – noted the local plan review and much ongoing work  
Cllr Miranda Clifton – noted budget work  
Residents satisfaction up from previous years. Their satisfaction with Stroud district as a place to live and with the way the council is run are well above the national average and on the rise, according to independent research.  
  
Some 96% of residents questioned in an annual budget survey for Stroud District Council are satisfied with their local area as a place to live (95% in 2017), and 80% are satisfied

with the way SDC is run (79% in 2017). And 94% of businesses questioned said they were satisfied that the district is a place to do business.

- **Parish Councillors**

JS – Thanked Cllrs for opportunity to lay wreath at memorial, it was an honour and well attended in the new setting.

JB – Attended cluster meeting with community service heads. Large increase in exclusions from school but not impacting Cam. Dursley Police station undergoing redecoration. PSCO working increasing to provide more information back to police to assist. The Community Safety Partnership working with DTC/CPC was ongoing. Dursley Fire station are currently recruiting new firefighters.  
Reminding to all parished for winter action plan to be in place.

MG – telephone kiosk in Cam Green completed, thanks to Cllr Poulter.

MC – Meeting shortly regarding Greenway with St Modwens/SDC – report to follow.

- **To receive quotations for Projector options and agree actions**

3 quotes had been obtained. It was AGREED to accept the quotation for Peacock Electrical aka AVGlos at the costs £1630.53 and an additional £200 delegated to enable the Clerk to purchase any additional cables or cable protector that may be required.

- **To confirm financial controls arrangements for December accounts**

It was AGREED that Cllr Angel will complete the controls in early January

- **To receive monthly financial reconciliation reports and agree payments for December**

Cllr Tipper had completed the internal controls for this month. All reported correct and signed accordingly. The payments list for December was AGREED.

- **To consider draft budget and Precept for 2019-20 recommendations from FPGP**

Full details of the draft tax base had been received from the District Council. The recommendation was accepted the proposed budget from FPGP with 2 alterations. An increase in voluntary grants to £10k and a reduction in the elections budget to £1k.

It was AGREED that £35k should be allocated within earmarked reserved for the Jubilee Field Development to allow the continuing progress on the play review and suds drainage. All other budgets should be used to minimise the precept requirement. The increase in staffing and staffing hours will require and larger increase in budget but the majority of the budget remain comparable to previous years.

- **To receive update from road safety working group (JM)**

An update was received from Cllr Mills regarding the working group meeting. It was noted that a letter would be created shortly to go to all schools to invite them along with other interest groups to attend an informal meeting to further discuss problems and solutions. Clerk to review letter and liaise with Cllr Mills regarding dates.

- **To note start date, hours of work and details for Deputy Clerk position**

It was noted that the position of Deputy Clerk had been offered and the successful candidate had accepted the position. The employment will start with the parish council on the 7<sup>th</sup> January 2019. Hours of work will be 5 days a week from 9.30- 3.30 (flexible working as required). Two good references had been received.

- **To note any items for information or referral only**

SA - Letter expected from Cam Hopton regarding advertising. Bizarre recently held at the school and approx. £3500 raised.

Cllr Powell gave thanks to staff at the office for their hard work.

VL – tree at Littlecombe still not been sorted. Clerk to enquire further.

JB – Skate park/play review at Jubilee – project next year start.

With no further business, the meeting was declared closed at 9.15



# STROUD DISTRICT COUNCIL

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[www.stroud.gov.uk](http://www.stroud.gov.uk)

The Chair  
Cam Parish Council  
4 Noel Lee Way  
Cam  
Gloucestershire  
GL11 5PS

Email: [REDACTED]  
Direct dial: 01453-754437

15<sup>th</sup> November 2018

Dear Sir

**Re: Cam Neighbourhood Development Plan Local Green Space (LGS) Nominations**

Your five letters dated variously 15<sup>th</sup> and 16<sup>th</sup> October 2018 nominate land at Manor Edge Avenue, Littlecombe, Holywell Orchard, Mill Way and Tilsdown as LGS. Please note these representations to the proposals:

Manor Edge Avenue – The proposed site includes land that is not owned by the District Council. Stroud District Council does not object to the nomination of the land to which it has title.

Littlecombe – The Littlecombe site is the subject of a legal development agreement. This representation is made on behalf of the parties to the agreement, Stroud District Council and St Modwen plc. We object to the nomination on the following grounds.

1. Various planning permissions affect the 40ha Littlecombe site for its wholesale redevelopment. Implementation of the permissions and site development have not been completed. Modifications continue to be necessary to realise the potential and the investment in recovering it from its former brownfield derelict state. Nomination would prejudice completion of the current planning permissions. Nomination would prejudice comprehensive redevelopment of Littlecombe.
2. The proposal land is part of a larger area of open, undeveloped land. Nomination would create an ad hoc and undefined area.

Holywell Orchard - Stroud District Council does not object to the nomination.

Mill Way - Stroud District Council does not object to the nomination.

Tilsdown - Stroud District Council does not object to the nomination.

Please acknowledge receipt of this letter.

Yours faithfully

[REDACTED]

[REDACTED]  
Head of Property Services

*Personal data is processed in accordance with the Council's Privacy Notice. Please see sections 1 - 10 for information about the Privacy Notice and section 20 for the details affecting Commercial Property and Land at:*  
<https://www.stroud.gov.uk/council-and-democracy/about-the-council/access-to-information/privacy-and-cookie-policy/privacy-notice>



Street Farm  
Church Rd  
Cam  
GL11 5PG

[REDACTED]  
Neighbourhood Plan Steering Group

Cam Parish Council

4 Noel Lee Way

Cam

GL11 5PS

2 November 2018

Dear [REDACTED],

Local Green Space Nomination

Thank you for the notification, received 18 October 2018, that land which we own which adjoins open space which forms part of the Littlecombe development, has been nominated as a Local Green Space.

We understand that in general terms Local Green Spaces (LGS) must satisfy the NPPF criteria. So that we can sensibly engage with you, please can you send us:

- the detailed criteria against which Cam Parish Council will be selecting and recommending that particular spaces are designated as LGSs, and
- details of the evaluation and consultation process that you are intending to follow.

To be clear, we do not see how designating our land as an LGS matches the NPPF criteria or contributes to a vision for Cam and, as owners of the land, which is land to which the public have no right of general access, we object to the proposal. We firmly believe that you should not pursue LGS designation for the land.

We look forward to hearing from you in the very near future, well before your response date of 24 November, so that we have the opportunity to give a fuller response.

Thank you.

Yours sincerely

[REDACTED] [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Local Green Space

Dear [REDACTED],

Thank you for the letter dated 18th October 2018, regarding the nomination of Street Farm Field as a potential Local Green Space in the Cam Neighbourhood Development Plan (NDP).

The Neighbourhood Plan is an evolving document that is being continually assessed by the steering group as it moves forward to being put forward for final examination. All of our surveys and reports are conducted in an open and unbiased manner.

Your comments are noted and will be included as part of the Plan's evidence base. We are currently assessing other community evidence together with your comments in order to make recommendations on which spaces to designate as Local Green Space in the Plan. We will of course come back to you about our final decision on this.

Regulation 14 consultation will follow next year, when you will again be able to formally comment on the recommendations concerning Street Farm as a potential Local Green Space. After consultation, it will ultimately be up to the Examiner to decide, based on the evidence submitted, which spaces, if any, will be designated as Local Green Space in the NDP.

Yours sincerely,

[REDACTED]

Neighbourhood Plan Steering Group



[REDACTED]  
Cam Parish Council

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
24<sup>th</sup> November 2018

Dear [REDACTED]

Process for selecting Local Green Space and nomination of Street Farm land

Thank you for your letter of 22<sup>nd</sup> November 2018. Sadly your reply does not address the questions and concerns we described in our letters to you of 2 November and 8 November. (We did not write to you on 18<sup>th</sup> October as you reference.) Please can you respond promptly to the questions below:

1. In our email of 8<sup>th</sup> November 2018 we expressed major concerns about the process that you have undertaken to select the Local Green Spaces for public consultation, giving you to opportunity to respond. You have chosen to ignore these concerns without even committing to investigating them.

We note your assertion that 'All surveys and reports are conducted in an open and unbiased manner'. In line with your assertion please can you tell us what surveys and reports were undertaken that resulted in the selection of the Street Farm field and provide us with access to these?

2. In our letter of 2<sup>nd</sup> November we asked for more details of the process being undertaken and we note that that you have specifically excluded saying that all *decisions* are taken in an open and unbiased manner.

You observe that the decision on nomination will be taken by the Steering Committee which you chair. Please can you confirm that [REDACTED] and [REDACTED] will be specifically excluded from the discussion and decision on whether to confirm the Street Farm nomination?

3. It is surprising in your description of the process going forward that Cam Parish Council itself has no role in the decision making. Please will you confirm that this is the correct interpretation of your description of the process going forward?

It is also surprising that Stroud District Council has no role in the decision making process. Please will you confirm that this is the correct interpretation of your description of the process going forward?

In both cases, if they do have role, please can you tell us what it is?

4. You will understand that we cannot and will not leave the matter there, given the threat to our land resulting from your nomination. For one last time we repeat our request to you to review our complaint about the process undertaken in proposing the Street Farm field as a Local Green Space and reconsider its legitimacy.

5. We requested that you provide us with reasons why our field has been nominated, but again sadly you have ignored this request. Given that all decisions are taken in an open manner please will you provide this information?

Against the criteria you have listed in your public questionnaire we would make the observations below. Clearly we will provide more information and supporting evidence as part of our objection should your recommendation be taken forward.

Beauty: clearly not applicable

Historical significance: all independent surveys have shown this is not applicable

Recreational Use: this is private land which does not benefit from public access beyond the rights of way across the land and hence this is not applicable

Tranquillity: clearly not applicable

Wildlife: all independent surveys have shown this is not applicable.

Other: Amongst other points, the land is outside of the settlement boundary and therefore not in need of protection in any event.


It is extremely disappointing that you have been unwilling to engage with us in this matter and we hope that on reflection you will feel able to change your approach and reply without further delay to the 5 points above

Yours sincerely

██████████

██████████

cc ██████████, Chairman Cam Parish Council

From: [REDACTED]   
Subject: Fwd: Local Green Space  
Date: 30 January 2019 17:30  
To: [REDACTED]



Begin forwarded message:

From: [REDACTED]  
Date: 28 January 2019 at 16:17:06 GMT  
To: [REDACTED]  
Subject: Fwd: Local Green Space

Begin forwarded message:

From: [REDACTED]  
Date: 19 November 2018 at 16:00:43 GMT  
To: [REDACTED]  
Subject: Fwd: Local Green Space

[REDACTED]  
these are the letters received, go through each one  
many thanks

[REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: [REDACTED] >  
Date: Sun, 18 Nov 2018 at 17:13  
Subject: RE: Local Green Space  
To: [REDACTED]  
Cc: [REDACTED] >, Deputy Clerk [REDACTED] >, [REDACTED]  
[REDACTED]

[REDACTED]

We wrote to you on 2<sup>nd</sup> November. The letter was delivered by hand to the Council office and a 2<sup>nd</sup> copy posted – a further copy is attached to this email.

We received no reply so sent an email on 8<sup>th</sup> November marked for your attention (the email below)

My wife and I were surprised to learn that our field had been nominated as a Local Green Space and deeply shocked that to learn that it had been included in a short list of sites to be put out for public consultation.

As noted in the email sent on the 8<sup>th</sup>, after enquires we have learnt that the process involved in its late inclusion in the list for public consultation appears to fall well short of the standards expected from a Committee chaired by an elected Councillor and which reports to the Parish Council.

It is really disturbing that you have chosen not to reply to our letter of the 2<sup>nd</sup> or our the email of the 8<sup>th</sup> November

We are confident that our land does not satisfy the criteria for selection as a Green Space. We strongly object to its inclusion and object very strongly to the way that Cam Parish Council has chosen to handle the process to date. We believe you should not withhold information on the process you followed in deciding to include our land on the public consultation list, or on the process you will follow in reaching a conclusion on what to include in the Neighbourhood Plan that you will put forward.

Please can you reply to our letter of the 2<sup>nd</sup> and email of 8<sup>th</sup> without further delay

Many thanks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]

**Sent:** 08 November 2018 22:20

**To:** 'Deputy Clerk' [REDACTED]

**Subject:** Local Green Space

[REDACTED], Chairman of Neighbourhood Plan Group

[REDACTED], Clerk to cam Parish council

[REDACTED]

We wrote to you on 2 November objecting to the proposed designation of our field, to which the public have no general access, as a Local Green Space, and inquired about the process you are following. In the absence of receiving any reply from you, we have been seeking information from others to understand the process that has resulted in the nomination of our field as a Local Green Space.

We understand that

- The Group set up by, and reporting to, the Parish Council to draft the Local Neighbourhood Plan for Cam has been responsible for proposing sites to be recommended as Local Green Spaces
- The Group was advised at the outset that, as in all groups engaged in public endeavours, each member must declare any interests where their impartiality might be questioned and withdraw from any discussion related to such interests.
- The Group produced a long list of 30+ green spaces after a systematic search. Our field was not on the list
- The long list was shortened to 12. Our field was not on the list
- A list of 6 green spaces were proposed for consultation with the public. Our field was not on the list
- Two new lady members of the Group, suggested that our field should be added to the list. This was challenged by some other members of the Group. It was noted that both these ladies live near to our field, one abutting it, and had been the prime movers in leading a vitriolic campaign against a planning application on our land a few years ago
- The list agreed remained at 6 Spaces. Our field was not on the list.
- However by the time the list for public consultation had been formed, our field had been added
- Before joining the Group one of the ladies involved spent some time quizzing someone we know about how land near Hardings Drive in Dursley had become a recommended Green Space.
- Soon afterwards she and her campaign colleague joined the Cam Neighbourhood Plan Group
- Whilst we have only just received the mailshot advising of the consultation, we understand that over recent weeks other residents in the area have already been lobbied by these ladies to respond to the consultation regarding the Street Farm land. It appears likely that they have embarked on a campaign along similar lines to the campaign they orchestrated against the planning application. Amongst other activities this previous campaign involved visiting all the houses in the area, demanding that residents write letters of objection.

Consequently it is clear that the personal interests of these ladies has distorted and continues to distort, the selection process. The Council cannot rely on the nomination of our field as a Green Space or rely on the responses from the public to the present consultation regarding our land. The process that has been, and is being followed, reflects extremely badly on the integrity and reputation of the Parish Council and its management of the process for creating a Neighbourhood Plan. Indeed it risks casting a shadow of doubt on all aspects of the Plan being produced.

In the circumstances it seems appropriate that you should remove our field from the list of recommended sites forthwith and give it no further consideration. Please advise by return what course of action you will follow.

We look forward to hearing from you

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

[REDACTED]  
Neighbourhood Plan Steering Group

Cam Parish Council

4 Noel Lee Way

Cam

GL11 5PS

2 November 2018

[REDACTED]  
Local Green Space Nomination

Thank you for the notification, received 18 October 2018, that land which we own which adjoins open space which forms part of the Littlecombe development, has been nominated as a Local Green Space.

We understand that in general terms Local Green Spaces (LGS) must satisfy the NPPF criteria. So that we can sensibly engage with you, please can you send us:

- the detailed criteria against which Cam Parish Council will be selecting and recommending that particular spaces are designated as LGSs, and
- details of the evaluation and consultation process that you are intending to follow.

To be clear, we do not see how designating our land as an LGS matches the NPPF criteria or contributes to a vision for Cam and, as owners of the land, which is land to which the public have no right of general access, we object to the proposal. We firmly believe that you should not pursue LGS designation for the land.

We look forward to hearing from you in the very near future, well before your response date of 24 November, so that we have the opportunity to give a fuller response.

Thank you.

Yours sincerely

[REDACTED] [REDACTED]

██████████  
Cam Parish Council  
Noel Lee Way  
Cam  
Gloucestershire  
GL11 5PS

30<sup>th</sup> November 2018

Dear ██████████

**Cam Neighbourhood Development Plan – Local Green Space Nomination, Street Farm Field**

Thank you for your letter dated 24<sup>th</sup> November 2018 outlining your concerns over the process of the nomination of Street Farm Field as a potential Local Green Space (LGS) in the Cam Neighbourhood Development Plan (NDP).

We apologise that you feel we have not reviewed your concerns to date, and hope this letter addresses the points you raise in turn.

- Local Green Space work is an ongoing process, and as such the nominated spaces have been suggested and considered against national policy criteria as work on the NDP has progressed. The process to date is outlined below:
- At the start of the NDP process, an initial long list of 41 possible LGS was drawn up by the Steering Group.
- The Steering Group then edited this list to a shortlist of 12 possible LGS; those sites considered by the Steering Group to have a good level of protection already afforded to them through other means were eliminated from the long list.
- Initial evidence of community support for the 12 possible LGS was collected as part of the NDP questionnaire in 2016.
- In Spring 2018, some further short listing was undertaken to eliminate school playing fields from the list; national planning policy states that these cannot be designated LGS.
- This also included some additional green spaces being suggested, discussed and initially assessed as potential LGS. This included your land, Street Farm Field, along with Tilsdown Square, Mill Way Triangle and Manor Avenue Edge. The shortlist was agreed by the Steering Group to include these areas in informal consultation to ascertain whether they are ‘demonstrably special to the community’; one of the criteria required by national planning policy.
- This informal community consultation has taken place over summer 2018, and is due to close early 2019.
- Landowner notification, including the letter sent to you, has also taken place, informing landowners of the consideration of their land as potential LGS, and inviting their comments.

All of the supporting information and further detail on the process to date will be documented and available for review very soon as part of the draft Local Green Space Report. We will keep you informed as to when this will be available; it is currently being drafted.

It must be stressed that at the moment the local green space work is in its relative early stages of informal evidence gathering and consultation. At the end of the community consultation, the Steering Group will assess the community comments, along with landowner comments

and concerns including your own, to make a decision on which spaces to recommend as LGS in the NDP. The recommendations will also be made considering other evidence collected as part of other NDP work such as Green Infrastructure and Landscape evidence.

The Steering Group's recommendations will then be discussed and agreed by the Parish Council, then subject to formal Regulation 14 consultation where comments will be invited and considered again. After this, the NDP will be subject to Regulation 15, and then Regulation 16 consultation with Stroud District Council, during which comments will again be invited and considered.

The content of the NDP, including its LGS recommendations, will then ultimately be decided by an independent Examiner. There will then be a public referendum deciding whether the NDP should be 'made' part of the local development plan.

- We understand your concern over the decision making process to determine the local green space recommendations, and wholly agree that decisions on recommendation for LGS designation should be made in an open and unbiased manner. Our letter (dated 22<sup>nd</sup> November 2018) was not intended to imply that decisions will not be made as such. Rather, we did intend to highlight the whole process, including the decisions on recommendations for LGS designation, as open and unbiased.

Steering Group members have expressed any interest they hold and any discussion on final recommendations will exclude the relevant Steering Group members who have expressed interest in any land.

3. Both Cam Parish Council and Stroud District Council have a role in the NDP process, including the LGS work.

As mentioned in 2 above, as the NDP's qualifying body, Cam Parish Council will approve the content of the draft NDP before it is taken to formal consultation stages (Regulation 14 and onwards). The NDP group will present the draft NDP (including the LGS recommendations) to the Parish Council, who will discuss and agree its recommendations.

Stroud District Council are statutory consultees of the NDP, so will be formally consulted during Regulation 14, 15 and 16 consultation.

- It is hoped this point is covered by 1-3 above and 5 below.
- The NDP Steering Group have suggested green spaces thought to be of community value as potential LGS, and Street Farm Field was nominated in relation to its:
  - Recreational Use: The Public Rights of Way across the land are of local importance, especially due to their links to walks in the nearby countryside
  - Beauty: The space is considered a pleasant green gap between the urban area of Cam and the countryside.

The community evidence that is currently being collected is a way to test whether there is sufficient support for the nominated spaces to be considered 'demonstrably special to the community' in relation to any or all of the criteria defined by national planning policy (including those given in A & B above).

Please be assured that your points are all noted, and will be considered by the Steering Group alongside community comments when assessing which spaces to recommend for LGS designation. We will keep you informed as work progresses.

We hope the above is helpful and explanatory, but if you have further concerns please get in touch.

Yours sincerely,

████████████████████

████████████████████, Chairman of Cam Parish Council



[REDACTED]  
Neighbourhood Plan Steering Group  
Cam Parish Council  
4 Noel Lee Way  
Cam  
Gloucestershire  
GL11 5PS

Dear [REDACTED]

### **Local Green Space Nomination**

#### **Objection to Local Green Space nomination at Everlands – land referred to as 'Riverside'**

We have received a letter of notification from Cam Parish Council on the 18<sup>th</sup> October 2018 informing us that the land we own at Everlands, (referred to in your letter as 'Riverside') has been nominated as a Local Green Space.

On behalf of the family [REDACTED] has since telephoned on a number of occasions and written to you requesting that someone ring or e mail her to provide specific details as to the criteria on which the land has been nominated. We have also asked for details as to the evaluation and consultation process. As the owners of the land we have the right to have an opportunity to present our case as to why this proposal should not go ahead. [REDACTED] was assured by the Clerk at Cam Parish Council that someone would ring her to discuss and explain the process. To date no council representative has followed up this legitimate request for further details, which is concerning given the potential impact on our land. There appears to be a clear lack of transparency about the process.

Given the deadline of the 24<sup>th</sup> November for us to provide an initial response we are now writing to you **to express our strong objection to the proposal that the site at Everlands be nominated as a Green Space.**

We understand that nominating an area as Local Green Space is a restrictive and significant policy designation and that plan makers need to clearly demonstrate that the requirements for its allocation are met in full, in line with nationally defined criteria as set out in the National Planning Framework. The Framework clearly stipulates that; *'The Local Green Space designation will not be appropriate for most*

*green areas or open spaces*: In order to be suitable for designation, the local green space must be:

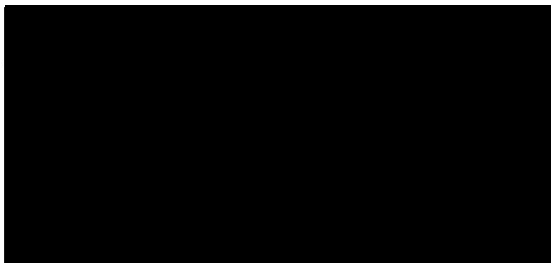
- In reasonable close proximity to the community it serves;
- Demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historical significance, recreational value, tranquillity or richness of wildlife; and not an extensive tract of land.


We do not see how our land at Everlands satisfy the above criteria and we have robust arguments to support our objections to this proposal which we will set out in full to Cam Parish Council when we are formally notified as to the process for doing so.

**In summary therefore as the landowners of the site at Everlands, referred to as 'Riverside,' we strongly object to the proposal to nominate the land as Local Green Space.** We look forward to setting out our objections in more detail to the council.

Please can you acknowledge receipt of this letter.

Yours sincerely,





Cllr [REDACTED]  
Neighbourhood Plan Steering Group  
Cam Parish Council  
4 Noel Lee Way  
Cam  
GL11 5PS

Dear [REDACTED]

### **Local Green Space Nomination**

#### **Objection to Local Green Space nomination at Everlands – land referred to as 'Riverside'**

We have received a letter of notification from Cam Parish Council on the 18<sup>th</sup> October 2018 informing us that the land we own at Everlands, (referred to in your letter as 'Riverside') has been nominated as a Local Green Space.

On behalf of the family [REDACTED] has since telephoned on a number of occasions and written to you requesting that someone ring or e mail her to provide specific details as to the criteria on which the land has been nominated. We have also asked for details as to the evaluation and consultation process. As the owners of the land we have the right to have an opportunity to present our case as to why this proposal should not go ahead. [REDACTED] was assured by the Clerk at Cam Parish Council that someone would ring her to discuss and explain the process. To date no council representative has followed up this legitimate request for further details, which is concerning given the potential impact on our land. There appears to be a clear lack of transparency about the process.

Given the deadline of the 24<sup>th</sup> November for us to provide an initial response we are now writing to you **to express our strong objection to the proposal that the site at Everlands be nominated as a Green Space.**

We understand that nominating an area as Local Green Space is a restrictive and significant policy designation and that plan makers need to clearly demonstrate that the requirements for its allocation are met in full, in line with nationally defined criteria as set out in the National Planning Framework. The Framework clearly stipulates that; *'The Local Green Space designation will not be appropriate for most*

*green areas or open spaces*. In order to be suitable for designation, the local green space must be:

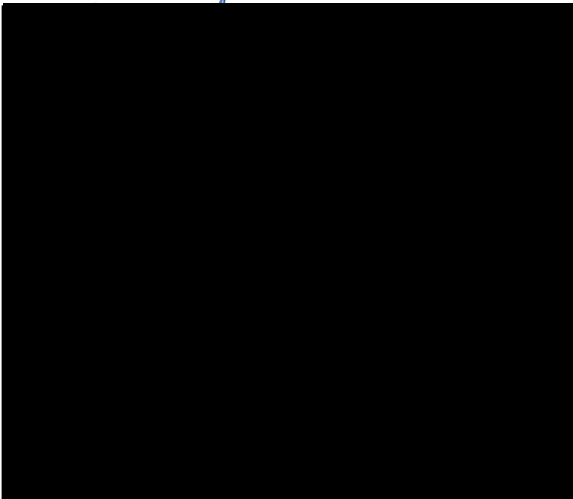
- In reasonable close proximity to the community it serves;
- Demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historical significance, recreational value, tranquillity or richness of wildlife; and not an extensive tract of land.

We do not see how our land at Everlands satisfy the above criteria and we have robust arguments to support our objections to this proposal which we will set out in full to Cam Parish Council when we are formally notified as to the process for doing so.

**In summary therefore as the landowners of the site at Everlands, referred to as 'Riverside,' we strongly object to the proposal to nominate the land as Local Green Space.** We look forward to setting out our objections in more detail to the council.

Please can you acknowledge receipt of this letter.

Yours sincerely,



12/11/18

Cllr [REDACTED]  
Neighbourhood Plan Steering Group  
Cam Parish Council  
4 Noel Lee Way  
Cam GL11 5PS



Dear [REDACTED]

**Local Green Space Nomination**

Thank you for your letter of notification received on the 19 October in which you notify us that the land we own alongside Everlands has been nominated as a Local Green Space.

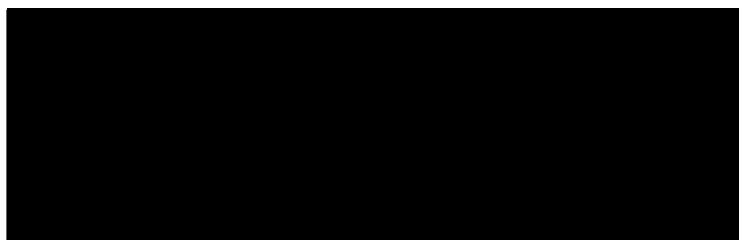
We would like to register our objection to this proposal and will write to you again before the 24 November in more detail but **we need some more information from you at this stage.**


I would have expected your initial letter to clearly set out the process/ procedure that you will follow, and the opportunity that, as the landowners, we will have to voice our view on this very important matter. I would appreciate a prompt response to this letter that sets out this information in full. Please could you provide this as soon as possible and well before the 24<sup>th</sup> November so I have the opportunity to reply in full? Given the short timescale please send this information by e mail to;




You set out in your letter that in order for the land to be suitable it must fulfil the nationally defined criteria for a Green Space. We do not see how our land meets any of these criteria and would be grateful if you could make clear in your response to this letter on what grounds our land has been proposed as a Green Space.

I look forward to hearing from you by return if possible so that I have sufficient time to provide a clear response to your proposal,





Cllr   
Neighbourhood Plan Steering Group  
Cam Parish Council  
4 Noel Lee Way  
Cam  
GL11 5PS

19<sup>th</sup> November 2018

Dear 

**Local Green Space Nomination**

**Objection to Local Green Space nomination at Everlands – land referred to as ‘Riverside’**

We have received a letter from Cam Parish Council dated 18<sup>th</sup> October 2018 notifying us that the land we own at Everlands, referred to in your letter as ‘Riverside’ has been nominated as a Local Green Space. I am sending this letter to register my objection to this proposal as one of the joint landowners. You will receive a letter from each of the landowners expressing the same opinion.

In due course we will set out our objections in more detail.

Yours sincerely



[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Local Green Space

Dear [REDACTED]

Thank you for the letter dated 12th November 2018, regarding the nomination of Riverside as a potential Local Green Space in the Cam Neighbourhood Development Plan (NDP).

The Neighbourhood Plan is an evolving document that is being continually assessed by the steering group as it moves forward to being put forward for final examination. All of our surveys and reports are conducted in an open and unbiased manner.

Your comments are noted and will be included as part of the Plan's evidence base. We are currently assessing other community evidence together with your comments in order to make recommendations on which spaces to designate as Local Green Space in the Plan.

We will of course come back to you about our final decision on this. Regulation 14 consultation will follow next year, when you will again be able to formally comment on the recommendations concerning Riverside as a potential Local Green Space. After consultation, it will ultimately be up to the Examiner to decide, based on the evidence submitted, which spaces, if any, will be designated as Local Green Space in the NDP.

Yours sincerely,

[REDACTED]

Neighbourhood Plan Steering Group

[REDACTED]  
Cam Parish Council  
Noel Lee Way  
Cam  
Gloucestershire  
GL11 5PS

30<sup>th</sup> November 2018

Dear [REDACTED]

**Cam Neighbourhood Development Plan – Local Green Space Nomination, Riverside (land at Everlands)**

Thank you for your letter dated 18<sup>th</sup> November 2018 outlining your objection to the consideration of Riverside (land at Everlands) as a potential Local Green Space (LGS) in the Cam Neighbourhood Development Plan (NDP).

We apologise that you feel we have not reviewed your concerns to date, and hope this letter provides the information you need.

Local Green Space work is an ongoing process, and as such the nominated spaces have been suggested and considered against national policy criteria as work on the NDP has progressed. The process to date is outlined below:

- At the start of the NDP process, an initial long list of 41 possible LGS was drawn up by the Steering Group.
- The Steering Group then edited this list to a shortlist of 12 possible LGS; those sites considered by the Steering Group to have a good level of protection already afforded to them through other means were eliminated from the long list.
- Initial evidence of community support for the 12 possible LGS was collected as part of the NDP questionnaire in 2016.
- In Spring 2018, some further short listing was undertaken to eliminate school playing fields from the list; national planning policy states that these cannot be designated LGS.
- This also included some additional green spaces being suggested, discussed and initially assessed as potential LGS. This included Street Farm Field, Tiltdown Square, Mill Way Triangle and Manor Avenue Edge. The shortlist was agreed by the Steering Group to include these areas in informal community consultation to ascertain whether they are 'demonstrably special to the community'; one of the criteria required by national planning policy.
- This informal community consultation has taken place over summer 2018, and is due to close early 2019.
- Landowner notification, including the letter sent to you, has also taken place, informing landowners of the consideration of their land as potential LGS, and inviting their comments.

All of the supporting information and further detail on the process to date will be documented and available for review very soon as part of the draft Local Green Space Report. We will keep you informed as to when this will be available; it is currently being drafted.

It must be stressed that at the moment the local green space work is in its relative early stages of informal evidence gathering and consultation. At the end of the community consultation, the Steering Group will assess the community comments, along with landowner comments and concerns including your own, to make a decision on which spaces to recommend as LGS in the NDP. The recommendations will also be made considering other



evidence collected as part of other NDP work such as Green Infrastructure and Landscape evidence.

The Steering Group's recommendations will then be discussed and agreed by the Parish Council, then subject to formal Regulation 14 consultation where comments will be invited and considered again. After this, the NDP will be subject to Regulation 15, and then Regulation 16 consultation with Stroud District Council, during which comments will again be invited and considered.

The content of the NDP, including its LGS recommendations, will then ultimately be decided by an independent Examiner. There will then be a public referendum deciding whether the NDP should be 'made' part of the local development plan.

The NDP Steering Group have suggested green spaces thought to be of community value as potential LGS, and Riverside (land at Everlands) was nominated in relation to its:

- A) **Recreational Use:** The space is valued by walkers and dog walkers for its riverside walks.
- B) **Tranquillity & Beauty:** The space's abundance of trees, the River Cam, and areas for bird watching offer a tranquil space away from built development.
- C) **Historical Significance:** Remnants of the old Dursley Donkey Railway Line and Railway bridge steps.

The community evidence that is currently being collected is a way to test whether there is enough support for the nominated spaces to be considered 'demonstrably special to the community' in relation to any or all of the criteria defined by national planning policy (including those given in A, B & C above).

Please be assured that your objection is noted and will be considered by the Steering Group alongside community comments when assessing which spaces to recommend for LGS designation. We will keep you informed as work progresses.

We hope the above is helpful and explanatory, but if you have further concerns please get in touch.

Yours sincerely,



[REDACTED]  
Cam Parish Council  
Noel Lee Way  
Cam  
Gloucestershire  
GL11 5PS

30<sup>th</sup> November 2018

Dear [REDACTED]

**Cam Neighbourhood Development Plan – Local Green Space Nomination, Riverside (land at Everlands)**

Thank you for the letter dated 19th November 2018, regarding the nomination of Riverside (land at Everlands) as a potential Local Green Space in the Cam Neighbourhood Development Plan (NDP).

Your comments are noted and will be included as part of the NDP's evidence base. We are currently assessing other community evidence together with your comments in order to make recommendations on which spaces to designate as Local Green Space in the Plan. We will of course come back to you about our final recommendations on this. We have also written to other members of the Harris family who have requested further information, outlining the LGS process in more detail.

Regulation 14 consultation (the first stage of formal consultation) will follow next year, when you will again be able to formally comment on the recommendations concerning Riverside (land at Everlands) as a potential Local Green Space. After consultation, it will ultimately be up to the Examiner to decide, based on the evidence submitted, which spaces, if any, will be designated as Local Green Space in the NDP.

Yours sincerely,

[REDACTED]

[REDACTED]  
Cam Parish Council  
Noel Lee Way  
Cam  
Gloucestershire  
GL11 5PS

30<sup>th</sup> November 2018

Dear [REDACTED],

**Cam Neighbourhood Development Plan – Local Green Space Nomination, Riverside (land at Everlands)**

Thank you for your letters dated 12<sup>th</sup> and 18<sup>th</sup> November 2018 outlining your objection to the consideration of Riverside (land at Everlands) as a potential Local Green Space (LGS) in the Cam Neighbourhood Development Plan (NDP).

We apologise that you feel we have not reviewed your concerns to date, and hope this letter provides the information you need.

Local Green Space work is an ongoing process, and as such the nominated spaces have been suggested and considered against national policy criteria as work on the NDP has progressed. The process to date is outlined below:

- At the start of the NDP process, an initial long list of 41 possible LGS was drawn up by the Steering Group.
- The Steering Group then edited this list to a shortlist of 12 possible LGS; those sites considered by the Steering Group to have a good level of protection already afforded to them through other means were eliminated from the long list.
- Initial evidence of community support for the 12 possible LGS was collected as part of the NDP questionnaire in 2016.
- In Spring 2018, some further short listing was undertaken to eliminate school playing fields from the list; national planning policy states that these cannot be designated LGS.
- This also included some additional green spaces being suggested, discussed and initially assessed as potential LGS. This included Street Farm Field, Tiltdown Square, Mill Way Triangle and Manor Avenue Edge. The shortlist was agreed by the Steering Group to include these areas in informal community consultation to ascertain whether they are 'demonstrably special to the community'; one of the criteria required by national planning policy.
- This informal community consultation has taken place over summer 2018, and is due to close early 2019.
- Landowner notification, including the letter sent to you, has also taken place, informing landowners of the consideration of their land as potential LGS, and inviting their comments.

All of the supporting information and further detail on the process to date will be documented and available for review very soon as part of the draft Local Green Space Report. We will keep you informed as to when this will be available; it is currently being drafted.

It must be stressed that at the moment the local green space work is in its relative early stages of informal evidence gathering and consultation. At the end of the community consultation, the Steering Group will assess the community comments, along with landowner comments and concerns including your own, to make a decision on which spaces to recommend as LGS in the NDP. The recommendations will also be made considering other

evidence collected as part of other NDP work such as Green Infrastructure and Landscape evidence.

The Steering Group's recommendations will then be discussed and agreed by the Parish Council, then subject to formal Regulation 14 consultation where comments will be invited and considered again. After this, the NDP will be subject to Regulation 15, and then Regulation 16 consultation with Stroud District Council, during which comments will again be invited and considered.

The content of the NDP, including its LGS recommendations, will then ultimately be decided by an independent Examiner. There will then be a public referendum deciding whether the NDP should be 'made' part of the local development plan.

The NDP Steering Group have suggested green spaces thought to be of community value as potential LGS, and Riverside (land at Everlands) was nominated in relation to its:

- D) **Recreational Use:** The space is valued by walkers and dog walkers for its riverside walks.
- E) **Tranquillity & Beauty:** The space's abundance of trees, the River Cam, and areas for bird watching offer a tranquil space away from built development.
- F) **Historical Significance:** Remnants of the old Dursley Donkey Railway Line and Railway bridge steps.

The community evidence that is currently being collected is a way to test whether there is enough support for the nominated spaces to be considered 'demonstrably special to the community' in relation to any or all of the criteria defined by national planning policy (including those given in A, B & C above).

Please be assured that your objection is noted and will be considered by the Steering Group alongside community comments when assessing which spaces to recommend for LGS designation. We will keep you informed as work progresses.

We hope the above is helpful and explanatory, but if you have further concerns please get in touch.

Yours sincerely,



14 January 2019

████████████████████  
Councillor ██████████  
Neighbourhood Plan Steering Group  
Cam Parish Council  
4 Noel Lee Way  
Cam  
GL11 5PS

Dear ██████████

**Cam Neighbourhood Development Plan – Local Green Space Nomination,  
Riverside (land at Everlands)**

I am writing on behalf of my clients ██████████ and ██████████ in relation to the above land as a potential area of Local Green Space (LGS) in the emerging Cam Neighbourhood Development Plan. This follows your recent correspondence with ██████████ dated 15 October and 30th November 2018. I am aware that a decision has not yet been made in relation to whether this site is a suitable candidate for an LGS designation and on that basis my clients have requested that I as a Chartered Town Planner provide an independent assessment of the merits of this site's designation against central government guidance.

**National and Local Policy Context**

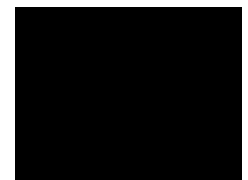
Central government policy on green space protection and designation is set out at paragraphs 99 – 101 of the NPPF and at Paragraph: 005 Reference ID: 37-005-20140306 of the PPG which says that: -

“Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities”

Paragraph: 011 Reference ID: 37-011-20140306 of the PPG then goes onto to say that: -

“If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.”

Paragraph 100 of the NPPF says that



“The Local Green Space designation should only be used where the green space is:

- a) In reasonably close proximity to the community it serves;
- b) Demonstrably special to a local community and holds a particular local significance. Examples used are as follows: -
  - Sites of locally significant beauty;
  - Sites of historic significance;
  - Sites of significant recreational value, (including as a playing field);
  - Sites of significant tranquillity or richness of its wildlife;
- c) Local in character and is not an extensive tract of land”

Paragraph 101 also says that “development within a Local Green Space should be consistent with policy for Green Belts”

Based on this context it is reasonable to conclude that local green space designations need to be “demonstrably special” and not simply any area of open space, or part of the open countryside. I consider that it is important to make this distinction because the adopted Stroud District Local Plan (2015) already contains policies for the protection of the intrinsic beauty of the countryside for its own sake. Policy CP15 does not permit development outside of development limits except in very few strictly regulated circumstances.

### **Cam Neighbourhood Development Plan LGS Nomination Process**

With regard to the emerging Neighbourhood Development Plan Local Green Space nomination process, I am aware from your letter of 30th November 2018 that a long list of potential sites were identified and that these were shortlisted down to 12. I understand these were then the subject of the NDP questionnaire. What seems to be absent at this stage is an methodology that applies some form of quantitatively measurable criteria of quality and aided by a local checklist. I assume this will become apparent as part of the Parish Council’s draft Local Green Space Report. However, at the present time there is a lack of any kind of robust methodology or scoring system supported by empirical evidence. Selecting sites on the basis of a subjective analysis with reference to the NPPF criteria at paragraph 100 will not in my view satisfy the Neighbourhood Plan Examiner.

### **Local Green Space Nomination – Riverside (land at Everlands)**

Turning now to my client’s land identified as Riverside (Everlands), I have recently visited the site and can provide the following assessment: -

In my view the land is largely screened from public view by a mature tree belt along its road side boundary. From here the land slopes downward to the river

and it contains a dense tree cover. It is largely overgrown with brambles and other shrubbery giving it an unkempt appearance. Consequently, it provides no view or vantage point from which to enjoy views of the nearby Cotswold escarpment. In my judgement it does not appear intrinsically beautiful to look at any more than any other part of the open countryside surrounding Cam and Dursley.

The site at one time contained a railway line, and the former railway bridge and steps are visible near to the public footpath. However, due to the overgrown nature of the site I could see no evidence of the former railway line. The existing steps and bridge (although clearly remnants of a railway past) only occupy a small part of the larger site which extends a considerable distance in either direction. In my opinion, within this larger area, any remains of a railway history have been lost.

In my assessment, the site has limited recreational value. The site is in private ownership, the majority of which is not publicly accessible. The only part of the site which can be accessed is the public footpath which runs from Everlands to St Georges Close.

Although the remainder of the site is not secure (and indeed on my site visit I did see evidence of other informal pathways) encroachment onto this land would be trespassing. On this basis most of the site holds no recreational value because the land is not publicly accessible and therefore cannot be used for recreational purposes.

I agree that the site has a tranquil quality to it that provides a relief to the built up areas between St Georges Close and Everlands. This is disturbed by road noise on one side but nevertheless has a secluded character to it. However, I do not regard this as demonstrably special. I note that the land lies outside of the settlement boundary of the town, and is therefore in the open countryside. This means that its undisturbed character is already protected under the adopted Local Plan Policy CP15. The site forms the backdrop the the built-up residential area and is already protected as countryside. I therefore see no justification for a further local designation which would simply add another unnecessary layer of control.

## **Conclusion**

In my assessment, the site does not fit with any of the criteria listed under paragraph 100 of the NPPF. The site is largely overgrown and unkempt which carries no particular beauty in my opinion. The site contains a part of a former railway bridge, but otherwise no evidence of its railway past is visible within the undergrowth. The land is in private ownership and consequently its recreational value is confined only to the public footpath which extends across a short distance of the site. Lastly, whilst does have a tranquil quality, this is already protected by its designation in the open countryside.

For these reasons I can advise that should this site continue to be nominated as a LGS it will be robustly resisted at the Examination hearings.

Yours sincerely,

[Redacted signature block]

[Redacted signature block]

[Redacted mark]