



CAM NEIGHBOURHOOD PLAN

Local Green Spaces Report

Appendix 13

Full responses received in relation to Local Green Space as part of Regulation 14 Consultation

Appendix 13 Cam Parish Neighbourhood Plan Local Green Space Report		
Public comments made during Regulation 14 Consultation		
Page / Clause / Para	Comment	Proposal (where relevant)
Green Infrastructure and Biodiversity, Local Green Spaces	Our village is growing so large because we so say have the infrastructure to support more development. This makes protection of our green spaces within the community more important than ever. Recent small high density developments have minimal gardens or green areas included in the design. This is unhealthy for the residents and unattractive for the community. There is much evidence available now that nature, greenery and trees are good for people's health and wellbeing and for the environment. I support anything Cam Parish Council and Stroud District Council can do to promote this. I am in agreement with all aspects of the draft document as it stands and would vote YES to its adoption in a referendum.	
Local Green Spaces	All the local green spaces should be saved but especially the four in Upper Cam. The village has had enough to put up with Littlecombe being built. Having local green spaces keeps the village feel of the area.	
General, local green spaces	I agree with everything you are trying to do but particularly the local green spaces.	
Green infrastructure, local green spaces, woodland and special trees.	As a regular visitor to the area as a lover of nature and for birdwatching you must protect what you have. When it's gone it's gone for good. So much of Cam has already been spoilt. Save the trees, hedges and the local green spaces or it will become a concrete jungle. Save the views from Cam Peak and the long down. Dont build in back gardens.	
General, Local Green Spaces	Mainly the LGS but in general the plan is very good. Protecting all the proposed LGS is vital to the youngsters of the parish and in particular the Cam Sports Ground is my priority to be a protected area the number of people adults down to young children have many hours of pleasure using this area. In general I think everything is covered . Of utmost importance is with the new houses we have jobs,schools, doctors and road infrastructure.	
General, local green spaces	A good overall plan. Cam Sports Ground must be protected for the future of our youngsters and adults	
Page 48 Policy CAMCF2 ref LG59 Street Farm Field and LGS10 Riverside Land at Everlands	My garden at our house on St Georges Close lies directly adjacent to LGS10 Riverside land at Everlands and ends at the field between St Georges Close and Everlands LG59 Street Farm Field?? LGS10 is an area of woodland that includes part of the river cam which runs alongside our garden. My own trees and shrubs lie directly next to this land and along the riverbank. I believe that our land finishes in the centre of the river. In the 5 years that we have lived in St Georges Close we have seen an abundance of wildlife including heron, badgers, foxes, deer, ducks, moorhens, otters, squirrels, owls, bats, snakes, trout, kingfishers, woodpeckers plus at least 6 other breeds of bird. If we were to lose this area of woodland then we would not only lose our beautiful view from our house which would have an adverse affect on our family and devalue our property but we would also lose the huge amount of wildlife that have made it their home. This area is regularly used by dog walkers, scouts and local schools. It is also on a flood plain so would make any property subject to flooding. The field between the bottom of our garden and Everlands is also home to much of the same wildlife that I described earlier. The field has flooded several times in the last few years which again makes it unsuitable for building on. Any builds on this would also affect our view and devalue our property. Keep as many green spaces as possible, provide a home for nature and don't spoil the beauty of Cam.	
General	For me the most important pages are the sections including the design code, the protected green spaces, and the vision for the future. I am keen to prevent building on these areas used by children to play on, and people to walk their dogs, have picnics etc., acting as lungs to the built up area. I like the ideas for future projects and hope these will be pursued. I hope future building can be restricted to north Cam as Cam is having to absorb a lot of new building already.	
CamCD1 Cam CD2 Cam CD4 CF1 CamE1 CamE2	I very strongly support the creation of Local Green Spaces (CAMCF2), in particular: LGS10 Riverside, land at Everlands LGS7 Cam Sports Ground LGS8 Littlecombe Meadow LGS9 Street Farm Field I also support the policies set out in CAMES, CAMCD, CAMMC1.	

General	Anything that can be done to prevent ruining the rest of Cam is a good idea. I fully support it and think the plan is a good idea. The landowners say Street Farm field is not tranquil or beautiful. This is just not true. It is a very peaceful and tranquil area. The only occasional traffic noise is from cars arriving in Old Court. The field itself is not beautiful but the views of the woods up to the golf course are beautiful all year round.	Designating Littlecombe Meadow and Street Farm Field Local Green Spaces. These affect me specifically because my house backs onto the field but I agree with all the other proposals as well. We need the space to stop us joining up with Dursley. Since my late husband and I moved here 18 years ago I have seen an increase in all kinds of people enjoying the footpaths through to the adjoining fields. My own grandchildren who have lived with me and attended Rednock School used the footpaths to walk to school and I walk my dogs in both areas daily.
LGS7 , LGS8, LGS9, LGS10	The plan is progressive , yet sympathetic to the essence of a green Village - please do not move back from these principles. In general ... we are delighted to see these as designated green spaces .they protect the heart of Old Cam ...we would advocate at all costs these are retained as present and future community assets . The risk that Green areas may be sacrificed in the future ... please do ensure we protect these community assets for all parishioners now and in the future .	As above , but in particular to preserve LGS7... the true community heart of Old CamSport is essential to form cohesive bonds to the community , both young, to develop and experience team games during and post school years and as a way to support and give back to the youth of the community through coaching and social networks .
P48	Local Greenspaces. We don't have enough of them, even considering close proximity to countryside.	Let's not lose any.
Policy CAM CF2 LGS designations; pp48-49	<p>I am strongly in favour of the inclusion of the land known as Riverside, Everlands Cam (LGS10) as a designated Local Green Space within the Cam NDP 2019-31. I have enjoyed visiting this land all of my life having walked across it countless times: when going to school at Cam Hopton in the 1970s and 80s, playing cricket and football as part of birthday celebrations, catching my biggest ever wild brown trout in 1988; walking along the old Dursley branch line whilst it was still accessible; paddling a canoe up the river from the area around the Scout hut; walking to and from church as a chorister and then later until this day; carrying out my dissertation on the impact of the Listers engineering factory when I was a student at GLOSCAT in 1989 (the water quality was surprisingly good) and on countless other occasions since.</p> <p>The landowners have expressed their concerns and objected to the designation and appointed a planning consultant, whose comments have appeared within the appendix of this draft NDC plan. I do not agree with the assertions made. To me, this area of land LGS10 fully meets all of the criteria for a designated Local Green Space.</p> <p>LGS10 is one of the most significant wildlife sites remaining within the heart of the village. Although the water vole that bred here became extinct in the 1990s, other key species such as grey heron and kingfisher remain and the increasing woodland is home to species such as tree creeper, nuthatch, chiff chaff and blackcap.</p> <p>The ancient veteran oaks have been designated with Tree Preservation Orders (TPO) for their amenity and historic value (the medieval / post-medieval tithe way from Norman Hill to St George's Church passes this land) and the broad-leaved woodland, scrub thickets, Cotswold riverside area and pockets of grassland and sedge fen provide a very diverse range of habitats uncommon in the parish which are home to many different animals and plants.</p> <p>It is true that the old railway line has become obscured by growth of trees and scrub but in places it is accessible and the old Gallows Bridge is a constant reminder of the historic importance of this part of Cam's industrial archaeology and heritage and it should be valued and protected. It is one of the longest remaining sections of this important part of our cultural heritage.</p> <p>With the recent Littlecombe developments and the Norman Hill housing estates being built from the mid 1970s onwards there are now perhaps 3,000 people living within a 10 minute walk of this very accessible green space. For successive generations of people, these represent the first field of real countryside that meet as they explore their parish as they should. It does have expansive views to Cam Longdown and Cam Peak and feels like a real gateway for people in the parish as they walk, run, cycle or ride towards the fields and hills that surround the village.</p> <p>Wildlife, heritage and accessibility - this site has everything and must be protected for future generations to enjoy growing up in this beautiful village as much as I did. Fortunately it meets the legal criteria and passes with flying colours.</p>	<p>The recent developments at Box Road have been a missed opportunity. I support s106 agreements that direct monies from each new house into biodiversity conservation, but by spending this outside the parish (within the Severn estuary SAC) rather than within Cam parish it feels as if yet again the amenity and heritage needs of Cam itself are not being adequately met.</p> <p>Governmental pressure will continue to be brought to bear on Cam for ever more houses, but I believe we are depauperate in our amenity given the massive development pressures we have faced since the 1970s.</p> <p>The people of places like Painswick and Rodborough always opined to Stroud District Council "Stick our district quota of houses in Cam". Rightly or wrongly that has always felt like a Council policy decision. Hopefully this draft plan is a vitally important step in a balanced and reasonable approach to our future needs.</p> <p>We need to develop spaces for nature within Cam which reach towards the Cotswold AONB and towards the Severn estuary RAMSAR site. This need not preclude further developments taking place, but it should be at the forefront of our strategic thinking and planning, not just an afterthought.</p>
Local Green Space	I strongly support the keeping of these green spaces that have childhood memories and especially Littlecombe Meadow where I now reside as I selected this location due to position to this green space, and the surrounding area.	

	<p>Much of your justification are lies or untruths. I have "managed" this piece of land (LGS10) since it came into the current ownership exactly 40 years ago and bred sheep on it for ~25 years. The field has never been used by the Scout movement in my time, however, i did have a request from a scout leader about 10 years ago asking if they could pitch their tents in return for keeping the land tidy, BUT this applied to the field north(next to the Scout Hut) of LGS10 which is not included in your draft. As i also managed this land i did get permission for them to use it but they never took it up anyway. With regard to a playing field, it has never been used as such, although i do remember asking someone riding a motorbike to leave. The pedestrian footbridge is complete! It is not a mature woodland, it was always a pasture meadow but in recent years the pollarded willows have seeded themselves and spread into the pasture alongside. There are many mature trees, bordering the disused railway line, now choked with ivy, that are likely to fall in a storm making these areas dangerous. There is an abundance of wildlife</p>	<p>Unless this area is cleared and made safe (even the ancient oaks regularly shed their branches and these would need to be fenced off) it is totally unsuitable as a Local Green Space</p>
CAM CF2 Local green spaces. especially LGs 55, LGS 10	<p>As children living at Sandpits more than 60 years ago, Holywell Orchard and the Riverside at Everlands were our natural playgrounds. Throughout my life, living in Cam, I have utilised these areas to walk my dogs, as walkways through to Cam village and of late, routes to run, as I endeavour to maintain my fitness. I fully endorse the application that these two sites in particular should be nominated as Green spaces to pass on to future generations for their enjoyment.</p>	<p>To make the Hollywell Orchard and the Riverside land at Cam, Local Green Spaces. I endorse the plan to maintain as much green space as possible in Cam to allow future generations access to play and leisure areas.</p>
Local Green Space	<p>Our house backs onto the River Cam and the green space between St Georges Close and Everlands. It is a beautiful area, full of large old trees and therefore many different varieties of birds including little egret, heron, kingfisher, great spotted and green woodpecker, nuthatch - to name but a few. Also, many different types of owl are heard. We also observe a fair amount of mammals including roe deer, muntjac, foxes, grey squirrels and also otters. All this beautiful, and increasingly rare, wildlife would be lost if this green area were to be developed in any way. One of the main reasons for moving into my house 30 years ago was this green space it backs onto and the abundance of wildlife it encourages. Leave the above area as is so that the residents, as well as future generations, can enjoy the nature on their doorstep. There is so much development countryside, surely one little pocket can be left to thrive.</p>	<p>N/A</p>
Local Green Space	<p>Speaking as firm supporters of LGS for Everlands 'Riverside', not only does this site provide habitat for native flora and fauna it is a tranquil space. We have read in some detail the objections posed by the landowners, and spokespeople on behalf of the landowners, who at face value have dismissed this space as not meeting the criteria. They are wrong. It may not be pretty, but is a much valued and needed space for health and wellbeing and in keeping with the rural nature of this community.</p>	<p>Necessity for green space whilst meeting demand for development. A fine balance must be struck to avoid Cam losing its rural identity. Implementation on the plan that has been proposed</p>
Littlecombe meadow	<p>Affecting our drainage and countryside views. Losing our lovely green spaces</p>	<p>None, keep our green spaces. Look for land further afield</p>
NDP/LGS - Everlands 'Riverside'	<p>We would like to further add that the mature trees that 'screen' this site, and give Everlands its unique character and appearance, are beautiful in their own right and therefore need protecting. It's interesting that the only objectors for this site being designated a LGS are the landowners. I wonder why..</p>	
CAMCF2	<p>I am heartened by the accurate descriptions of the cultural, natural environment, built environment, historical and economic context for the Parish of Cam. Our Parish is special and deserves protection from bland, destructive and careless local development. Policy CAMCF2 and the 10 Local Green Spaces chosen must be secured. Cam still has some ecological connectivity overall and strong connectivity for those sites lying close the river's course.</p>	
Page 48 policy CamCF2. Page 40 Cam Greenway	<p>We strongly support the designation of the Local Green Spaces proposed in the plan and the Cam, Uley and Dursley greenway. Apologies but did not have enough time to read thoroughly</p>	
General	<p>We think the plan has been thoughtfully and sympathetically put together and gives a very promising and positive outlook for the community of Cam. We are very lucky to be nestled between AONB and the green spaces dotted in between should be preserved. Cam sports ground, for example is a prime example of this. We need to treasure and celebrate these spaces, and the neighborhood planning group should be applauded for recognising this and the value it brings to each and every one of us.</p>	
Local Green Spaces	<p>The LGS areas as indicated in Figure 15 should all be kept as GREEN SPACES. LGS8, LGS9, and LGS10 are the nearest to all of the Littlecombe Development residents, and are natural wildlife habitats, unspoilt. They are accessible to everyone with public footpaths and well used. All of the LGS areas should be left as they are, i.e. not swallowed into residential development, amidst all the current, and large proposed developments within the Cam Parish Area. It would be seen as sacrilege not to preserve them.</p>	
General	<p>I enjoyed reading the NDP and whilst I oppose such large scale development in Cam, I hope that this NDP will force developers to build houses which are more in keeping with the character of Cam.</p> <p>I agree with the NDP in full and having read it through it made me realise that Cam is a very pleasant place to live. I agree with the NDP's Vision and Objectives for Cam and especially interested in ensuring that we retain our green infrastructure and Local Green Spaces. As a keen runner, I have used many of the Local Green Spaces and snickets throughout Cam. As an Upper Cam resident, I also use Littlecombe Meadow and Street Farm Field to walk to Dursley enjoying the green fields rather than busy roads. With the opening up of the Littlecombe estate, I am now able to walk to Dursley and enjoy the River Cam valley.</p> <p>It is really important that all new development has sufficient green open spaces to attract wildlife and provide play space including an obligation to plant trees. I also like the idea of a greenway which encourages people to walk and cycle.</p>	

Local green spaces LGS8 (Littlecombe Meadow) and LGS9 (Street Farm Field).	I feel that both LGS8 (Littlecombe Meadow) and LGS9 (Street Farm Field) are excellent proposals as local green spaces as they are adjacent to the large housing development of Littlecombe (where I live) and provide an abundant source of birdlife, wildlife (eg foxes), hedgerow and wildflowers for residents to enjoy. The footpaths through these green areas allow many people to enjoy all these things within these spaces. The areas also provide a sensible buffer between the built up nature of Littlecombe and the village character of Upper Cam.	I agree with LGS8 (Littlecombe Meadow) and LGS9 (Street Farm Field) being designated as local green spaces.
General	As I am a member of the NDP Steering Group, I agree with the NDP in its entirety. Like many parishioners, I am very much opposed with the large scale development envisaged for Cam because we do not have sufficient infrastructure in place. I am appalled by the recent development in Cam which is of poor design, lacking green spaces with a total disregard to the needs of wildlife, eg ripping out hedgerows in Box Road. The setting of Cam is beautiful and I like how the NDP recognises Cam's attributes with its Vision and Objectives. I fully support all of the nominated Local Green Spaces and regularly use Littlecombe Meadow and Street Farm Field in Upper Cam when walking to Dursley or taking my grandchildren to the park on Littlecombe.	I do not disagree with any items in the NDP. I propose that all the items included in the NDP are agreed to ensure that future development is more in keeping with the character of Cam.
Page 17 Figure 5 and page 49 Green space plan.	Page 17 Figure 5 Cam Plan Strategy Overview map indicates that the Local Green Space extends to the back of the property that abuts Springhill (incorporating the small allotment area). However, the plan on page 49 referenced LGS8 does not encompass the allotment area, which we consider should be designated a Green Space please, and so be reflected in the Figure 5 areas as well. We support the establishment of Green spaces to be protected.	Please incorporate the area of the allotment within the Green space allocation as noted above.
I would like to comment on LGS 8 Littlecombe Meadow & LGS9 Street Farm Field	These two attractive green spaces (LGS 8&9) provide an important divide between the older village areas of Cam and the new development of Littlecombe where I live. Both these green spaces support a huge amount of flora and fauna and are an absolute delight to walk through, which we do on a daily basis, as do many others living on the Littlecombe development and beyond. I feel that both these areas should be protected for future generations to enjoy and not built on.	I agree that LGS 8&9 should be designated as green spaces. "Both these green spaces support a huge amount of flora and fauna and are an absolute delight to walk through, which we do on a daily basis. I feel that both these areas should be protected for future generations to enjoy and not built on."
LGS8 & LGS9	These are references to sites identified in the development plan, LGS report. I have responded to the Stroud District Planners about the green space in upper Cam during the recent Public Consultation. I wish to simply reiterate them for the benefit of the local council. It is important to have some separation between Dursley and Cam and to retain the local character... The land at Street Farm and the adjacent Littlecombe Meadow need to be retained as green space. My full reasons have been to SDC.	
Local Green Space	Cam Sports Ground, Everlands-is an important easily accessible green space well used regularly by local sports clubs and informally by local people to exercise and enjoy. Annual events held here are enjoyed by many. Street Farm Field, Upper Cam-is an important green space between Upper Cam and the new development at Littlecombe allowing wildlife to thrive in an area where nearby fields have been built on in recent years. It allows for continuing separate identity of Upper Cam with its particularly attractive historical character.	
Page 49	I also agree with the green spaces identified, which I consider vital to preserving the character of Cam and habitat for wildlife. I consider the preservation of the riverside land at Everlands, Street Farm Field, Littlecombe Meadow, Hollywell Orchard and Cam Sports Ground of particular importance, so as to preserve the village feel of Upper Cam and the character of the wider area as a whole.	
LGS	For the local football club, local resident!	
LGS	One of the last remaining green spaces.	
LGS	Green space essential for youth sports development.	
LGS Report	Keep Cam Rec (Sports Field) as green space.	
LGS Report	Need green space. Used community for a long time.	
General	I agree with the plan because I want to save all the Local Green Spaces in Upper Cam. In particular Street Farm Field and Littlecombe Meadow should not be built on. All of the countryside around Upper Cam should be protected.	
21, LGS	Cam Sports Ground used by walkers, cricket, football, tennis players, children playing, dog walking, good views of surrounding area. Must be retained as a sports ground.	
LGS Report	Something the local area really needs to keep.	
LGS Report	Local Sports Clubs on site vitally important it remains a sports club and facility.	
LGS Report	Lack of green space in the area accessible to the community.	
LGS Report	Areas used a lot by the community.	
LGS Report	Sports club crucial to local area.	
LGS Report	Lack of green space in Cam area. I want to keep the recreation field as an area for sports and public use.	
LGS	Lived in Cam for 9 years and have seen many changes. Many green fields have disappeared for houses being built so we must keep our green spaces that's left for people and wildlife to enjoy for the future. B Minns	
LGS	I have already commented on the green spaces on the online questionnaire but I think the local green spaces are incredibly important particularly as more and more of Cam is developed. We have to protect the green spaces which exist between the different areas of Cam and Dursley otherwise we risk becoming like places such as Yate/Chipping Sodbury.	
Draft Local Green Space Report P24-P25	Street Farm-Support proposal. Important as part of green space between Cam and Dursley. Important for walkers and wildlife	Definitely make it a designated Local Green Space.

Draft Local Green Space Report P24-P25	Street Farm-Support proposal as will form important green space separating Upper Cam from Dursley. Important recreational area for walkers with and without dogs and good for wildlife-badgers, deer etc often seen.	Make it a designated local green space-it always used to be agricultural land!
LGS7 , LGS8, LGS9, LGS10	In general ...we are delighted to see these as designated green spaces. They protect the heart of Old Cam...we would advocate at all costs these are retained as present and future community assets.	
Pp 48-49	Local Green Space 8 Littlecombe Meadow, We agree that this must be maintained as a Green Space and not developed . When the Littlecombe development was first planned we were given a promise that there would remain a gap between the development and Upper Cam, so that Upper Cam retained its village character and was not swallowed up. The space is also very valuable as a recreational place for dog walking etc. and as a wildlife corridor away from block paving etc.	
General	I have read the draft and agree and accept the contents of all the Local Green Spaces that have been put forward in the NDP. Keep our green spaces please.	
P49	LGS7- Lots of local elderly people use this space as it is accessible on scooters and wheelchairs. Also well used by children and sports. Support it being a open green space. There is nowhere else between the centre of Cam that is green space.	
LGS	I am very concerned about the local green spaces being built on. These spaces even small are very important to everyone. Dog walkers, children etc. But for older people who are unable to walk or travel out of Cam this is their only means of seeing wildlife etc. There are many children and others who live in flats that have no gardens.	Stop any building on these spaces.
Pp48-49	Local Green Space 9 (Street Farm Field): We agree that this must be maintained as a Green Space and not developed. When the e agree that this must be maintained as a Green Space and not developed. When the Littlecombe development was first planned we were given a promise that there would remain a gap between this development and Upper Cam, so that Upper Cam retained its village character and was not swallowed up. The space is also very valuable as a recreational place for dog walking etc. and as a wildlife corridor away from block paving etc.	
Pp48-49	Local Green Space 10 Riverside land at Everlands.We agree that this must be maintained as a Green Space and not developed; it could be also utilised to allow the cycle way to avoid some of the road section along Everlands. The space is also very valuable as a recreational place for dog walking etc. and as a wildlife area, given that many of the long gardens on Everlands have now been built on.	
General	The Cam Sports Field at Everlands provides sports facilities to three different clubs with countless members if you include the youth clubs. It simply can't be built on, it would have a massive negative impact on the local community.	
Appendix 8 Local Green Spaces	I support completely all the areas listed for the allocation as local green space. They are very important for our wildlife etc.	
Appendix 8 Local Green Spaces	I believe that it is important to protect our green spaces and I feel that all the areas listed should be designated as local green space	
General	I am a member of the Cam Football club and feel that Cam Sports Field in Everlands is a valued green space and allows sports to be played within walking distance and my children also enjoy playing there as they feel safe and it is a great area for them to enjoy.	
General, Local green spaces	As I am completely against any unnecessary development on non-strategic sites I agree 100% with the proposals within the plan. In 2005 an enquiry into the mixed use development on the "old" Listers site stated that the eastern slopes of the escarpment should remain development free. In 2016 a Planning Inspector dismissed an appeal on land at Street Farm stating "Nevertheless, together with the open space provided for the new development which adjoins it on the western side, it provides a significant and pleasant green wedge or gap separating the older and new housing, contributing to the village-like character of Upper Cam." Many people enjoy this green gap, used daily by dog walkers, rambblers and residents. It also provides an off road public right of way leading to the AONB and surrounding countryside. Therefore Street Farm Field, Littlecombe Meadow and Riverside should be afforded the protection of the local green space designation in Cam's Neighbourhood Development Plan.	
Page 49	The proposed Green Spaces are fairly well spread out on this map. I would argue that Street Farm Field and Littlecombe Meadow need to be one area as a whole but as they are visually different and have different usage, and are owned by different landowners maybe this is why they are depicted as 2 currently. The eye is drawn to this, whereas the others are spaced out. (I note they are wrongly labelled but as an NDP member I have mentioned this to be amended). I am very much an upholder of green spaces as we are now in an ever faster and busy world. When our mental health and wellbeing are being challenged by this and currently this is the subject of much talk, these are areas that should be regularly spaced in a community for everyone to enjoy and sometimes congregate ie Cam Sports Ground.	Maintenance of current green spaces and there is opportunity to create even improved spaces in new development, once again to provide wildlife corridors in a country village setting.
12941	The ground is well kept and with the chestnut trees provides a tranquil setting.	
12942	It has been the home of Cam Cricket Club since 1923.	
12943	Cam Sports Club is the home of Cam Cricket which runs 3 senior teams and has a very strong junior development section. Cam Football Club has 3 senior teams . Cam Tennis Club which runs 3 mens and 3 ladies teams in summer and 4 mixed doubles in winter leagues and is looking to start a strong junior section again.	
Page 48,012	The clubhouse facilities at Cam Sports Club are in need of major refurbishment/in need of rebuild. We have concerns that being listed under Local Green Space designation may prevent these future required plans from occurring.	Ensure that sports facilities can be rebuilt if required.
48	I am very pleased that Cam Sports Ground is recognised as a designated Green Space. The only concern I have is that the facilities there badly need a financial influx to allow them to continue. Income from membership is not sufficient to cover re-build costs. It would be helpful if funds could be found to assist with both maintenance and rebuild of the clubhouse facilities. My family have used the facilities provided by tennis, cricket and football at this venue for more than 25 years. I am relieved that this will not be considered for new build.	

48 LGS 7,8,9,10	Protect Green Spaces, sport for all good places for dog walkers quiet area close to homes LGS-Home for a diverse group of animals plus a number of butterfly species.	
	<p>As Chairman of Cam Cricket Club I feel the need to contribute to the discussion on the local in fact only green area/ space left in the heart of Cam.</p> <p>As a Cricket Club we are all extremely proud on a summer Saturday, many people from the village support our teams, and use the club. The position is idyllic and we are all proud of where we play, and, most importantly none of us want to lose it for housing, especially when many new estates are being built around our station area.</p> <p>The facility is used year round by all ages, from youth under 9s playing all stars cricket on a Friday, to senior citizens playing tennis year round. Not to mention Cam Bulldogs FC whose players take pride in representing Cam especially with Dursley town being refurbished their loyalty has been outstanding.</p> <p>To lose this special green area would be nothing short of criminal, the residents of Everlands want it to stay as a green area, as do all the members of Cam Sports Club, I am sure you all agree it is situated in a lovely part of our village and long may it remain so .</p>	
Page 48	We absolutely support this policy for all of the Local Green Spaces to protect wildlife and habitats, as well as the recreational sites and sport facilities. Sites such as Littlecombe Meadow , Street Farm Field and Riverside, Everlands are vitally important as Local Green Spaces in order to protect species but also for the enjoyment of the community-these spaces also serve to promote good mental health and a sense of well being. There has been a notable increase of people out and about using these lovely areas lately. The playing fields and sports ground have huge physical and social benefits. Finally, we would just like to say that we support the whole plan with it's green focus, the promotion of cycling and walking routes and the overall wellbeing of the community. At a time when environmental issues have become so critical.	
page 17/60	We notice with satisfaction that the fields alongside Hopton Road which provide rural separation between the two Cam parishes, are clearly designated as "Local Green Space". We strongly support the retention of this designation in the context of much local concern about the future of these fields.	
	Would vote for the plan in the future though I worry about the influx of people on all the existing services. I commented on the online questionnaire about protecting the local green spaced in Upper Cam and want Street Farm Field which adjoins my property saved. It is a haven for wildlife and we walk our dog daily across the footpath together with many others. It's used regularly by runners and walking groups and it's the last piece of green between us and the Littlecombe Estate.	
	I agree with everything my wife has said above especially about saving Street Farm Field for the future inhabitants of the village.	
Policy CAMCF2	Policy CAMCF2 support. Projects	
P48 CAMCF2 LHS9	This green space is the natural habitat for vast amounts of wildlife. It is also used regularly by ramblers and dog walkers	

Cam Parish Council Office,
4 Noel Lee Way,
Cam,
Gloucestershire,
GL11 5PS

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: 01260 288800
F: 01260 288801

www.gladman.co.uk

By email only to: admin@camparishcouncil.gov.uk

9th July 2019

Re: Cam Neighbourhood Plan Regulation 14 Consultation

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Cam Neighbourhood Plan (CNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation and examination of numerous plans across the country, it is from this experience that these representations are prepared.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in §8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the CNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- (d) The making of the order contributes to the achievement of sustainable development.
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.
- (g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced

previously through the Housing White Paper. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.

§214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Submission of the CNP will ultimately occur after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018 and corrected in February 2019.

National Planning Policy Framework and Planning Practice Guidance

On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy. The Revised Framework sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

"The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

Paragraph 14 further states that:

"In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;**
- b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;**

c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and

d. The local planning authority's housing delivery was at least 45% of that required over the previous three years."

The Revised Framework also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority. With respect to the situation in Bedford Borough, it should be borne in mind, the significant change that the revised NPPF has brought about for planning locally, with particular regard to the larger housing requirement under the standard method.

In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

Planning Practice Guidance

Following the publication of the NPPF2018, the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.

Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the

policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan¹. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.

It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises that;

".... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence."²

It is with that in mind that Gladman has reservations regarding the CNP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

To meet the requirements of the Framework and Neighbourhood Plan Basic Conditions, neighbourhood plans should conform to the strategic policy requirements set out in the adopted Development Plan. That relevant to the preparation of the Cam Neighbourhood Plan and, against which the CNP will be tested, consists of the Stroud District Local Plan (SDLP) (2015). The SDLP sets out the vision, objectives, spatial strategy and overarching policies to guide development in Stroud District up to 2031.

Stroud has committed to an early review of the Local Plan, consulting on its Regulation 18 Emerging Strategy which ended in January 2019. The Local Plan Review will meet some needs of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Area. The level of growth that Stroud will accommodate will remain unclear until the examination into the JCS has concluded (date yet unknown). It is therefore important that the CNP provides flexibility to ensure that the policies it contains are not overridden upon the adoption of any future Local Plan; as section 38(5) of the Planning and Compulsory Purchase Act 2004 states:

'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'

¹ PPG Reference ID: 41-009-20160211

² Paragraph: 044 Reference ID: 41-044-20160519 (Revised 19/05/2016).

Cam Neighbourhood Plan

This section highlights the key issues that Gladman would like to raise with regards to the content of the CNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of modifications to the plan to ensure compliance with the basic conditions.

Policy CAMES1 - Green Infrastructure and Biodiversity

CAMES1 supports development proposals which demonstrate how Green Infrastructure networks and assets will be harnessed and enhanced. The policy would appear to function for the purpose of achieving environmental benefits from large-scale greenfield applications. However, as written the policy risks sweeping up all types of development proposals including change of use and small residential developments on brownfield sites.

Whilst Gladman appreciate that GI improvements can be achieved via off-site contributions as well as on-site, the policy would benefit from the application of a threshold or the specification of which type of planning application the policy would apply to.

Policy CAMES2 - Protection of the Setting of the AONB

CAMES2 restricts development at locations which contribute to the setting of the Cotswold Area of Outstanding Natural Beauty, as identified in the Cam Landscape Sensitivity Assessment (2018). This evidential document outlines the following definition, but does not identify a boundary for the setting:

“The Board considers the setting of the Cotswolds AONB to be the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB.”

Whilst we appreciate that the Cotswolds AONB Board defines the setting of the AONB as above, there is no map in the evidence base which marks out any such boundary. Gladman would dispute that a defined setting can be attributed to the AONB in this or any other location. A similar argument was put forward by residents against the residential development at Bath Road, Leonard Stanley which sits below the Cotswold escarpment and is also part of the AONB.

In that case, the scheme was found, at appeal (PINS ref: 2207324), to be set within the context of the existing built-up area and was therefore allowed. Clearly, each planning application is, and should be, decided on a case-by-case basis. However, it is noted that the ‘setting’, which is labelled on the CNP Figure 8, but is still not delineated, would likely be subject to intervening vegetation, buildings, contours and elevations. Furthermore, as in Leonard Stanley, new development would be seen within the context of the built-up area. Clearly, each application should be accompanied by a Landscape Visual Impact Assessment, prepared with reference to the

Cam Landscape Sensitivity Assessment and then, decided on the basis of the unique circumstances of the location. However, as written, the policy would contravene basic condition (e).

Policy CAMES3 - Landscape and Locally Valued Views

This policy identifies 8 'valued' views which the plan makers consider are important for the setting and character of Cam. Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view's importance beyond simply being a nice view of open countryside. The evidence base to support the policy does little to indicate why these views are important and why they should be protected, other than providing a view of the surrounding fields and woodland. It therefore lacks the proportionate and robust evidence required by the PPG.

In addition, as set out in case law (Stroud DC v Secretary of State for Communities and Local Government [2015] EWHC 488; paras 13-16, 18), to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contain physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support.

Opinions on landscape are highly subjective, therefore, without much more robust evidence to demonstrate why these views and landscape areas are considered special, the policy in its current form will likely lead to inconsistencies in the decision-making process.

We submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views.

Gladman therefore suggests this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework and basic conditions (a) and (d)

Policy CAMCF2 - Local Green Space Designations

This policy seeks to designate ten parcels of land as Local Green Space (LGS). In order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements as set out in the Framework. The Framework makes clear at §99 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development.

§99 states that:

'The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement

investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.'

Further guidance is provided at §100 which sets out three tests that must be met for the designation of LGS and states 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, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.'

The requirements of the Framework are supplemented by the advice and guidance contained in the PPG. Gladman note §007 of the PPG8 which states,

'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'

Gladman further note §015 of the PPG (ID37-015) which states, '§100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.'

Designation of LGS should not be used as a mechanism to designate new areas of Green Belt (or similar), as the designation of Green Belt is inherently different and must meet a set of stringent tests for its allocation (§135 to 139 of the Framework).

Gladman do not believe that CNP supporting evidence is sufficiently robust to justify the proposed allocation of LGS8 - *Littlecombe Meadow* and LGS9 - *Street Farm Field* as LGS, given their lack of particularly special features.

The issue of whether LGS meets the criteria for designation has been explored in a number of Examiner's Reports across the country and we highlight the following decisions:

- The Sedlescombe Neighbourhood Plan Examiner's Report recommended the deletion of an LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.
- The Oakley and Deane Neighbourhood Plan Examiners Report recommended the deletion of an LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.
- The Alrewas Neighbourhood Plan Examiner's Report identifies both proposed LGS sites 'in relation to the overall size of the Alrewas Village' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.

Highlighted through a number of Examiner's Reports set out above and other 'made' neighbourhood plans, it is considered sites LGS8 and LGS9 have not been designated in accordance with national policy and guidance and subsequently are not in accordance with the basic conditions.

Whilst the Parish Council have sought to undertake some form of evidence base it does not overcome the failure to meet the specific policy requirements set out above with regards to the scale of land to be designated. In terms of meeting the second test there is no evidence base to support all designated LGSs being 'demonstrably special to a local community.' In relation to their beauty, most are of no particular scenic quality and have not been made in accordance with basic conditions (a) and (d). Gladman therefore recommend that the LGS Policy be revisited to ensure the designations are compliant in their entirety.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the CNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and (d) the making of the order contributes to the achievement of sustainable development for the reasons set out above and (e) is in general conformity with the strategic development plan policies. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,

Paul Emms

Gladman Developments Ltd.

**Response to Draft Cam Neighbourhood Plan (V7) regarding a proposal to
designate a Street Farm field as a Local Green Space (labelled LGS 9)
by Peter Whitton and Judi Whitton, Street Farm, Cam, GL11 5PG**

Site location and Description

The Street Farm field (referred to as the SF field below) is located at the extreme south east corner of Cam and abuts the Parish boundary. It is situated outside of the settlement development limit.

Its setting is shown in the aerial photograph attached. To the east it is contiguous with open land which stretches to the AONB and in part abuts four houses in a cul de sac, Springfield Old Court, which is a finger protruding into the wider countryside.

To the west it abuts a field referred to as Littlecombe Meadow in the draft Cam NDP. Littlecombe Meadow is also outside of the settlement development limit.

To the north is remainder of the Street Farm field for which LGS status is not proposed.

The boundary between the parishes of Cam and Dursley is on its southern boundary.

The Street Farm field has been divided into 3 sections by 2 fences for some 30 years and the proposal in the draft Cam NDP is that two of these smaller areas are designed as a Local Green Space (LGS)

The Street Farm field is private land to which there is no legal access. The field has been used for cattle, sheep and mown for hay by the present owners of Street Farm over the last 35 years. In recent years the land has been untended. Throughout this time the land has not been used by the public. Indeed fencing across the two of the 3 field sections would make these respective areas difficult to access

The most southerly section of the land is crossed by 3 public footpaths. These link Springfields Old Court and the open fields to the east of the SF field to the field referred to as Littlecombe Meadow. Littlecombe Meadow is a designated open space in the Masterplan for the Littlecombe Estate.

The basis of the proposal for LGS designation

We were advised on 18 October 2018 that the NDP Steering Committee had nominated the SF field as a LGS and intended to seek community views.

After unsuccessfully pressing Mr Gowcutt, Chairman of the Steering Committee, for details of the assessment that resulted in nomination and the process involved, eventually on 30 November the Chairman of Cam Parish Council responded.

He confirmed that the SF field had not been identified in a long list of 41 possible green spaces and did not appear in the short list of sites to be further considered. No rationale or criteria for the selection of the site by the Steering Committee were given and no explanation for how the field came to be nominated after a extended process involving both long listing and short listing were given.

He confirmed that the NDP Steering Group had nominated the SF field 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 National Planning Policy Framework and relevant Planning Practice Guidance notes that LGS designation should only be given where the green space holds a particular significance and is special to the community, including

- Sites of significant recreational value (including as a playing field)
- Sites of locally significant beauty

Against these statements, nomination against recreational value merely on the basis that an otherwise private field has rights of way must be judged a remarkable decision by the Steering Committee

Nomination by claiming it as pleasant gap between the urban area of Cam and the countryside when it is bounded by open space on three sides and the Parish boundary between Cam and Dursley on the fourth is false. The urban area of Cam is to the north and North West of the land. The claim that the site has locally significant beauty is not sustainable

In neither case is the requirement that “the green space holds a particular significance” established. The community consultation in 2016 failed to identify Street Farm for consideration and the decision by the Committee to nominate the land at a late stage raises questions about the process being followed. The process of site selection and evaluation undertaken by the Steering Committee is discussed further in a section below

Response to public Consultation October/November 2018

Point by point responses to the comments recorded from the public consultation in October/ November 2018 set down in the Local Green Space report are given in the table below

The general conclusion is that none of the comments and views made in the public consultation provide evidence that the field has particular significance and is special to the community. Many of the responses made could be made equally about the adjacent fields or other fields in the area.

18 responses against LGS designation were recorded. This is between 3 and 10 times more than were recorded against any other nomination and is more than the number who supported some of the other nominations. The number against is perhaps a reaction to the pressure applied to comment in favour of LGS by two of the Steering Committee members. This is described in the section on process below

Process

We understand from the letter received from the Chairman of the Cam Parish Council on 30 November 2018 that the process followed by the NDP Steering Committee was to form a long list of all possible suitable open spaces. 41 possible green spaces were identified. The Street Farm land was not on this list even though it is a large tract of land (more than 1 hectare). This is in line with the fact that it is outside of the settlement development limit and is private land with no public access and already subject to restrictions from policies in the Stroud Local Plan. These factors would have been expected to screen it out from further consideration.

The criteria used for shortlisting from the long list are not completely clear but resulted in the original list being reduced. We understood that it was reduced to 6 but the letter from the Chairman of the Council asserts that it was 12.

Sometime afterwards much to our surprise the Street Farm field was added to the list. 3 other parcels of land were added to the shortlist over time. These three were all open public spaces and relatively small so perhaps arguably easier to miss in the long listing process.

The addition of the SF field is a consequence of the actions of two members of the Steering Committee who joined the committee after the initial listing and evaluation process had been completed. Janice Evans lives in one of the 4 houses in Springfields Old Court that back onto the Street Farm field. Moira Woodward lives nearby in Springhill. Janice Evans and Moira Woodward led a vitriolic and personal campaign to stop approval being given when planning permission was sought on the Street Farm land in 2014. They, along with Keith Scott, also a member of the Steering Committee, are specifically mentioned as witnesses in the Appeal Inspector report (APP/C1625/W/15/31395860).

In her zeal to ensure that nothing is built anywhere near her house, Janice Evans, supported by Moira Woodward, has been vocal in pushing for the Street Farm field to be added to the list of proposed green spaces. When asked directly, Mr Gowcutt, the chairman of the Steering Committee, has been unable to confirm that Janice Griffiths and Moira Woodward had been excluded from discussions of matters regarding Street Farm. The letter received from the Chairman of Cam Council on 30 November 2018 similarly does not confirm that they were not allowed to influence the committee.

Whilst as Committee Members they should have stayed neutral, both ladies have been active in seeking comments from local residents to support their aim of securing a LGS nomination for the SF field.

We understand the required protocol for the creation of a Neighbourhood Plan is the same as that expected in putting together a District Plan regarding involvement of those with a vested interest. This protocol has not been followed and for this reason alone the nomination of the SF field for LGS designation is seriously flawed and we believe should be withdrawn.

The definition of the boundaries of the land suggested for designation appears arbitrary. The land selected is a contiguous part of a much larger area of land to the east, west and to a small degree to the north, all of which is outside of the settlement development limit. This single larger parcel of land was labelled Area A by Potterton Associates in their Landscape Sensitivity report and considered as a single piece of land. The nomination of part of the SF land appears illogical and unsupported.

The SF land is outside of the settlement development limit and subject to the relevant policies in the Stroud District Local Plan. Policy CP15 contains policies for the protection of the beauty of the countryside and only supports development in very special circumstances. The rejection of a planning application on the SF field and, support for this rejection at a subsequent Appeal in 2016 specifically because it does not satisfy the conditions for development included in CP15, provides evidence that adequate protection for the land is in place. The PROWs across the land are also protected by legislation. We do not believe that a defensible case has been made by the Steering Committee that our land should be singled out for LGS designation. However even if this were the case it is adequately protected by the policies of the SDC Local Plan.

More generally it is clear that a methodology with clear criteria that show the nominations are 'demonstrably special' and fit the Cam Vision, with evidence assembled which shows this is the case has not been in place. The nomination process of the SF land appears to be driven by the strong views of two members of the committee. Evidence that the land satisfies the requirements of the NPPF PPG has been provided - comments from local residents do not of themselves provide the evidence required to satisfy the requirements of the NPPF PPG.

We suggest that the nomination and evaluation of our land as an LGS did not arise from a proper process but was in fact driven by the vested interests of two members of the Steering Committee and that its designation is open to challenge.

We continue to object strongly to the nomination of our land as a LGS and are disappointed that a transparent fair process has not been followed.

Conclusions

The process adopted by Cam NDP Steering Committee to identify and select spaces for nomination as a LGS has not followed a robust independent methodology with clear criteria for determining whether the land has a particular significance.

SF is private land with no general public access. No evidence has been presented that the area has characteristics which make it demonstrably special. Public consultation has attracted more people against the nomination than any other LGS nomination in Cam, indeed more than are in favour of some of the other nominations. Many of the comments made in response to the 2018 consultation could be made equally for several areas of land nearby and have not demonstrated that the SF land is special to the community. The selection of the SF land itself appears arbitrary. The boundary could equally have included the field to the east... and the field beyond that.

Both the nomination by the Steering Committee and the public consultation have been heavily influenced by two members of the Steering Committee with a vested interest. The garden of one of these ladies abuts the SF field. Both have a history of vitriolic objection to a previous planning application made in 2014 and have been zealous in seeking support for the nomination of the SF field. Their influence on the deliberations of the Steering Committee do not align with the proberty expected of a properly constituted Committee of Cam Parish Council charged with acting for the common good. The validity of the LGS nomination and its evaluation are very questionable

The rights of way across the land are protected by legislation and the land is protected by the policies in the Stroud Local Plan as it is outside of the Settlement Development Limit. This protection is long lasting. The rejection of a planning application both by Stroud District Council and on Appeal (in 2016) evidences that the land is in any case not in need of any further protection.

Table of responses:

LGS8 – Street Farm field. Comments on public consultation comments reported in Green Space Plan	
Description	Using the same description as an ‘Open Green Space’ as is used for Littlecombe Meadow is misleading as it is private land which is not open for any community use, whereas Littlecombe Meadow is indeed green space open to the public
Reasonably close proximity to community	It is not surrounded by residential development as described. There is open land to the east and to the west and to a small extent to the north
Planning Context	Policy CP15 of the Stroud District Local Plan already contains policies for the protection of the intrinsic beauty of the countryside and only supports development in very exceptional circumstances. The rejection of a planning application on the SF field and support for this rejection at a subsequent Appeal in 2016 demonstrates clearly that the land is adequately protected already.
Demonstrably special to the community and holds a particular significance	<p>The PPG stresses that the land must hold <i>particular</i> significance and be <i>special</i> to the community</p> <p>It is noted that 18 responses were against designation as an LGS. This is between 3 and 10 times more than recorded against any other nomination and is higher than the number who supported some of the other nominations.</p> <p><u>Beauty</u> importantly <i>none</i> of the consultation responses refer to the land having significance as a ‘green gap’ which was given as a reason for nomination of the land by the Steering Committee</p> <p>regarding the comments themselves: ‘A green area clearly visible from Stinchcombe Hill’ is not true. The land is some 2 miles distant at the far side of a valley filled with houses. It can barely be discerned in the landscape without the aid of large telephoto lens and is not of particular significance . ‘Great views towards the AONB and Stinchcombe Hill’ Such views are a feature of all the fields, PROWs and many roads nearby. ‘Beautiful wildflowers’ The land has not been mown recently or had cattle on it. This is not of reason for designation of a field ‘Land not beautiful’ Agreed</p> <p><u>Historic Significance</u> ‘A field for hundreds of years’ Most have been. Not a basis for making it an LGS ‘Public footpath used by Listers’ workers’ Not of particular significance or a basis for LGS designation. Nearly all PROWs were used by workers. PROWs are protected anyway so LGS designation is not appropriate</p>

Commented [PW1]:

	<p>'No historic significance' Agreed</p> <p><u>Recreation</u> 'Walkers use the footpaths' ' Popular with dog walkers' This doesn't make the land special requiring LGS designation 'Footpaths used as shortcuts' As they are PROWs this right is already fully protected and in any event not a reason for designation ' Lack of recreational use' Agreed. It is provate land with no lawful public access.</p> <p><u>Tranquillity</u> 'Peaceful area linking the Littlecombe Estate/countryside and providing space between Dursley & Upper Cam' Access is only on the PROWs which are comparitively short. Not special or a basis for designation 'Away from Roads' It is part of the countryside as are the fields to the east and west. Not a basis for designation 'Not tranquil' Agreed. No more tranquil than anywhere else in the immediate vicinity.</p> <p><u>Wildlife</u> 'wildlife haven and corridor' Environmental assessment undertaken as part of S.14/2438/FUL confirmed that not a habitat for any unusual or protected species. Wildlife corridor is also enabled by hedgerows. Not special or a basis for designation 'Established flora' This is agricultural field and liable to be mown. Not a basis for designation 'Badgers etc etc seen in the space' Also seen in surrounding fields and gardens. Not a basis for designation 'Birds including owls, buzzards and kites' Are commonly heard and seen in the surrounding area. No basis for designation 'No special wildlife value' Agreed – it is pleasant but not special and not unusual in the area</p>
--	--

Street Farm field and Environs



AONB

Springfield
Old Court

Street Farm field

"Littlecombe
Meadow"

Littlecombe
Estate



CAM PARISH NEIGHBOURHOOD DEVELOPMENT PLAN

Hard Copy Comments on Regulation 14 Draft for Public Consultation

Any and all interested parties are invited to comment using this form.

Each different comment on a different aspect should be in a new row. All contact details will be treated in complete confidence and not shared with any others.

Please post your comments to 4 Noel Lee Way, Cam, Glos, GL11 5PS. If you wish to email comments, please send to clerk@camparishcouncil.gov.uk

Name (+ any person or organisation you represent) and contact details including post code#	Plan page and para.*	Comment	Any proposal to deal with comment made
Mr Daniel Drayton LPC (Trull) Ltd on behalf of Mrs Wendy Ghaffar and Mr Ian Harris	CAMCF2	Please see attached letter	Please see attached letter

For purposes of clarification and feedback only

* Sufficient to identify the commented point precisely



TOWN AND
COUNTRY
PLANNING
DEVELOPMENT
CONSULTANTS

25 July 2019

Our Ref LPC.DJD.4570

Cam Parish Council Office
4 Noel Lee Way
Cam
GL11 5PS

Dear Sir or Madam,

**Cam Parish Neighbourhood Development Plan 2019 – 2031
Regulation 14 Consultation Draft Version**

I am writing on behalf of my clients Mrs Wendy Ghaffar and Mr Ian Harris in relation to the above Regulation 14 Consultation. Specifically, I am writing in response to proposed policy CAMCF2 Local Green Spaces, together with the evidence document Local Green Space Report Draft and appendices. As set out in my letter to you dated 14th January 2019, my clients own the land proposed as a Local Green Space identified under Policy CAMCF2 as site LGS10 Riverside, land at Everlands. My clients maintain their objection to this proposed allocation on their land for the reasons given in my previous letter.

I note that the draft version of the Neighbourhood Plan proposes to allocate this land at Everlands but it does not provide a response to the observations raised in my letter.

I have reviewed the relevant documents for this consultation, and I note that the Local Green Spaces Report provides the evidence base for policy CAMCF2. This contains a large amount of information based on questionnaires carried out in 2016 and again in 2018/19. Whilst the views and wishes of residents are valuable, I wish to take this opportunity to remind the Parish Council that the Neighbourhood Plan should also be based on factual information and empirical evidence.

Concerningly, the methodology for the selection of local green spaces in the Green Spaces Report appears to be based on the quantity of supportive comments in the questionnaires, without any assessment of their accuracy of factual validity. It seems to me that the Council have simply counted the number of supportive responses with a brief summary as providing the justification for the site's allocation against paragraph 100 of the NPPF. In opinion this is unsound plan-making and is the reason why I have sent a copy of this letter to the Neighbourhood Planning Officer at Stroud District Council.

LPC (Trull) Ltd
Trull Tetbury
Gloucestershire
GL8 8SQ
Tel: 01285 841433
Fax: 01285 841489
www.lpctrull.com

To demonstrate my point, I have myself undertaken a brief analysis of the online questionnaire responses to 2018/19 which are provided at Appendix 4 of the Green Spaces Report in response to the proposed Everlands site.

Beauty

- Riverbanks
- Oak trees
- General benefit of green space, well being
- Wider benefits to the town
- Walking along the riverside

The above comments are based on a fundamental misunderstanding that the land is publicly accessible. Whilst a public footpath crosses the land, this does not run parallel with the river bank, nor does it include the majority of the site to the north. Additionally, the landowners have stated that there are only four oak trees on the site and these are located close to the public right of way at the site's southern end.

Historic Significance

- The line of the old Dursley Donkey railway used to run along the edge of the land
- The Oak Trees have historic significance
- The former pedestrian bridge has historic significance

As pointed out in my previous correspondence in January, whilst the land may have included a railway line, this has now been subsumed by the landscape and provides no historical significance. Part of the former pedestrian bridge remains, but this is localized to a relatively small area in the southern part of the site. These are not sufficient factors to award the site any special significance.

Recreational Use

- Dog Walking
- Play area for children
- Fishing
- Blackberry picking
- Wildlife Watching
- Used to be used for cricket and football

Whilst the land may have been publicly accessible in the past that is no longer the case. In my view therefore the above recreational activities are therefore no longer possible without the consent of the my clients as the landowners. (Indeed, the landowners have no recollection of either football or cricket being played there in living memory).

Tranquility

- Shading of trees
- Sound of the river
- Acts as a buffer between suburban development

Whilst the site has a tranquility to it that contrasts with the surrounding build up areas, these respondents fundamentally misunderstand that a local green space designation is not intended to be a land use tool to achieve spatial separation, such as Green Belt.

Wildlife

According to the questionnaire responses, the following have been observed by residents within the site

- birds
- deer
- fish
- bats
- owls
- kestrels
- foxes
- badgers
- otters
- herons
- toads
- squirrels

However, there is no empirical evidence to support these claims as no survey of the land has been carried out. Whilst these species may have been seen on the land, there is no evidence that the site provides any long term habitat for these animals.

Conclusions

Overall, having reviewed the Neighbourhood Plan evidence base for Local Green Spaces I am significantly concerned about the processes used to justify the Parish Council's site selections. These appear to be based on the number of supportive comments received irrespective of whether these comments are based upon fact or are consistent with paragraph 100 of the NPPF. In my view this is highly unscientific and unsound. Consequently, I have sent a copy of this letter to the Neighbourhood Plans Officer at Stroud District Council.

Yours sincerely,

Daniel Drayton
Associate
LPC Ltd

cc Neighbourhood Planning Officer, Stroud District Council
Mrs Wendy Ghaffar
Mr Ian Harris

14 January 2019

Our Ref LPC.DJD.4570

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

Dear Councillor Grocutt,

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

I am writing on behalf of my clients Mrs Wendy Ghaffar and Mr Ian Harris 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 Mrs Ghaffar 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

LPC (Trull) Ltd
Trull Tetbury
Gloucestershire
GL8 8SQ
Tel: 01285 841433
Fax: 01285 841489
www.lpctrull.com

“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,

Daniel Drayton
Associate
LPC Ltd

cc Mrs Wendy Ghaffar
Mr Ian Harris

3 Nab Wood Drive
ShIPLEY
West Yorkshire
BD18 4HP

Cam Parish Council
4 Noel Lee Way
Cam
GL11 5PS

25 July 2019

Dear Sir/Madam,

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 that the land we own at Everlands, referred to in your letter as 'Riverside' has been nominated as a Local Green Space and included in the draft neighbourhood plan.

We are writing again to express our **objection to the proposal that the site at Everlands be nominated as a Local Green Space**. We refer you also to the three letters sent to the council in November 2018, and the letter supporting our objection as set out in the letter from the Town and Country Planning Consultants, Mr Daniel Drayton in January of 2019.

This week Mr Drayton has written a further letter to yourselves and Stroud District Council outlining concerns about the process followed in developing the Local Green Space report and subsequent plan. There is a clear lack of factual information and empirical evidence to support the nomination of our land. Mr Drayton did raise these concerns with Cam Parish Council back in January of this year but received no response to the specific concerns about the process followed.

We would like to also draw your attention to some factual inaccuracies in the Local Green Space Report and outline these below. These need to be considered together with the comments in the letter from Mr Drayton in January and July of this year.

Local Green Spaces Report Draft

Pg. 28 of the plan- **LGS10 – Riverside, Land at Everlands - Key Information**

Pg. 28 - statement that the land is '**surrounded by residential development**'. This description is not entirely accurate. On one side of the land is the road known as Everland's and there are houses on the opposite side of the road, at the far end of the land is the St George's estate. The majority of one side of the land has

adjoining fields and at one end of the land there is a further stretch of land that continues along the river Cam but has not been included in the proposal.

Pg. 29 describes the area as '**Demonstrably special to the local community**'

The assumption here, and in many of the public comments, seems to be that the public have right of access to this land. This is incorrect. The public only have a right of way across a short and narrow section of the land at the far end nearest to Church Road. This short footpath joins the road at Everland's and St Georges close. The footpath is **not** adjacent to the river. Any reference to a 'riverside' walk is misleading as there is no public right of way along the river and indeed the land is somewhat overgrown limiting anyone walking beside the river.

Pg. 29 '**Beauty**' This section of the report refers to 'ancient oak trees'. In the next section (historic significance) it states that; 'oak trees are remnants of Berkeley estate parklands'.

Again, this is somewhat misleading. To be clear there are **two** old oak trees at the far end of the land next to the public footpath. It is surprising that such misleading information is included in what should be a clear and objective report and it is not clear where this information has come from. The suggestion that the trees are '*remnants of estate parklands*' is not supported by evidence. This illustrates Mr Drayton's point about the lack of objectivity and accountability in this report.

Pg. 29 '**Historic Significance**' We refer you to the comments in the letter from Mr Daniel Drayton, January 2019. The area where the railway line once was is now overgrown and there are no remains of the track. It cannot therefore be argued that the site is of historic significance. The report refers to '*One of the only accessible parts of the old Cam Dursley railway line left*'. There is no right of access as outlined above and no evidence of the track. This is misleading and again demonstrates the lack of accuracy and objectivity in the draft report.

Pg. 29 '**Recreation**' All of this section is again misleading as this is private land and the only right of access is the very short footpath at one end of the land. There is reference in one of the public comments to the field being used for 'football and cricket' and 'fishing'. In 40 years, we have not seen anyone fishing on our land and the ground is overgrown and uneven and unsuitable for cricket or football. It is possible that the submission's reference to football and cricket has confused our land with that of the recreational field in Everland's.

Pg. 29 '**Wildlife**' Reference to wildlife appears to be based on subjective comments. There is no objective evidence base to support these claims. Indeed, having the land in the family for over 40 years we are not aware that most of the animals and birds referred to reside on our land. That is not to say they have not been seen, there is no way of knowing this. But to argue that this makes the site special is speculative as many of these birds and animal may also have been seen on adjoining land or other fields in the area. There is no evidence that these animals and birds live on or are dependent on the land.

In summary we do not agree that sound or sufficiently objective evidence has been presented to justify proposing the land we own at Everland's to become a Local Green Space, and as Mr Drayton has set out in his letter serious concerns about a failure to follow the appropriate process.

The National Planning Framework clearly stipulates that; 'The Local Green Space designation will not be appropriate for most green areas or open spaces'. The case has not been made as to why this piece of land could be considered as 'special'.

As landowners we would like reassurance that no one with a particular interest in this piece of land has been involved in the decision-making process so far and that all decisions have been made purely on factual and objective evidence.

We continue to strongly object to this proposal,

Yours sincerely,

Wendy Ghaffar and Ian Harris