

**CAM PARISH COUNCIL
Stroud Local Plan Review
Regulation 19 Consultation
Representation**

Site Allocation Policy PS25

Introduction

NPPF para. 35 sets out four 'tests of soundness' for local plans

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

In respect of b) the plan should be based on a robust and credible evidence base, backed up by facts and the participation of the local community and others having a stake in the area. The plan should also provide the most appropriate strategy when considered against reasonable and realistic alternatives and subject to sustainability appraisal.

Failure to Give Appropriate Weight to Policy and Guidance within the Made Cam Neighbourhood Development Plan and Landscape Sensitivity Assessment Evidence Bases for the Stroud Local Plan and Cam NDP.

Cam Parish Neighbourhood Development Plan 2019 - 2031['Cam NDP'] was prepared based, in part on a landscape sensitivity study of the area including a detailed assessment of landscape sensitivity of all potential development areas within Cam Parish. This assessment formed part of the evidence base that supported the policies in the Cam NDP that was endorsed by Stroud District Council on 4 June 2020 following examination and referendum. The evidence base for the NDP sets out a more localised appraisal of the landscape in the Cam "Landscape Sensitivity Assessment" (Potterton Associates Nov 2018) which supplements Stroud District Council's "Stroud Landscape Sensitivity Assessment" (White Consultants Dec 2016). Both studies concluded that it would be undesirable to develop site PS25 for the following reasons:

1. the relationship of PS25 with the River Cam

2. views of PS25 from the Cotswold AONB
3. the relationship of PS25 with Cam's built area
4. the access and amenity value of connecting public rights of way through the site into the open countryside from the Rackleaze Local Nature Reserve.

Cam NDP Policy CAMES1 (green infrastructure and biodiversity) and supporting plan (fig 7):

1. notes that the River Cam forms a distinct eastern boundary to the village
2. identifies Rackleaze, the River Cam and connecting public rights of way as key green infrastructure assets.

The proposed allocation of PS25 for development fails to have appropriate regard to:

1. the adopted Cam NDP
2. the Stroud Local Plan Review's published landscape evidence base.

Accordingly, the Stroud Local Plan Review is contrary to guidance set out in the NPPF, specifically:

- Para. 16 c) in that the Plan has not been shaped effective engagement between plan-makers and communities and specifically the policies in the adopted Cam NDP;
- Para. 35 b) in that it does not take into account the reasonable alternatives and is not supported by the Council's own evidence

In support of the Parish Council's contention that the Stroud Local Plan Review is not sound:

1. Local Plan Policy PS25 (Clause 6) requires:

"A layout, density and built form and character which conforms to the Cam Neighbourhood Plan Design Code"

However, as stated above, the policy allocation as written does not identify criteria that specifically require the protection of key environmental and community assets identified in the Cam NP (Policy CAMES1 (Fig7)).

As a result it has been allocated for a housing density and coverage that will be unlikely to be capable of conforming with Policy PS25 Clause 6 and adopted NP policy CAMES1.

It is there considered to be undeliverable, contrary to NPPF Para 16 (b); deliverability.

Cam PC's would recommend Site PS25 is deleted from the Stroud Local Plan.

This would enable to plan to be in conformity with NPPF Para' 35 clause (b) by demonstrating a direct and positive response to;

- Policy CAMES1 of the Cam Neighbourhood Plan
- Published Local Plan and Neighbourhood Plan published and validated landscape evidence

CAMES1 policy attached

Green Infrastructure and Biodiversity - Policy CAMES1

Objective

- 01 Protect, improve and extend the Green Infrastructure network across the Parish, ensuring a functional and well connected resource that contributes to a high quality environment for people, including those who have mobility issues, and wildlife.

POLICY CAMES1

Green Infrastructure and Biodiversity

Development adjacent to, or containing identified Green Infrastructure network assets and priorities (Figure 7) should protect and, where feasible, improve and extend the network. Development in other locations should protect green on-site infrastructure and will be encouraged to enhance the network where feasible.

Where development results in the unavoidable loss of existing Green Infrastructure replacement should be provided on-site. Where this cannot be delivered, appropriate off-site provision should be agreed.

Development should preserve and protect priority habitats as illustrated in Figure 6, and where possible provide net gains for biodiversity.

Explanation

Green Infrastructure (GI) is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green Infrastructure is important to the delivery of high quality sustainable development, alongside other forms of infrastructure such as transport, energy, waste and water.

Cam's GI network is extensive and varied for both wildlife and people. Figure 6 illustrates the location of wildlife sites and habitats in the Parish. There are also many different places that benefit people's wellbeing including accessible natural green spaces, play areas, allotments and recreation grounds, together with the many 'snickets' and Public Rights of Way. This GI network has many and varied benefits for the environment, biodiversity and for people; it can help contribute to the health and wellbeing of communities, it can inform a proactive approach to mitigating and adapting to climate change, and it can inform where priorities should be for protection and enhancement. It is also an important part of what gives our Parish a distinct identity and makes it a good place to live.

Figures 6 and 7 identify existing assets, priorities and opportunities as detailed in the Cam Green Infrastructure Report (2019). The Stroud District Open Space and Green Infrastructure Study 2019 (another key reference in this evidence base) includes analysis of the existing quantity, access and quality of open space and GI, considers future requirements for open space from population growth, and identifies priorities. The Cam and Dursley Cluster Sub Area Analysis Report (part of the Stroud report mentioned ahead), demonstrates the overall requirement for new open space provision within Cam and Dursley cluster from new development.

The Cam Design Code (2019) also clearly sets out the importance of existing

GI assets in the Neighbourhood Plan area, and also sets out more detail about where priorities and opportunities for GI exist. Green Infrastructure in Cam is established to be a key element in delivering locally distinctive place-making in Cam.

The requirements for onsite provision will depend on the size and location of new development and is based on the predicted population growth (for any required provision that cannot be provided on site, where possible CIL (Community Infrastructure Levy) contributions should be provided for off-site provision/improvements).



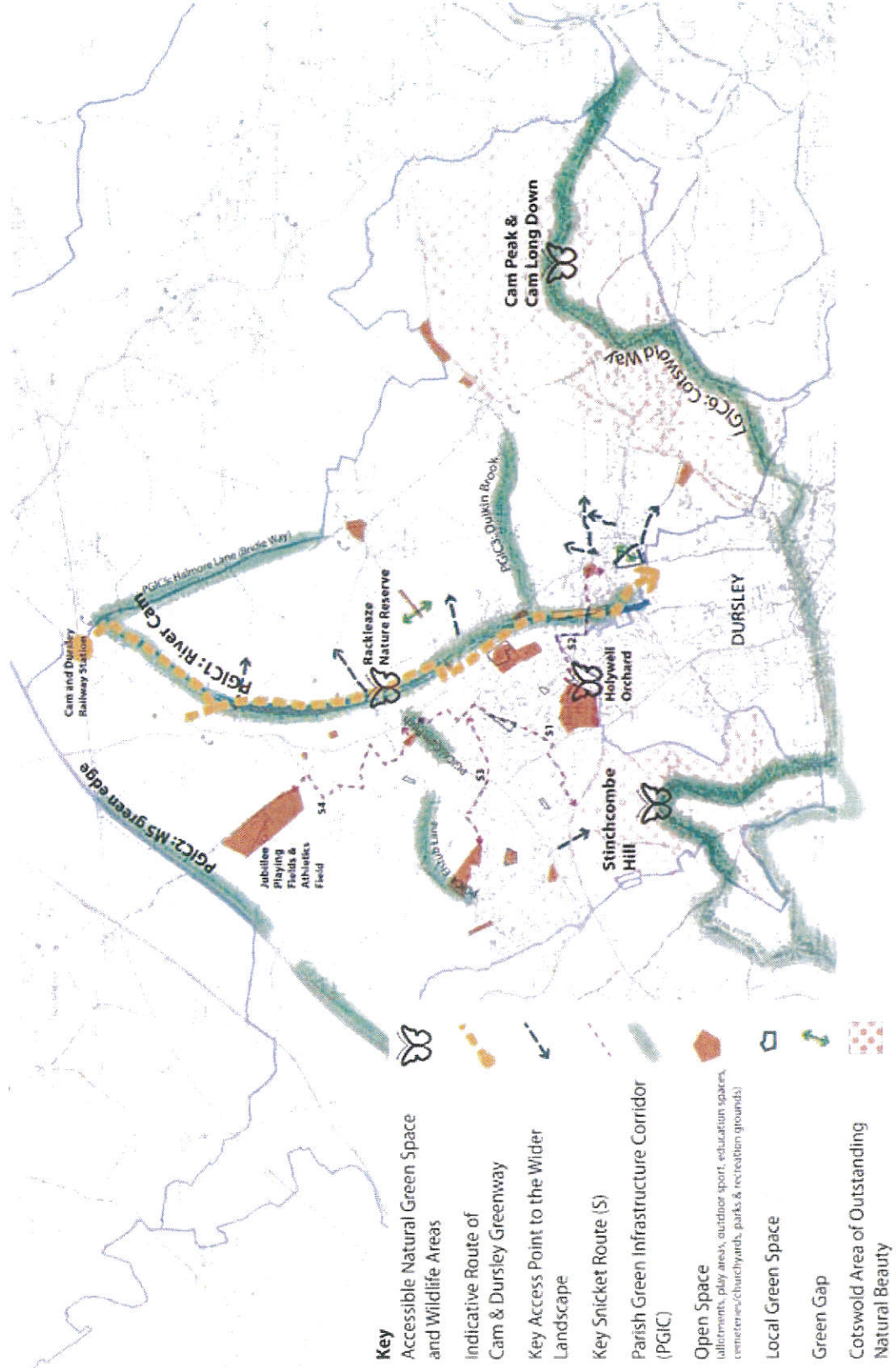
Building with Nature

Because of the particular importance of landscape and green infrastructure in and around Cam, the Neighbourhood Plan advocates an approach to development that adopts the principles of the Gloucestershire based “Building with Nature” standards.

Building with Nature sets out a framework of standards divided into three themes: core, wellbeing, water and wildlife. The aim is to enable the delivery of high quality green infrastructure at each stage of the development process, from planning and design, through to long-term management and maintenance.

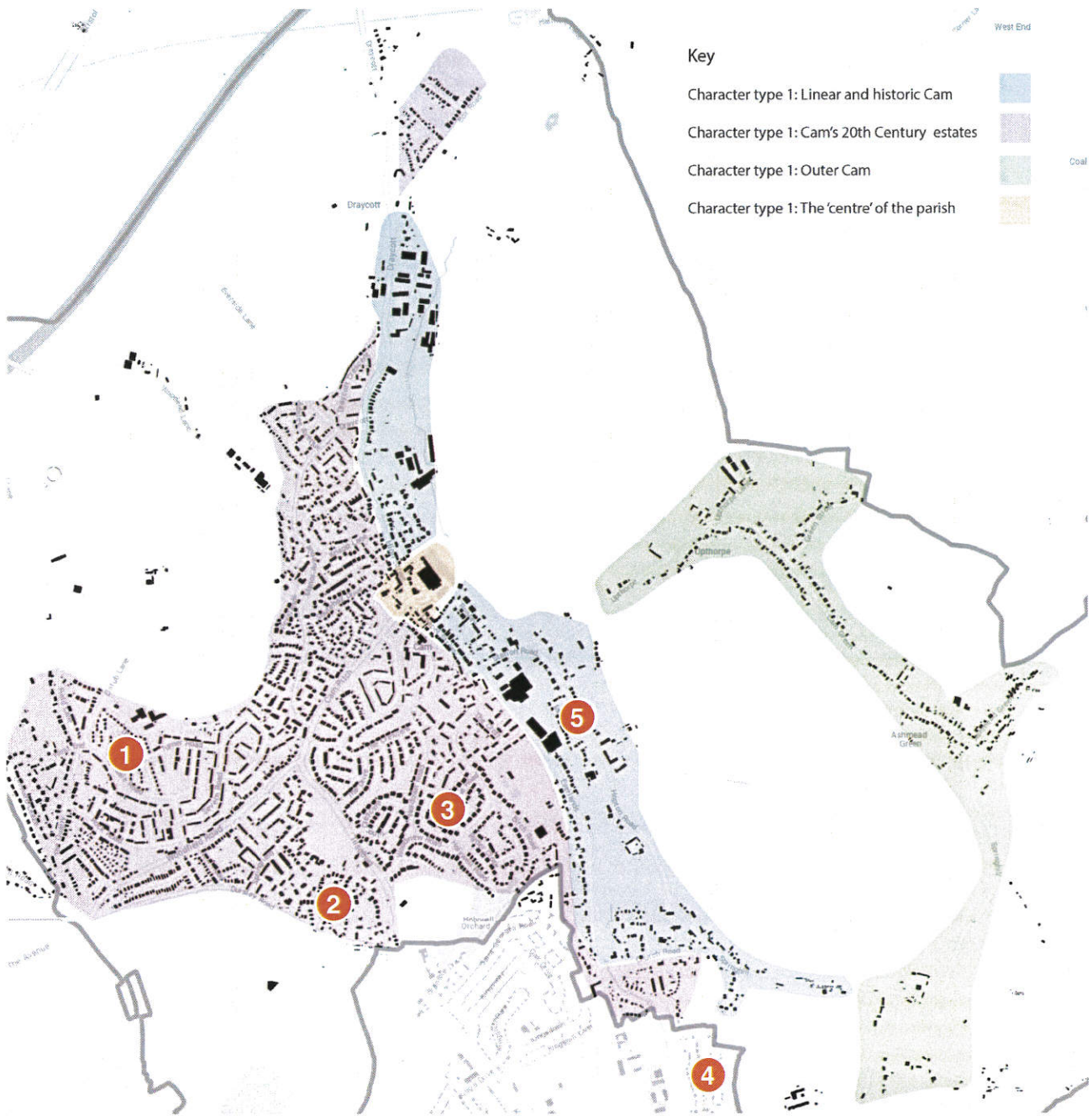
The Cam Neighbourhood Plan seeks a landscape and green infrastructure led approach to future development and encourages developers to seek to achieve a Building with Nature accreditation.

Figure 7: Green Infrastructure Diagram: Assets and Priorities



Appendix 1

Samples of residential density in and around Cam



Locations of the samples - shown on Figure 2 from the Cam Design Code

- 1** The Crapen.
- 2** Lambsdowne.
- 3** Marlstone Road area (also Woodview Road, Leaside Close and Nordown Close).
- 4** Littlecombe.
- 5** Millbank and Hopton Road.

24 dwellings per hectare

The Crapen

20th Century residential development, based on an irregular block layout, situated near the western edge of the settlement. Comprises detached bungalows with on and off-plot parking. Streets have generous green verges, with some semi-mature trees.



23 dwellings per hectare

Lambsdownne

Late 20th Century residential development, based on a cul-de-sac layout, situated near the southern edge of the settlement. Comprises a mix of detached houses and bungalows with on-plot parking.



26 dwellings per hectare

Marlstone Road area

Late 20th Century residential area, with through streets and culs-de-sac, situated to the south of the centre. Comprises a mix of semi-detached houses, with some short terraces. Primarily on-plot parking. Building setbacks provide sufficient space for greening the streetscene.



30 dwellings per hectare

Littlecombe

21st Century residential development, situated to the south of the parish. Comprises a mix of detached and semi-detached houses, with some short terraces in Phase 3. Primarily on-plot parking. Layouts based on narrow fronted plots, with limited building setbacks.



28 dwellings per hectare

Millbank and Hopton Road

Millbank is an infill estate from the latter part of the 20th Century, adjacent earlier linear residential development along Hopton Road, to the south-east of the centre. Millbank has a culs-de-sac layout, with primarily semi-detached houses. Parking is on-plot, with building setbacks providing space for greening the streetscene. Hopton Road has a mix of detached and semi-detached homes of different styles, set in relatively generous plots.

