



# Cam Parish Council

## Local Plan Review Response

January 2020

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# 1 INTRODUCTION

This report is Cam Parish Council's representations in respect of the Stroud District Council Local Plan Review.

Whilst the Parish Council recognises the benefits for strategic growth to be located in Cam, we have concerns over the options as presented. Significant amounts of housing have already been delivered in Cam, over successive planning periods with much more still to come. This has left Cam with substantial additional residents but little of the required infrastructure to support their needs. Several small scale pockets of development has increased the impact on the adjoining towns and villages as well as put additional pressure on services within Cam.

Cam Parish Council wishes to make clear that it does not wish to receive any further development to Cam that is not integrated into the existing community.

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



## 2. ISSUES AND OPTIONS - 40 KEY ISSUES

The review document has outlined 40 key issues for the district. These largely cover the themes that one would expect it to: priority issues, economy, affordable house, environment, health and well-being and delivery.

### **A) PRIORITY ISSUES**

**Moving towards Carbon Neutral by 2030** – More support needs to be given to town and parish councils to assist in this aspiration.

**Ensuring development in the right places** – 80% of the allocated development is expected in the South of the District, it is arguable whether this is a correct placement of new homes and whether the unbalanced approach is sustainable.

**Conserving and enhancing the Countryside and biodiversity** – Cam has its own valued green infrastructure network that is appreciated by its residents. It is vital to protect the scenic beauty of the escarpment and other skylines from both inappropriate developments and inappropriate landscape management. It is important to defend the remaining lengths of the River Cam from development. Overall, the development of this site PS25 would be harmful to the River corridor, landscape character and users of the PROW network.

**Maximising the potential of brownfield and underused sites** – Whilst the development of existing brownfield and underused sites is highly supported, the non-development of the existing allocated sites still causes concern with the delay. Cam has recently lost land allocated as employment to a new housing development at Coaley Junction, the loss of employment land is very much objected to when preference is given to housing.

**Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the nature environment** – The development of land known as PS25 (land East of River Cam) would not support this concept. The land is currently managed as a wetland and conservation area and the species of animals and plants that are noted here would be very effected by a new development beyond. At present there is a footpath through the area which is managed by Stroud Valley Project, should an additional 180 homes be built, the main village centre would need to be accessed via this route causing great effect to the wildlife and wider ecological



network. The impact upon the River Cam should not be underestimated which the introduction of new homes at this location.

**Tackling the acute lack of affordable housing in the district –**

Affordable homes is an issue across the district, this is recognised and supported but the introduction of good quality homes for all to enjoy is vital. 30% affordable allocation would be welcomed on all developments of 4 or more, not just in designated rural areas.

**B) ECONOMY**

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

Cam has very low employment opportunities and the vision for employment growth dictated in the current local plan has not progressed as envisaged. The loss of Coaley junction as an employment allocation to housing, as well as a reduction in retail spaces in Cam High Street due to change of use in commercial properties has impacted upon the sustainability of our village. A large investment would be required to improve these connections prior to accepting more development.

The Parish Council's principal concern is that the intention for future housing to be developed along with a commitment that employment will follow, is an unachievable promise. The very location, next to the M5 and the A38, of the new and proposed developments positively invites the idea of commuting.

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

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

More also needs to be done to retain the existing businesses in the area and there is some evidence that the requirements of growing businesses need to be accommodated — with larger work units, and further restrictions on



multiple occupancies of the smaller units to ensure sufficient start up spaces are available.

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

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

It is essential that additional services are provided in tandem or preferably prior any new housing developments so that the existing local population is not adversely affected by the increase in demand by the residents of new housing.

**TOWN CENTRES VISION** - The Parish Council welcomes the recognition that growth should help to facilitate improved service provision in the town centres. We would wish for Cam village centre to be explicitly recognised in relation to the proposed growth as an aspiration noted within the Cam Neighbourhood Plan. Whilst Dursley is the larger centre and is adjacent to Cam, if improvement in the services in Cam village centre is not facilitated then new residents and businesses will all choose to access Dursley's services, to the detriment of Cam. This will put additional pressure on the highways network of Cam resulting in unacceptable levels of congestion through the centre of Cam and the roundabout by Tesco which is already noted as being at capacity currently.

The vision of the emerging Cam Neighbourhood Plan is to create a vibrant and thriving village centre which provides its residents with the basic needs of a community, encouraging tourism potential and support good life/work conditions. An additional allocation of housing at the Draycott site would elongate Cam to create a fragmented parish and not add to a cohesive community. Already the creation of new housing at Box Road has shown that integration has been hard to achieve.



### **C) AFFORDABLE HOUSING**

Cam Parish Council would wish the local plan to recognise that 'providing affordable and energy efficient homes for diverse and changing population' applies as much to market housing as it does to affordable housing. In the current financial climate, there are many people forced into private rented accommodation at high rents comparative to their earnings because they neither qualify for social housing nor can afford market housing at today's prices. This is not necessarily about providing more intermediate housing, but rather about ensuring sufficient social housing within the allocation of affordable housing.

The objective recognises the importance of locating new development to meet the particular need of older residents and it is hoped that following the recent reduction in sheltered housing throughout Cam, priority should be given to encourage more suitable sheltered units to be made available.

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

The strategic allocation of houses for Cam as set out in the Local Plan 2015 has not yet been realised and any further developments should not be promoted until the impact of existing allocations is realised.

The local plan review touches lightly upon self-build opportunities, but far more could be encouraged to provide opportunities and support independent builders to deliver individual dwellings to fulfil individual requirements. The possibility for self-builders to create new model homes could diversify and stimulate the market if allowed.

### **D) ENVIRONMENT**

Cam is an attractive place to live and appeals to a wide and varied demographic of local and potential residents (plus wildlife). The draw of Cam's natural beauty arises from its location nestled at the foot of the Cotswold Hills, surrounded on three sides by ancient woodland and the River Severn to the north, as highlighted in the emerging strategy. Given the significance of the Cotswold Area of Outstanding Natural Beauty, Lantern and Heritage Walks plus the importance of the Cotswold Way National Trail to the Stroud District, its protection should be explicitly referenced within the strategy, with sensitivities and considerations closely managed in conjunction with any potential development.

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



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

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

Cam as a historical site has to date received very little recognition but the recent findings of a Roman Villa on the site of a development at Box Road has shown that Cam had some significance when discussing history. A number of dwellings have achieved listed status and the land adjoining Tilsdown House (PS21) is no exception. As one remaining house of exceptional status, significant emphasis should be given to this site and building should not be allowed in order to ensure that the location remains unhindered and unchanged.

Sewerage and drainage capacity were noted as another high concern for a development within Cam Parish. Concern has been raised regarding the sewerage infrastructure and whether capacity is available. The allocation of so many houses should not be able to join the sewage network unless further significant work is undertaken to guarantee that the current parish housing will not suffer from further sewage issues due to additional housing joining the network.

No increased risk of flooding on or off the site would be acceptable, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development would always be welcome. Any amendments to the flow of the River Cam could have a detrimental impact further up or down river and full analysis would be required prior to any work taking place.



## **E) HEALTH AND WELL BEING**

Cam has very' good facilities and services, its own doctors, dentist, pharmacy, supermarket, schools, post office etc. New residents can therefore take advantage of these services. This is perfectly acceptable provided there is spare capacity in the existing services in question. However, the Parish Council's concern is whether strategic growth of the scale proposed will create enough demand for the increase in new services that would justify and fund enough new provision. The adjoining parish/towns of (Slimbridge/Coaley/ Dursley/Stinchcombe) all rely on these facilities and services and any increase in development would impact upon the needs of these communities too and would need to be considered.

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

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

The benefits of improvements to the facilities at the Jubilee Field and adjoining land would support the needs of the young people in the community and it would no doubt provide health and well being benefits for many but the accessibility of the site for non-pedestrians has always been problematic and would need to be addressed and improved. The Green infrastructure network throughout Cam, identified as evidence as part of the emerging neighbourhood plan (Charles Potterton Report) clearly shows that development in the area below Tesco would not be favourable and would have a negative impact upon the green corridor. The site known as PS25, is bordering the Rackleaze Wildlife area which is managed by the parish council with the assistance of Stroud Valley Project. As the river flows throughout this site, it is home to much wildlife including otters, grass snakes and marsh orchids. This site is not seen as appropriate for development due to its wildlife constraints as well as accessibility and impact upon the landscape.

High levels of noise pollution has always been of notable concern from the evidence collected. The location of the Draycott site (PS24) is problematic for the motorway noise so a good landscape buffer for noise mitigation would be required between the existing edge of Cam and the M5 motorway.

## **F) DELIVERY**

Cam Parish Council welcomes the prospect of the delivery of co-operative working with public health providers to ensure health and well-being is central to the planning



process. The open play spaces and connectivity between new and existing developments, known locally as snicket ways, are key to integration between new and more established residents and very much an integral part of Cam. Working with neighbourhood groups, keeping the residents informed and consulted on with any changes encourages a sense of community.

### **3. TRANSPORT/TRAFFIC**

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

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

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

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

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

Capacity concern for M5 junctions 13 and 14 has been observed. Queuing times at these junctions at Peak Time are notable.

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

Poor pedestrian links are present on the northern and southern arms of the St Johns Roundabout with narrow paths on the western verge of the A38 (Stroud District Council Local Development Plan Draft Transport Impact Assessment 27 March 2014).



Improvements would be required to attain good pedestrian and cycle links for Cam residents.

Cam & Dursley Rail Station facilities and services are in need of major refurbishment. Currently, the cycling provision, including safety and storage of bikes is insufficient and in order to improve these facilities, major investment will be required. The aspiration of the Metro-west providing increased connectivity between Bristol and Gloucester will be welcomed but concern that improvements within the local Transport Plan review are scheduled for many years and it may be hindered with the introduction of a "commuter coach" from the possible new Sharpness development.

#### **4. DEVELOPING A VISION FOR THE FUTURE - SHAPING THE FUTURE OF CAM AND DURSLEY**

Previously identified within the 2015 local plan was a protection limit of the 50m contour line — this has now been removed. The parish council considers that this protection is vital to discourage further building into the land beyond this line as in such close proximity to the AONB and this has been recognised within our emerging neighbourhood plan.

The emerging plan makes reference to Cam having a ***very significant employment role*** but this is disputed as many residents out-commute on a daily basis creating a dormitory commuter village with a local service centre. Although the previous plan identified Cam needed a larger employment allocation, little incentive has been delivered to enable these sites to become available and no further information has been made available as to when the sites may come forward.

#### **5. IN CONCLUSION**

Cam Parish Council rejects the proposals to deliver PS25 (land East of the River Cam - 180 homes) and PS21 (Land adjacent to Tiltdown House - 15 homes). Whilst it is appreciated that a larger scale development at the Draycott site (PS24 West of Draycott) could improve accessibility and facilities to the Jubilee Field, it believes that no further allocation of housing should take place within Cam until the effects of the previous allocation are fully assessed and mitigated.

Whilst the proposal for the allocation of a garden village at "Wisloe" is understandable, we strongly object to this development due to the significant negative impact on the services and infrastructure within Cam.