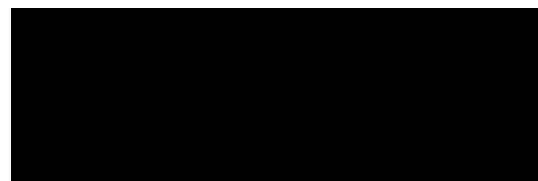


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Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
Ebley Mill  
Stroud  
GL5 4UB



18<sup>th</sup> January 2019

Dear Planning Strategy Team,

### **Local Plan Review – Emerging Strategy consultation – Land at Bowlers Lea, Cam**

Strutt & Parker acts on behalf of Intro Crowd, owners and promoters of land at Bowlers Lea, Cam. We write in response to the Council's Local Plan Review and, specifically, the current Emerging Strategy consultation. Comments have been provided in relation to a selection of the questions that are set out in the Emerging Strategy paper.

#### **Question 1.0b**

While we are broadly supportive of the top 5 issues that have been identified in the Emerging Strategy, we have a couple of reservations about the ways in which the Council intends to tackle these issues. Firstly, while the Council intends to concentrate housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure, it is considered that this may give insufficient weight to ensuring that other settlements that may not have the best access in the district to services and facilities, but nevertheless are well served, are able to grow and sustain themselves. Therefore, it is considered that an additional bullet point could be added to the intended list of actions under Issue 1 to state that settlements with an existing range of services and facilities will be expected or able to deliver a proportionate amount of new housing to ensure that the vitality of these settlements is sustained into the future.

Secondly, while we understand the Council's desire to maximise the potential of brownfield sites to contribute to housing supply, the Emerging Strategy should also recognise that such sites will only be able to deliver part of the district's housing need. As a result, it is considered that greater recognition should be given to the role that greenfield sites will play in meeting projected housing need, perhaps by adding an additional bullet point to this effect under Issues 1 or 3.

#### **Question 2.3a**

Yes, we agree with the ways in which the Emerging Strategy intends to meet local housing need, particularly the plan to deliver a mix of brownfield and greenfield allocated housing sites of varying sizes to ensure delivery is maintained throughout the plan period.

#### **Question 4.2a**

Yes, we support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud district.

#### **Question 4.2c**

Furthermore, we agree with the strategy to concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud.

#### **Question 4.2d**

As noted on pages 34 and 35 of the Emerging Strategy paper, *“Delivering the growth expected by central Government within the next 20 year time horizon will be challenging. The strategy demands an increase in house building rates beyond levels achieved in recent memory. The strategy includes supply from a range of small, medium, large and very large sites at a number of different locations, which together provide opportunities for all levels of the market to deliver. However, delivery rates are vulnerable to changes in economic cycles, brownfield sites can be complex and expensive to develop and the creation of new settlements is an ambitious undertaking. We may need to identify additional reserve sites, should the sites identified in this document not come forward at the rates envisaged...”*.

In terms of the final sentence in this paragraph, we agree that additional reserve sites should be identified to ensure that the updated Local Plan is robust and contains a sufficient supply of deliverable housing sites, particularly as there is a high likelihood that some of the larger allocations identified in the Emerging Strategy will not deliver at anticipated rates.

#### **Question 4.4c**

Yes, we support the principle of allowing some limited development beyond settlement development limits.

#### **Question 5.1a**

It is considered that the Emerging Strategy places an over-reliance on potential site PS24 to meet the housing needs of Cam. At up to 700 dwellings, it is apparent that this strategic site will take a significant period of time to be completed and that any delays or issues with the site could have a serious impact on the ability for this quantum of development to be delivered within the plan period. Not only would this harm the growth plans for the settlement, it would also have a detrimental effect on the growth plans of the district.

As a result of the above, it is considered that greater consideration should be given to the alternative sites surrounding the settlement, particularly our client's land identified as site CAM024. We describe this site as Land at Bowlers Lea, given that the likely access point would be via this existing road.

When the Council assessed the site as part of a previous Strategic Assessment of Land Availability (SALA), it was considered to be unsuitable for development because of the likely high landscape impact. Specifically, according to the Council *“Development on the rising slopes would impinge on their function as backcloth to the settlement as well as potentially being highly visible to the wider countryside and the M5 to the north”*.

Aspect Landscape Planning has been appointed to review the potential landscape and visual effects relating to the development of our client's site and the resulting Landscape Technical Note accompanies this representation.

The Technical Note concludes that the site is clearly well contained by existing vegetation and topography, with views towards the site only being readily apparent from its immediate setting, rising landscape to the west and the wider landscape setting to the east and south. It is not considered that the site is 'highly visible' from the M5 to the north, with the motorway corridor being lined by mature vegetation associated with the embankments, which when combined with the localised topography, entirely contain views of the site. Whilst it is acknowledged that the undeveloped nature of the site provides some contribution to the backcloth of Lower Cam from the wider landscape setting to the east, the green ribbon of backcloth land perceived from the Cotswolds AONB largely precludes the site itself. The apparent backcloth land comprises the higher east facing slopes of the localised hill to the west of the site. In other words, when our client's site is viewed in isolation, it does not make a meaningful contribution to the backcloth of the settlement, as originally perceived in the Council's SALA.

The Technical Note goes on to add that *"It is therefore considered that the site and receiving environment have the capacity to accommodate sensitively designed residential development. The proposals will not result in significant harm to the landscape character or visual environment and, as such, it is considered that proposed development can be successfully integrated in this location and is supportable from a landscape and visual perspective"*.

In our view, the site specific review undertaken by Aspect Landscape Planning demonstrates that the previous concerns raised by the Council in relation to site CAM024 are unfounded and that the landscape to the west of Cam will only be harmed should the rising land beyond our client's site be built on.

A Landscape Capacity Plan has been included within the Technical Note, which demonstrates how well contained the site is and how a residential development could be accommodated. This Capacity Plan indicates that around 30 dwellings could easily be delivered on the land, without harming the surrounding landscape. While this plan is only indicative at this stage, it demonstrates that a residential development on site CAM024 would represent a logical addition to the settlement.

It is considered that this site should be given greater consideration by the Council as a potential housing allocation in the updated Local Plan. At the very least, it is submitted that our client's site should be considered as an additional reserve site, to be brought forward in the event that the larger strategic allocations within Cam and the wider district do not deliver at the expected rates.

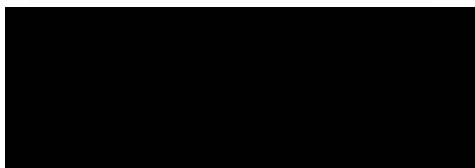
In summary, it is considered that site CAM024 is an excellent potential development site with no fundamental constraints. It is 'deliverable' as defined by the National Planning Policy Framework 2018 (NPPF), being immediately available, offering a suitable location for development on the edge of the district's second largest settlement, and being achievable with a realistic prospect that housing on the site will be delivered within five years. We believe that development on this site could be achieved without causing undue harm to the surrounding landscape and the visual amenity of the settlement.

As set out in the Emerging Strategy, Cam offers an excellent range of community services and facilities and when considered alongside Dursley, represents the best access to key services and facilities of anywhere in the district. It is therefore considered that the settlement is capable of accommodating further housing development and that there is no reason why our client's land at Bowlers Lea could not contribute towards meeting this growth.

Thank you for taking the time to consider this representation and the accompanying Landscape Technical Note.

Please get in touch if you have any queries or if you wish to discuss the merits of our client's site further.

Yours sincerely

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**Strutt & Parker**