

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

16<sup>th</sup> December 2020

Dear Sir/Madam,

HLM012/NF

**RE: STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT PLAN  
ADDITIONAL HOUSING OPTIONS**

This representation is submitted on behalf of Hallam Land Management (HLM) by David Lock Associates.

HLM have an active interest in the evolution of the local plan and welcome the opportunity to provide further representations on the Stroud District Additional Housing Options 2020.

HLM have a substantial track record in bringing forward land for high quality and sustainable developments and have a long-term interest in the successful delivery of growth in Stroud District.

**Land Adjacent to Cam and Dursley Station**

HLM have specific interest in land adjacent to Cam and Dursley Railway Station, Box Road, located within a proposed strategic location for growth in the Draft Plan. HLM submitted an application for outline planning permission for up to 42 dwellings, validated by Stroud District Council in December 2018 (reference 18/2697/OUT). The site included as site CAM015 Land west of Cam & Dursley Train Station in the 2017 SALA assessment. You will recall that the 2017 SALA summarises the suitability of that site in positive terms as follows: *“Although not currently policy compliant the site has no overriding physical constraints or potential impacts preventing housing community or employment, with car parking associated with the adjoining station in the future subject to additional planting to the existing hedgerows”*

The application is for 42 dwellings and has recently been amended to include provision for car parking associated with the station – at the Councils requests. There are no outstanding technical matters to address as drainage, highways and all such matters are agreed with the respective organisations or consultees. The site does not have any such constraints.

We note that since the publication of the Draft Local Plan 2019, the Council has updated its evidence base and has published the 2020 SALA Update. Appendix 1 of that Update now confirms that the following sites immediately adjacent to site CAM015 now have planning permission: North West of Box Road (90 dwellings);

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adjacent to Box Road Avenue (35) and Coaley Junction (41 dwellings).

It is now the case that ALL of the land between Box Road Cam, the A4135 to the west and the railway line to the north, has planning permission except for Site CAM015.

It seems inconceivable, therefore, that site CAM015 Land West of Cam and Dursley Train station is not, and should not, be allocated for residential development. It is perhaps historical accident that this is the case in that much of the Draft Plan was prepared in advance of the approval of the adjoining schemes also to the north of Box Road – and the status of the area effectively changing.

Now that those adjoining sites have consent, and since the SALA found the site suitable for development, and because the planning application confirms that the technical consultees are content with development in this location, then there seems to be no good reason not to, and every good reason to, allocate site CAM015 for development.

Indeed, there can be few more sustainable sites for development than one located immediately adjacent to the railway station with bus interchange, at a Tier 1 settlement, and located immediately adjacent to a strategic site with community and other facilities and services.

In particular, allocating Land Adjacent to Cam and Dursley Station within the Draft Plan would achieve the following benefits, consistent with the overarching aims and objectives of the Draft Plan:

- delivery within highly sustainable location identified as the Council's key strategic location for growth;
- provision of a small-medium sized housing site to boost housing supply in the District and offer quick deliverability;
- opportunities for integration with adjacent development schemes to tie into and form the northern edge of the North Cam strategic urban extension;
- development within a highly sustainable location adjacent to Cam & Dursley Station, with potential to link into cycling and walking network;
- delivery of new affordable housing
- retention and enhancement of existing landscape elements and on-site provision of amenity green space, within a site not subject to any national or local landscape, ecological or archaeological designations; and
- sustainable urban drainage system with potential for infiltration.

HLM notes in the Additional Housing Options Consultation – that five new sites are proposed on page 8 – each between 15 and 45 dwellings in size (as is site CAM015). HLM agree it is these sorts of size of site that have great value in the particular circumstances of Stroud District if delivery (particularly boosting immediate delivery) are to be met. A variety of sites in this category is an expectation of the NPPF. The Local Plan Review 2019 – addressing some 638 dwellings a year – should be amended to include them.

***To this end – HLM strongly urge that that site CAM 015 is allocated in the Local Plan when it is published this year. The site should be allocated (and if a number needs to be attached to it - for 42 dwellings, not the 20 erroneously assessed in the SALA assessment]. Some 42 dwellings is demonstrated to be deliverable in the application described above. Better still, the development boundaries at Cam should be amended to follow not Box Road but the railway to the north – this would ensure consistency with et consents granted and allow for the development of CAM015 in a policy compliant way.***

***As set out in our representations dated 22 January 2020 it should be allocated to meet the housing needs set out in the 2019 Draft Plan – 638 homes per year. There is no reason why this should not be the case. Whilst it is possible also to include the site against the Future Additional Housing Requirements – as described in the latest consultation – the immediately deliverability of the site and its value in terms of sustainable development strongly suggest it be included to meet immediate need and support the delivery thereof. By doing so (and potentially by including other similar sites), and thereby by supporting delivery, mitigating the need for a reserve as discussed in relation to additional housing provision if the plan fails to deliver. The site would also bring immediately delivery of affordable housing.***

### **Additional Housing Options – Questions**

**Question 1:** If **additional housing land** is required Hallam Land Management do not support OPTION B (Smaller towns and villages), or OPTION D (wider dispersal).

Neither Options B nor C appear supported by evidence of sustainability.

OPTION A is also limited in the sense that it focusses on existing sites only and relates only to the intensification of development within strategic urban extensions. This would be a mistake - intensification at sustainable locations in Tier one settlements is the appropriate phrasing of the option. By this means sites adjacent to sustainable urban extensions could be embraced as well.

**Question 2: Not applicable**

**Question 3: The need for Reserve Sites.** The consultation seeks advice on whether we support the approach of identifying a reserve site or sites if housing doesn't come forward if housing development on the sites that will be allocated in the local plan should fail to come forward. Hallams approach is that it should not be necessary to wait for a failure of delivery to prompt either the release of reserve sites or an immediate review of the local plan.

Instead another option is proposed which necessitates, full and generous provision within the local plan itself this will require the allocation of additional, including small and medium sized sites, that will help to avoid the risk of failure to delivery in the plan, the consequences of which are very difficult in plan making terms. Clearly one such site which should be included is site CAM15 as described, and for the reasons set out above.

In this sense reserve provision should not be the favoured approach.

Given that Stroud District did not meet the Government's Housing Delivery Test and also experienced lower than required delivery rates in the two-year period 2015 – 2017 (due to delays to programmed delivery at major development sites), it is considered that there is an acute need to accelerate housing delivery in the District. Further delay or issues with only a couple of the sites identified in Core Policy CP2 would put the Council's housing delivery targets in jeopardy.

Instead proper provision should be made in the Local Plan now – to ensure that reliance is not placed on sites which may not deliver – the best means of doing so being the identification of additional deliverable sites. If this is done then the need for reserve provision is less of an issue.

**Question 4:** If **reserve sites are** required Hallam Land Management DO NOT support OPTION B (Smaller towns and villages), OPTION D (wider dispersal).

Neither Options B nor C are supported by evidence of sustainability.

OPTION A is also limited in the sense that it focusses on existing sites only and relates only to the intensification of development within strategic urban extensions. This would be a mistake - intensification at sustainable locations in Tier one settlements is the appropriate phrasing of the option. By this means sites adjacent to sustainable urban extensions could be embraced as well.

**Question 7** – It is unclear on what basis the 5 smaller sites referenced in Question 7 have been identified – and whether there is an adequate evidence base - and in particular how they have been chosen relative to other potentially more sustainable options of similar size. Moreover, more of these sorts of site (in terms of scale) should make an important contribution in the Local Plan itself (to meet 638 dwellings – or in effect provide proper comfort that the delivery of 638 dwellings a year can be achieved). The contribution against future additional requirements of the five sites will be limited.

**Question 8:** Any Additional sites? - see above. As set out in our representations dated 22 January 2020 site CAM015 should be allocated to meet the housing needs set out in the 2019 Draft Plan – 638 homes per year.

We trust these comments are helpful and should you have any questions, or require any additional information at this stage (particularly in relation to the positive progression of the application for 42 dwellings at CAM015), please do not hesitate to contact me.

Yours faithfully,

[Redacted signature]

[Redacted name]

CHAIRMAN

Email: [Redacted email address]

cc: Hallam Land Management Ltd