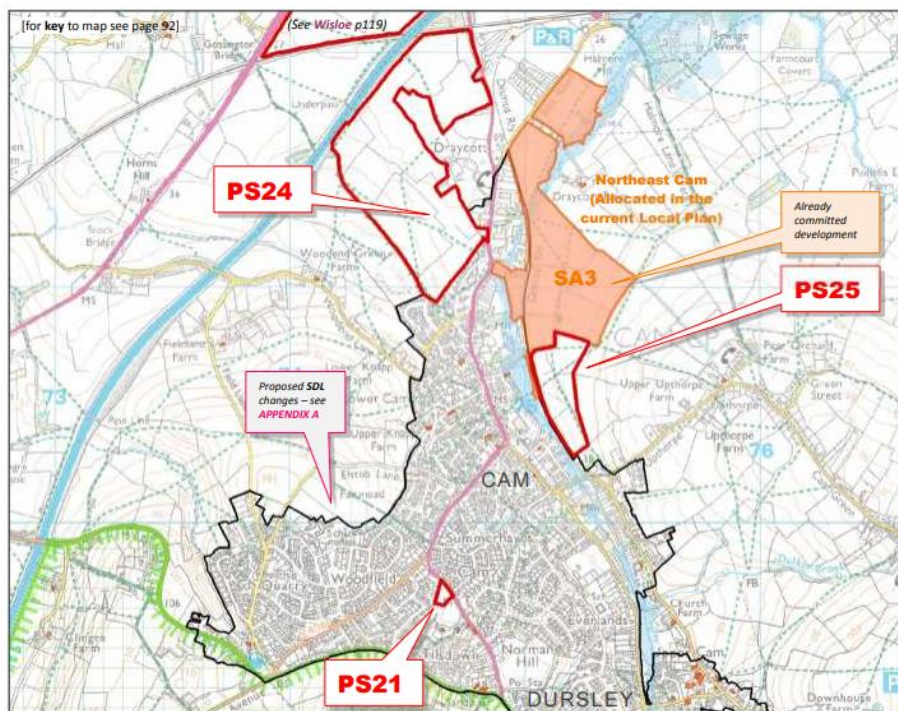




**TOWN AND COUNTRY PLANNING ACT 1990**  
**TOWN AND COUNTRY PLANNING (LOCAL PLANNING)**  
**(ENGLAND) REGULATIONS 2012**

**STROUD DISTRICT LOCAL PLAN REVIEW – DRAFT PLAN FOR CONSULTATION**

**REPRESENTATIONS ON BEHALF OF BATHURST LTD CONCERNING THE PLAN’S**  
**APPROACH TO CAM AND FUTURE PHASES OF THE MILLFIELDS DEVELOPMENT**  
**(Pages 91 – 96 of the Plan)**



**PREPARED BY**

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## **1.0 INTRODUCTION AND BACKGROUND**

- 1.1 The Stroud Local Plan was adopted in 2015. It identifies the housing, employment, retail and community development that is required to meet local needs up to 2031. It sets out the strategy for distributing development within the District and policies for protecting and conserving the natural and built environment.
- 1.2 Stroud District Council started a review of the Local Plan in 2017, in line with new Government requirements that local plans should be updated every five years. The review provides an opportunity to update the plan in the light of the revised National Planning Policy Framework (the Framework) and other material changes in circumstances since the preparation and adoption of the initial Plan. This includes the need to accommodate greater housing numbers over the next 20 years i.e. an extended plan period to 2040.
- 1.3 The *Local Plan Review: Draft Plan* was issued for public consultation in November 2019 and invites engagement and views which will be used to finesse the Plan prior to its submission for public examination and ultimate adoption. The Draft Plan explains that the consultation is aimed at understanding three broad sets of questions:
- *Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?*
  - *Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?*
  - *Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?*

Source: Page 2 of the Draft Plan November 2019

- 1.4 The representations set out in this document are made on behalf of Bathurst Ltd, who are the landowners that have taken forward the Millfields strategic housing and employment development at North-East Cam. Millfields is one of the most significant strategic allocations in the 2015 Local Plan (under Policy SA3), comprising 450 dwellings and two large areas of employment land. It is currently under construction.
- 1.5 The background to the delivery of Millfields is important and includes significant engagement with the LPA's planning officers, Cam Parish Council (CPC) and elected members, over many years.
- 1.6 It is not necessary to rehearse the full details of that dialogue and agreements, which span a long period of time, various iterations of Local Plans and a number of major planning applications. However, there are

two particularly important key points that have emerged over the years and should be treated as 'common ground' by all concerned. These are:

- I. Millfields has always been planned with the intention of expanding beyond the SA3 allocation to create a much larger sustainable urban extension of up to circa 1,500 dwellings. Additional land phase drawings have been openly shared with the LPA and other key bodies, including CPC.
  - II. The 50 metre contour has long been regarded as the sensible eastward limit of the strategic development.
- 1.7 It is also important to record that Bathurst Ltd has adopted a Plan-led approach in its progression of Millfields to date. Indeed, it awaited the adoption of the Plan in 2015 and accepted and worked with the 2015 Local Plan limitations on development quantum (450 homes) with its subsequent Outline planning application (LPA REF S.15/2804/OUT).
  - 1.8 The development consented under S.15/2804/OUT comprises 450 dwellings in 5 defined phases (H1 – H5) and 10.7 hectares of employment land in 2 phases (E1 and E2). All relevant pre-commencement conditions have been discharged.
  - 1.9 In terms of progress on site, Phase H1, comprising 137 dwellings, is currently being delivered by Bovis Homes. Phase H2 is earmarked for the next stage of development, and a reserved matters submission will follow later this year, with unit delivery programmed thereafter.
  - 1.10 Bathurst Ltd has also made a reserved matters application for the new Draycott access and Spine Road, which are critical to unlocking the delivery of Phases H3, H4, H5 and E2.
  - 1.11 This contextual background is important in respect of the representations that follow.

## **2.0 STRATEGY**

- ***Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?***

- 2.1 Bathurst Ltd broadly supports the preferred strategy for meeting future growth and development needs. The preferred development strategy is a sensible and evidence led 'hybrid' of the four Options that were set out in the 2017 'Issues and Options' consultation.
- 2.2 However, Bathurst Ltd has significant concerns about the piecemeal way in which the Draft Plan addresses site allocations in the Cam area.

- 2.3 The Draft Plan appears to pay little attention to the major opportunities presented by the significant investment and infrastructure already made to expand the sustainable urban extension at Millfields, adding just 180 dwellings to the southern end of Millfields, which it says will 'complete' the Cam strategic allocation, whereas the urban extension could easily accommodate substantially greater numbers.
- 2.4 At the same time, the Draft Plan appears to offer greater focus on introducing a very large, totally new, strategic development on a greenfield site (PS24). This site is not only remote from Cam's services and facilities, but it is also exposed to significant noise from road and rail corridors, along with other environmental and landscape impacts. Such a scale of development is also likely to be problematic in access and highway terms. Furthermore, it would appear as an extensive northwards sprawl of Cam up to the M5 motorway.
- 2.5 These concerns are set out in more detail in sections 3 and 4.

### **3.0 CAM AND MILLFIELDS**

- ***Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?***

- 3.1 As noted above, Bathurst Ltd has made a number of submissions to Stroud District Council setting out future phases for the Millfields development.
- 3.2 On 15 June 2018 we responded to the last Local Plan Review consultation stage and set out the case for additional phases that we considered should be incorporated. That case, based on the advice of the Council's Planning Strategy Manager, focused on phases that could be delivered within the Plan period, rather than longer term phases where land ownership matters still need to be resolved. We submitted a plan (attached) which set out the following additional phases:

**PHASE H6 – 50 dwellings.** This phase is within the existing SA3 allocation and the Outline 'red line' for S.15/2804/OUT). It is below the 50 metre contour.

**PHASE H7 – 117 dwellings.** This phase is to the south of the existing SA3 allocation and the assessed capacity assumes all dwellings would be beneath the 50 metre contour and a strategic landscaping belt would be included.

**PHASE H8 – 198 dwellings.** This phase is to the south of the existing SA3 allocation and immediately to the east of the Cam local centre. The

assessed capacity assumes all dwellings would be beneath the 50 metre contour and a strategic landscaping belt would be included.

These three additional phases would yield **365 dwellings**, all in sustainable locations, well connected to Cam's key services and facilities and as part of a carefully planned strategic extension, which already benefits from a mature masterplan approach. Furthermore, this scale of development, along with the existing committed housing numbers and employment land, is also likely to be sustainable and attractive to bus operators, creating the patronage necessary to support public transport services through Millfields, which has long been, and remains, an important aspiration.

- 3.3 Unfortunately, the Draft Plan ignores H6 entirely (50 dwellings) and limits the potential contribution of Phases H7 and H8 to just 180 dwellings through the modest PS25 allocation, when 315 dwellings are readily achievable. Bathurst Ltd is puzzled by this element of the Draft Plan and by the curious eastern boundary of its draft PS25 allocation (the plan on page 96 of the document) which does not follow any natural field boundary and is well below the 50 metre contour.
- 3.4 Whilst Bathurst Ltd reserves its position on the overall quantum of housing planned for Cam (PS21, PS24 and PS25 combined = 895 units), the Draft Plan's apportionment between the identified sites appears to be deeply flawed. It is particularly worrying that the Draft Plan implies that the Millfields development will be 'complete', with just the addition of the PS25 allocation of 180 units.
- 3.5 This is wholly at odds with previous engagement with the Council and other stakeholders over many years. Moreover, the Draft Plan's seeming preference for a larger, more remote and sprawling allocation (PS24), seems to be wholly at odds with sustainable development principles.
- 3.6 Surely, the Council should be looking at its existing SA3 strategic allocation, and its considerable infrastructure investment, to maximise (not limit) its contribution to sustainable growth. The Millfields additional phases are infinitely more sustainable and deliverable than any part of the PS24 site and, in particular, its more northerly fields (towards the M5).
- 3.7 This approach to the proposed sites in Cam appears to be deeply unsound and does not follow the evidence or the fundamental principles of sustainable development.

#### **4.0 POLICY / SUPPORTING TEXT WORDING**

- ***Are any further changes to the proposed policies necessary?  
Are there specific things that should be included in supporting text?***

4.1 In the light of the above, Bathurst Ltd requests the following changes to the policy content:

- 1. A specific policy should be introduced to update the 2015 SA3 allocation. This should include a direct reference to Phase H6 (50 dwellings) and update the SA3 allocation unit numbers to 500 dwellings. The policy should include a list of criteria to be applied to the H6 development, including affordable housing and strategic landscaping requirements.**
- 2. Draft Plan allocation PS25 should be extended to include Phases H7 and H8 shown on the attached plan with a combined housing unit number of 315. The associated policies should include specific criteria for this allocation, including affordable housing, strategic landscaping and strategic pedestrian / cycling links and connections.**

#### **5.0 CONCLUSIONS**

- 5.1 Bathurst Ltd welcomes the opportunity to comment on the Draft Plan. Whilst it is able to support the Plan's broad strategy, it finds that its draft approach to planned development in Cam is flawed and fundamentally unsound.
- 5.2 Put simply, it fails to harness the opportunities to build on (literally) the success of its existing strategic urban extension at Millfields. Changes to the Plan are necessary to reflect higher achievable housing numbers within the existing SA3 allocation (50 units) and the expansion of the urban extension southwards (adjacent to the Cam local centre) to achieve 315 new homes. These opportunities are more sustainable and less environmentally damaging than other growth options and should be prioritised and maximised.

**Attached:** Letter dated 15 June 2018 and associated Plan showing Millfields additional phases.