

SHF/CIR.P18-2691

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18<sup>th</sup> January 2019

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

Dear Sir

**Stroud District Local Plan Review - Emerging Strategy Consultation – PS24 Land West of Draycott (i.e. SALA site CAM25 Land North West Cam and CAM13 Land West of Draycott Crescent)**

Pegasus Group have been instructed by Robert Hitchins Ltd and Persimmon Homes to submit representations to the above consultation in respect of Land west of Draycott – SALA sites CAM13 and CAM25).

The representations respond to the questions as set out in the Emerging Strategy document in respect of the Cam/Dursley Cluster and Land west of Draycott.

**Question 5.0a - Do you support the proposed mini-vision for your area (s)?**

Pegasus Group on behalf of Robert Hitchins Limited and Persimmon Homes supports the proposed mini- vision for the Cam and Dursley area. Cam is identified in the Local Plan as a first-tier settlement and in terms of population is the second largest after Stroud. Together with Dursley, Cam makes a significant contribution and focus for growth in the District. Pegasus supports the vision of Cam and Dursley, being a sustainable place to live and work with improved support towards local services, infrastructure and providing for the social and economic wellbeing of the wider locality.

The provision of new homes will help to support economic growth and will reduce in commuting as a range of choice of new homes are provided for the 'area's skilled and trained workforce'.

It is noted that:

***"Cam and Dursley have the best access to key services and facilities of anywhere in the District."***

Pegasus Group would like to further emphasize the importance of suitable housing being identified as an element needed to deliver a sustainable place to "live and work", as identified in the mini- vision.

**Question 5.0b - Would you like to propose alternative wording? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to.**

No comments.

**Question 5.0c - Do you support the identified key issues and priorities for action for your area(s)?**

Pegasus Group supports the identified key issues and priorities for action for Cam and Dursley. Pegasus Group would like to highlight the importance of acknowledging the promotion of housing development in the area in order to create a sustainable place to live and work.

**Question 5.0d - Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).**

The emerging growth strategy for the district currently proposes at least 12,800 additional dwellings to meet needs for the next 20 years. The delivery of the emerging growth strategy is to be achieved partly through the development of the potential sites identified in the Emerging Strategy Paper. The emerging growth strategy states that the Local Plan Review document is to focus much of the development over the plan period at the main towns of Cam and Dursley, Stonehouse and Stroud, this is supported. Land west of Draycott ref PS24 is a greenfield site and comprises approximately 35 hectares and provides a suitable, deliverable extension to Cam.

The Sustainability Appraisal report states that it is expected that Land West of Draycott (PS24), amongst a number of other sites would have a particularly significant positive effect in relation to the SA objectives considering the site's capacity to accommodate a high level of housing growth.

**Question 5.1a**

**Assuming some growth is desirable, have we identified the best site(s) at each town and village? (Please clearly specify which settlement(s) your comment(s) relate to, and use the site reference numbers shown on the map, where relevant)**

"*Making Places Shaping the future of Cam and Dursley*" includes section "Potential sites for development". It identifies PS24 West of Draycott as the largest site with potential to deliver up to 700 dwellings plus open space. Due to the existing capacity, deliverability and site-specific characteristics provided in the paragraphs below, Pegasus Group supports the inclusion of the site in the development strategy for Cam.

The Sustainability Appraisal Report for the Stroud District Local Plan Review: Emerging Strategy Paper published November 2018 provides an assessment of potentially available and suitable and reasonable site options from various sources, including the Council's Strategic Assessment of Land Availability.

According to the Sustainability Appraisal Report supporting the Stroud District Local Plan Review Emerging Strategy Paper November 2018, Land West of Draycott is considered to have a particularly positive effect in relation to SA objective 1: housing, as it would allow for

the delivery of up to 700 homes. The Sustainability Appraisal report states that it is expected that Land West of Draycott (PS24), amongst a number of other sites, would have a particularly significant positive effect in relation to the SA objective considering its capacity to accommodate a high level of housing growth.

The detailed appraisal matrix provided as a part of the report (Appendix 6) indicates that concentrating development at locations which currently provide access to the widest range of services and facilities or would provide critical mass to support the delivery of new services and facilities is likely to have significant positive effects in relation to SA objectives 2: health, 3: social inclusion and 6: services and facilities. These effects are expected to be combined within minor negative effects considering that the low level of development which is to be supported within the smaller and more rural settlements is unlikely to support the delivery of more substantial services and facilities at these locations. The detailed appraisal matrix assessment provides a breakdown of the individual sites comprising **PS24: CAM025 Land NW Cam and CAM013 Land West of Draycott Crescent, Cam**. Both sites have a very high sustainability score when compared to other sites considered. It is noted that CAM026 is also part of PS24 and scores very highly and is also considered suitable and available for the scale and type of development as set out in the emerging strategy.

CAM025 Land NW Cam is considered to have a significant positive effect on housing contribution, with a capacity for 175 homes. CAM013 Land West Draycott Crescent is assessed to have a capacity for 375 homes, although the Strategic Assessment of Land Availability 2017 site assessment indicates a net developable area for both sites of 510 dwellings.

Both sites were assessed in the Landscape Sensitivity Assessment as being of medium/low sensitivity to residential development. They are not within the Cotswold AONB or within 500m of the AONB.

In addition to the above, both sites are considered to have a positive effect on the SA Employment Objective and are located within 600m of a key employment site (Draycott/Middle Mill Industrial Estate) and CAM013 Land West Draycott Crescent, Cam at a Tier 1 settlement.

The overall SA objective score for both sites is very high when compared to other sites considered. PS24 is a joint promotion, this factor is an advantage when considering deliverability. The Sustainability Appraisal objective 2 indicates that the CAM025 Land NW Cam site has a minor negative health score, with the justification stating that the site is not located within 800m of a GP and the site is not located within 400 m of a walking or cycle path. However, issues such as walking and cycling can be addressed in the preparation of a planning application. The proximity to a GP Surgery will depend on the needs and NHS policies for such provision.

The Sustainability Appraisal Report states that Cam, amongst other settlements is identified as a first-tier settlement, located on the A419 and A4135 respectively, with a good and relatively easy motorway access at the M5 which passes through the western part of the District. A significant positive effect is therefore expected in relation to SA objective 6: services and facilities.

The SALA assessment for CAM 13 in 2017 concluded that:

***"Taking account of the character of the site and its surroundings, this site could be developed for medium density housing typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of 25 - 30 dph, and the suggested yield for a residential scheme across the net developable area is 510 units. Having regard to the character of the area, the eastern part of the site could also be developed for low/medium density employment development typically comprising a mix of single storey/two storey offices, light industrial and medium format warehousing units, with landscaped buffer areas to residential development."***

Land West Draycott Crescent (site ref CAM013) has a net site area of 25ha. According to the site assessment it has a net developable area 18ha with a proposed residential use and a potential to accommodate 510 houses. The site is considered to be developable as a medium density development comprising of a mix of detached, semi-detached and terraced dwellings at an average density of 25-30 dph.

The SALA assessment for CAM 025 in 2018 concludes:

***"Taking account of the character of the site and its surroundings, this site could be developed for medium density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of 25 - 30 dph, and the suggested yield for a residential scheme across the net developable area is around 100 units. Taking account of the character of the site and its surroundings, employment development, typically comprising single storey/two storey offices or light industrial units may be able to be accommodated adjacent to the A4135/ M5 as part of a mixed development, subject to appropriate buffers to protect the amenities of residential areas."***

Physical constraints for both sites identified as a part of the assessment are limited. In both cases, the sites are flat, with no ground contamination or land stability issues.

The sites are accessible by public transport services (bus stops in close proximity). The 2018 SALA states that for CAM 025 states that the site would require a new access off the A4135.

The section entitled "Potential impact summary" of the assessment indicates that there is potential to develop both sites without harm to designated heritage assets.

As identified in the Sustainability Appraisal Report for the Stroud District Local Plan Review 2017, both sites are located within a larger land parcel identified in the Landscape Sensitivity Assessment as Medium/ Low sensitivity to housing uses and Medium sensitivity to employment uses.

On the behalf of our clients we support the Identification of PS24 i.e. both parcels of land that comprises PS24 (SALA ref CAM025 and CAM013) as suitable, available and deliverable

site for a development due to its location, access to services and facilities, limited physical constraints that can be brought forward for development without harm to biodiversity and heritage assets. Both sites are suitable for residential development, are achievable in economic viability terms and would strongly contribute to the emerging growth strategy in delivering the provision of at least 12,800 additional dwellings in the district over the plan period.

We would like to remain on the consultation database and receive future correspondence as the Local Plan review progresses.

If you have any queries in respect of the response, please do not hesitate to contact me.

Yours faithfully

**Regional Director**

Email:

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