**Persimmon Homes Severn Valley**

**Planning Statement**

Land at Draycott, Cam

Stroud

July 21

Contents

[1. Introduction 1](#_Toc38436150)

[2. Site Description 3](#_Toc38436151)

[3. Planning History 4](#_Toc38436152)

[4. Development Proposal 5](#_Toc38436153)

[5. Relevant Planning Policy 6](#_Toc38436154)

[6. Planning Assessment 24](#_Toc38436155)

[7. Conclusion 27](#_Toc38436156)

Tables of Figures

[Figure 1: Planning Application History 4](#_Toc71543161)

[Figure 2 Open Space Provision Standards 23](#_Toc71543162)

# 1. Introduction

1.1 This Planning Statement has been prepared in support of a hybrid planning application submitted by Persimmon Homes Severn Valley (PHSV), for up to a total of 795 dwellings, comprising 231 dwellings in full application and the balance of up to 564 in outline application.

1.2 This Planning Statement sets out the relevant background of the site as well as the details of the proposed development. The statement includes an assessment of the relevant planning policy prescribed in the development plan and within material considerations such as the National Planning Policy Framework (NPPF). The statement will demonstrate that in considering the above, the site is policy compliant and planning permission should be granted for residential development on the site.

1.3 This Planning Statement should be read in conjunction with the following documents and plans:

Outline and Full:

* Planning application form;
* Design and Access Statement
* Site Location Plan
* Illustrative Masterplan
* Affordable Housing Statement
* Statement of Community Involvment
* Sustainability Checklist
* Environmental Statement including:
  + - Air Quality Assessment
    - Heritage Assessment
    - Ecological Assessment
    - Flood Risk Assessment and Drainage Strategy
    - Ground Investigation
    - Noise Impact Assessment
    - Transport Assessment & Travel Plan
    - Landscape and Visual Impact Assessment
    - Arboricultural Assessment
    - Parameter Plans
    - Climate Change Assessment
    - Socio-economic Assessment
  + Biodiversity Net Gain Calculations
  + Capacity Analysis
  + Utility Search Report

Full only:

* CIL Forms
* Layout
* House Type Pack (elevations and floor plans)
* Street Scenes
* Detailed Drainage Strategy
* Detailed POS Softworks Plan
* On-plot Softworks Plan
* Materials Plan
* Affordable Housing Plan
* Fences and Enclosures Plan
* LEAP Plan
* Concept Engineering Sections
* Character Areas Plan
* Storey Heights Key Plan
* Refuse Vehicle Tracking & Visibility Splays
* Car Parking Schedule

# 2. Site Description

2.1 The 39.03 hectare (ha) site is located on the western side of the towns of Draycott and Cam within the Stroud District of Gloucestershire. Cam adjoins the town of Dursley to the south, and together they make up the second largest population in the Stroud District.

2.2 The site is located approximately 11km to the south west of Stroud and 19km south of Gloucester and sits at the edge of the Cotswold Area of Outstanding Natural Beauty (AONB).

2.3 The site lies outside of restrictive designations, and is located in Flood Zone 1, the Environment Agency’s lowest category of flood risk.

2.4 Cam and Dursley are a focus for the South Vale area of Stroud District with a concentration of services, facilities, jobs and infrastructure, including the Cam and Dursley train station on the main Bristol-Birmingham railway line which is located approximately 0.5km to the east of the site.

2.5 The site lies to the west of the A4135 which links the site to the surrounding villages to the north, and to the centre of Cam and Dursley further to the south. The site is also adjacent to the M5 with Junction 15 (Stroud) and Junction 14 (Dursley) located 5km to the north and 10km to the south respectively.

2.6 The site is therefore ideally located to provide sustainable residential development to serve the anticipated growth in the area and to take advantage of the existing and future road, footpath and rail network.

# 3. Planning History

3.1 There is no planning history on site.

3.2 As discussed further later in this statement, the site forms part of a draft strategic allocation in the emerging Stroud District Council Local Plan Review [PS24], which is an allocation that is currently proposed for 900 homes, a primary school, strategic landscaping and green infrastructure and associated community and open space uses. The draft Local Plan identifies Cam as one of a number of District settlements that are to be the primary focus of growth and development in Stroud District because of its excellent transportation infrastructure and role as a jobs and service centre.

# 4. Development Proposal

4.1 A hybrid application is submitted for up to 795 dwellings, consisting of a Full planning application for a residential led development of 231 dwellings and an Outline planning application for the balance up to 564 dwellings. The scheme comprises a mix of 2, 3 and 4 bedroom dwellings, with majority consisting of 3 bedroom units, reflective of identified local needs. In line with policy, the scheme proposes 30% affordable housing.

4.2 The proposed development will be a 3 phased development. Phase 1 consists of the Full application land in addition to the parcel of land set out for either a school or residential development in the Outline application. Phases 2 and 3 consist solely of land from the Outline application.

4.3 The proposal contains 2 Local Equipped Areas for Play (LEAP) and 1 Neighbourhood Equipped Area for Play (NEAP).

4.4 Access to the development will be achieved via a new tee junction off of A4135. New car parking will be built to serve the Jubilee sport pitches and the wider community.

4.5 Extensive public consultation has been carried both online and via leaflet and pre-application advice has been garnered in an effort to inform the development proposals.

4.6 Pre-application advice was sought for over year, but was not possible due to a lack of resources on the Council’s behalf. Informal meetings and discussions were held in place of this.

4.7 The Parish Council was presented with the initial concept masterplan on the 9th October 2019. Some of the main comments were:

* The need for a car park to serve the existing playing fields
* The addition of allotments on site.

4.8 In June 2020, a scoping request was submitted for up to 1,100 dwellings, a new primary school, strategic landscaping, green infrastructure and other associated infrastructure. The decision was that an EIA was required.

4.9 In January and February 2021, pre-application public consultation took place. Leaflets were distributed in the surrounding area and a consultation website was set up, available at <https://sites.google.com/view/northwestcam>.

# 5. Relevant Planning Policy

5.1 This chapter identifies the relevant policies applicable to the development including the current development plan and material considerations.

*The Development Plan*

5.2 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.3 The adopted development plan comprises the Stroud District Local Plan, adopted in November 2015, and several Neighbourhood Plans that that now form a component of the Development Plan. In regards to this application, it is the Cam Neighbourhood Plan that is of relevance.

Stroud District Local Plan (November 2015)

5.4 The Stroud District Local Plan was adopted on the 19th November 2015, and contains a series of policies that determines how, where and when various kinds of development will be distributed around the district, including the provision of new homes and employment land. The Development Strategy is articulated through a number of ‘Core Policies’ and ‘Delivery Policies’, with the relevant policies to this application listed below:

5.5 **Core Policy CP1** states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development, as contained in the National Planning Policy Framework. The policy states the Council will work proactively to approve proposals wherever possible providing it improves the economic, social and environmental conditions in the area

5.6 **Core Policy CP2** sets a housing target of at least 11,400 dwellings to be provided in the period between up to 2036. The policy identifies strategic sites as the primary location for growth. Outside of strategic sites, development will take place in accordance with the settlement hierarchy as set out in the subsequent paragraph.

5.7 **Core Policy CP3** states that proposals for new development should be located in accordance with the District’s settlement hierarchy. Cam and Dursley is identified as a first tier settlement (the primary focus for growth and development). The policy continues by establishing that one of the primary aims of a settlement hierarchy is to promote sustainability by bringing housing, jobs and services closer together to reduce the need to travel for services elsewhere.

5.8 **Core Policy CP4** sets out that all development proposals shall accord with the Mini-Visions and have regard to Guiding Principles for that locality. Development will be expected to:

1. Integrate into the neighbourhood (taking account of connectivity, be located close to appropriate levels of facilities and services, reduce car dependency, improve transport choice, support local community services and facilities and meet local employment or housing requirements in terms of mix, tenure and type)
2. Place shape and protect or enhance a sense of place; (create a place with a locally-inspired or distinctive character – whether historic, traditional or contemporary – using appropriate materials, textures and colours, locally-distinctive architectural styles, working with the site topography, orientation and landscape features; as well as protecting or enhancing local biodiversity, the historic environment and any heritage assets)
3. Create safe streets, homes and workplaces (where buildings are positioned with landscaping to define and enhance streets and spaces, assist finding your way around with focal points or landmarks, provide permeability, reduce car domination of the street and reduce vehicle speeds, provide shared or social spaces on the streets (where appropriate), create safe well managed attractive public and private amenity spaces, and provide adequate external storage space for waste bins, recycling materials and bicycle storage).

5.9 **Core Policy CP5** relates to the environmental development principles for strategic sites. Strategic sites will:

1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms.
2. Be low impact in terms of the environment and the use of resources
3. Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars
4. Have a layout, access, parking, landscaping and community facilities in accordance with an approved indicative masterplan
5. Be located to achieve a sustainable form of development and/or support regeneration. Development proposals should incorporate a negotiated design code/framework.

Applications for strategic sites will also need to show how the proposal maximises its contribution to:

1. Sustainable sourcing of materials and their efficient and appropriate use, including their durability
2. Minimising waste and maximising recycling
3. Incorporating Sustainable Drainage Systems
4. Minimising water consumption
5. Minimising energy consumption and improving energy performance
6. Minimising net greenhouse gas emissions of the proposed development
7. Maximising low or zero carbon energy generation.
8. Minimising impacts on the natural environment and maximising green infrastructure

5.10 **Core Policy CP6** concerns infrastructure and developer contributions and that the Council will require the developer to make a proportionate contribution to the overall cost of such provision through a legal agreement and/ or Community Infrastructure Levy.

5.11 **Core Policy CP7** regards Lifetime Communities and ensures that new housing development contributes to the provision of sustainable and inclusive communities. Proposals will need to demonstrate how the following needs have been taken into account:

1. An ageing population, particularly in terms of design, accessibility, health and wellbeing service co-ordination
2. Children, young people and families
3. People with special needs, including those with a physical, sensory or learning disability, dementia, or problems accessing services and
4. The specific identified needs of minority groups in the District.

Proposals will need to demonstrate how the factors below have informed the development proposal:

1. Lifetime accommodation
2. Contribution to meeting the needs of those with an existing long standing family, educational or employment connection to the area.

5.12 **Core Policy CP8** states that the design of new housing development must address local housing needs, incorporating a range of different types, tenures and sizes of housing and should take account of the District’s housing needs as set out in the Strategic Housing Market Assessment. In addition to this residential development proposals will need to:

1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms
2. Have a layout that supports accessibility by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities or contribute towards provision of new sustainable transport infrastructure to serve the area
3. Have a layout, access, parking, landscaping and community facilities that are appropriate to the site and its surroundings
4. Use sustainable construction techniques and provide renewable or low carbon energy sources in association with the proposed development and
5. Enable provision of infrastructure in ways consistent with cutting greenhouse gas emissions and adapting to climate change and its consequences.

5.13 **Core Policy CP9** concerns affordable housing provision in the district and states there is an overall unadjusted need for 446 affordable dwellings per annum. Core Policy CP9 sets a minimum of 30% affordable housing on residential developments of at least 4 dwellings.

5.14 **Core Policy CP13** is in relation to sustainable travel measures and in all development cases, proposals shall:

1. be located where there are, or will be, at the time of development, choices in the mode of transport available and which minimise the distance people need to travel
2. provide appropriate vehicular parking, having regard to car ownership and the Council’s adopted standards
3. not be detrimental to and, where possible, enhance road safety and
4. not cause or contribute to significant highway problems or lead to traffic related environmental problems.

5.15 **Delivery Policy EI12** requires all development proposals to have full regard to the traffic impact on the local highway network. The policy also refers to the vehicular parking standards as set out in Appendix 2 of the Stroud Local Plan, for which residential dwellings (Use Class C3), is on average 1.5 spaces per dwelling.

5.16 **Delivery Policy EI16** concerns the provision of public transport facilities. Development proposals should cater for the needs of bus and taxi operators where appropriate. Layouts should encourage operational efficiency, maximise likely bus passenger traffic and include ancillary facilities, such as shelters and seating for users.

5.17 **Core Policy CP14** regards high quality sustainable development and schemes will be supported where it achieves the following:

1. Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production
2. No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status
3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure
4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development
5. An appropriate design and appearance, which is respectful of the surroundings, including the local topography, built environment and heritage
6. Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable
7. No unacceptable adverse effect on the amenities of neighbouring occupants
8. Contributing to the retention, conservation and enhancement of important landscape and geological features and biodiversity interests (including ecological networks resilient to current and future pressures and where appropriate contribute to green infrastructure)
9. Contributing to a sense of place both in the buildings and spaces themselves and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity net gain, appropriate open space, sport and amenity space provision
10. A design and layout that aims to assist crime prevention and community safety, without compromising other design principles
11. Efficiency in terms of land use, achieving higher development densities in locations that are more accessible by public transport and other non-car modes and where higher densities are compatible with the character of the area and the setting of the development
12. It is not prejudicial to the development of a larger area in a comprehensive manner
13. Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport
14. It is at a location that is near to essential services and good transport links to services by means other than motor car.

5.18 **Delivery Policy ES1** of the Stroud Local Plan highlights the importance of sustainable design and construction and how this is integral to new development in the District. As part of this, applications for development should be accompanied by a Stroud District Sustainable Construction Checklist.

5.19 **Delivery Policy ES3** sets out that permission will not be granted to developments which are likely to lead to:

1. Noise, general disturbance, smell, fumes, loss of daylight or sunlight, loss of privacy or an overbearing effect
2. Environmental pollution to water, land or air and an unacceptable risk to the quality and quantity of a water body or water bodies
3. Noise sensitive development in locations where it would be subject to unacceptable noise levels
4. Increased risk of flooding on or off the site, and no inclusion of measures to reduce the causes and impacts of flooding
5. A detrimental impact on highway safety
6. An adverse effect on contaminated land where there is a risk to human health or the environment.

5.20 **Delivery Policy ES4** concerns water resources, quality and flood risk. The policy states that new developments shall incorporate appropriate Sustainable Drainage Measures (SuDS) in accordance with National Standards. In addition, development will:

1. Conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments
2. Open up any culverted watercourse where safe and practicable to create an asset of ecological and community value
3. Improve water efficiency through incorporating appropriate water conservation techniques including rainwater harvesting and grey water recycling
4. Discharge surface run-off, not collected for use, to one or more of the following, listed in order of priority:
5. discharge into the ground (infiltration); or, where not reasonably practicable
6. discharge into a surface water body; or, where not reasonably practicable
7. discharge to a surface water sewer, highway drain, or other drainage system; or, where not reasonably practicable
8. discharge to a combined sewer
9. Connect to the main foul sewer network where possible
10. Use the natural environment including woods and trees to deliver sustainable water issue solutions.

A chapter on Climate Change and a Flood Risk Assessment are included in the accompanying Environmental Statement. Details are included within regarding proposed sustainable drainage features at the site.

5.21 **Delivery Policy ES5** sets out that development proposals which are likely to exacerbate existing areas of poorer or marginal air quality, will need to demonstrate measures can be taken to effectively mitigate emission levels.

5.22 **Delivery Policy ES6** in relation to providing for biodiversity and geodiversity states that all new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value. The policy continues by saying that all developments should also enable and not reduce species’ ability to move through the environment in response to predicted climate change, and supports development that enhances existing sites and features of nature conservation (including wildlife corridors and geological exposures). The accompanying Environmental Statement considers biodiversity matters on site.

5.23 **Delivery Policy ES7** states that in all locations development proposals should conserve or enhance the special features and diversity of the different landscape character types found within the District. Development will only be permitted if all the following are met:

1. The location, materials, scale and use are sympathetic and complement the landscape character; and
2. Natural features including trees, hedgerows and water features that contribute to the landscape character and setting of the development should be both retained and managed appropriately in the future.

The accompanying Landscape and Visual Assessment within the Environmental Statement addresses both the NPPF and development plan policies and demonstrates that the proposals do not have an adverse impact of local landscape character.

5.24 **Delivery Policy ES8** concerns trees, hedgerows and woodlands. Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of protected trees, hedgerows, community orchards, veteran trees or woodland (including those that are not protected but are considered to be worthy of protection) will not be permitted. Where loss is considered acceptable, adequate replacement will be required.

5.25 **Delivery Policy ES10** places value on the historic environment and assets in the district. It states that Stroud District’s historic environment will be preserved, protected or enhanced. Any proposals involving a historic asset shall require a description of the heritage asset significance including any contribution made by its setting, and an assessment of the potential impact of the proposal on that significance, using appropriate expertise. This can be a desk based assessment and a field evaluation prior to determination where necessary and should include the Gloucestershire Historic Environment Record.

5.26 **Delivery Policy ES12** requires the layout and design of new development to create well-designed, socially integrated and high quality places. This includes safe attractive public spaces, secure private areas and better designed buildings and landscaped spaces. The Council will require the submission of a Design and Access Statement which clearly demonstrates the design and suitability of the proposal in its local context where necessary.

5.27 **Delivery Policy ES13** recognises the importance of open spaces. Development proposals shall not involve the loss of open space within settlements unless it is supported by a robust assessment showing a surplus of open space in the catchment area or a replacement facility.

5.28 **Delivery Policy ES14** states that major residential developments shall be accompanied with additional accessible natural green space, proportionate to the scale of development. This will be provided to achieve the following target rates:

* Provision of at least 2ha of accessible natural green space per 1,000 population
* Provision of at least one accessible 20 hectare site within two kilometres of home;
* Provision of one accessible 100 hectare site within five kilometres of home; and
* No person should live more than 300m (or 5 minutes walk) from their nearest area of natural green space of at least 2 hectares in size.

5.29 **Delivery Policy ES15** follows on from the previous policy and seeks to achieve a standard of 2.4ha of public outdoor playing space per 1000 population. This can be subdivided into the following categories:

* Youth and Adult Facilities including Multi Use Games Area at 1.6 ha per 1000 population
* Playing Pitches 1.2 ha per 1000 population (sitting within the Youth and Adult Facilities Standard)
* Equipped Play Space for Children and Young People at 0.2 – 0.3 ha per 1000 population
* Local Area of Play (LAP)/ Local Equipped Area for Play (LEAP)/ Neighbourhood Equipped Area for Play (NEAP) at 0.4 – 0.5 ha per 1000 population.

5.30 **Delivery Policy ES16** sets out the requirement for proportionate contributions for major residential schemes.

Cam Neighbourhood Plan

5.31 The Cam Neighbourhood Plan’s examination stage concluded on 20th February 2020, with the examiner recommending the Plan go to referendum, once the recommended amendments were made. The referendum took place on the 6th May 2021. 85% voted yes and the Neighbourhood Plan is set to be adopted.

5.32 Draycott and surrounds is listed as one of the eight distinct character area in Cam.

5.33 **Policy CAMES1** states development adjacent to, or containing Green Infrastructure network assets should protect and where feasible improve and extend the network.

5.34 **Policy CAMES2** underlines that development proposals should, where appropriate, have regard to the scale of the proposal and any potential impacts on the wider landscape, demonstrate an informed sensitive design in response to local landscape characteristics and how Cam Design Code principles have been used to inform design.

5.35 **Policy CAMCD1** encourages development proposals in Cam Parish to have an appropriate design analysis and statement, which reinforce positive locally distinctive characteristics.

5.38 **Policy CAMCD3** reinforces the Parish’s desire for sustainable design and construction.

5.39 **Policy CAMCD4** states that applications that have demonstrably consulted with the community early, proactively and effectively will be looked on more favourably.

5.40 **Policy CAMMC1** pertains to the maintenance and improvement of pedestrian, cycling and public transport routes, where proposals that deliver this will be supported.

5.41 **Policy CAMCF1** concerns the protection of existing local facilities and services, while also encouraging ample provision of new ones as part of new development.

5.42 **Policy CAME1** relates to the encouragement for home office working to be considered by house builders.

5.43 The Design and Access Statement (DAS) sets out the key design objectives for the development, which are closely aligned with the objectives of the emerging Cam Neighbourhood Plan. For example, the key objective to ‘provide safe and convenient connections’ relates closely to the Movement and Connectivity objectives O8, O9 and O10, by aiming to create attractive, accessible connections for pedestrian and cyclists across the development.

*Material Considerations*

5.44 National Policy is prescribed within the National Planning Policy Framework (NPPF), which provides the principle material consideration relevant to this application.

National Planning policy Framework (NPPF) (February 2019)

5.45 The revised NPPF was published in February 2019 and retains the fundamental principal of sustainable development. The following extracts are directly relevant to the determination of this planning application:

5.46 **Paragraph 2** states that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.47 **Paragraph 7** underlines the fundamental purpose of the framework is to contribute to the achievement of sustainable development. Paragraph 8 subsequently highlights the three overarching elements of sustainable development, pursuing an economic, social and environmental objective.

5.48 **Paragraph 10** establishes that at the heart of the NPPF is a presumption in favour of sustainable development.

5.49 **Paragraph 11** reiterates that plans and decisions should apply a presumption in favour of sustainable development. For decision taking, this includes approving development proposals that accord with an up-to-date development plan without delay.

5.50 **Paragraph 13** sets out that neighbourhood plans should support the delivery of strategic policies in local plans or spatial development strategies and should shape and direct development outside of these strategic policies.

5.51 **Paragraph 18** regards non-strategic policies, where policies addressing them should be included in local plans with strategic and non-strategic policies, and/or in local or neighbourhood plans that just contain non-strategic policies.

5.52 **Paragraph 19** states that the development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time.

5.53 **Paragraph 23** establishes that strategic policies should provide a clear strategy for bringing sufficient land forward at a sufficient rate to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.

5.54 **Paragraph 29** highlights the role of neighbourhood plans in shaping, directing and helping to deliver sustainable development.

5.55 **Paragraph 38** relates to decision making and states that decision-makers at every level should seek to approve applications for sustainable development where possible.

5.56 **Paragraph 48** states that local planning authorities may give weight to relevant policies in emerging plans according to:

1. The stage of preparation of the emerging plan;
2. The extent to which there are unresolved objections to relevant policies; and
3. The degree of consistency of the relevant policies in the emerging plan to this framework.

5.57 **Paragraph 59** supports the significant boosting of the supply of homes. This highlights the importance that a sufficient amount and variety of land can come forward where needed, and that the needs of groups with specific requirements are addressed and permission is not unnecessarily delayed.

5.58 **Paragraph 61** states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

5.59 **Paragraph 62** concerns affordable housing provision and that where there is an identified need, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:

1. Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
2. The agreed approach contributes to the objective of creating mixed and balanced communities

5.60 **Paragraph 67** regards the availability of land and that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. Planning policies should identify a sufficient supply and mix of sites, which should take into account their availability, suitability, and likely economic viability.

5.61 **Paragraph 74** states that a five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:

1. has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and
2. incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.

5.62 **Paragraph 91** supports the aim of achieving healthy, inclusive and safe places. This includes to:

1. promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages
2. are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and
3. enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

5.63 **Chapter 9** concerns sustainable transport and highlights the significance of transport policies in promoting sustainable forms of travel.

5.64 **Paragraph 103** acknowledges that significant development should be focussed on locations which are sustainable, but recognises that opportunities for sustainable transport solutions will vary between urban and rural areas.

5.65 **Paragraph 109** regards decision making andstates that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

5.66 **Paragraph 111** sets out that all developments that will generate significant amounts of movement should be required to provide a travel plan and transport statement/assessment. This Planning Statement is accompanied by a Transport Assessment which sets out that the proposed development can be safely and satisfactorily accommodated on the local transport network.

5.67 **Paragraph 117** states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions.

5.68 **Paragraph 122 and Paragraph 123** aim to achieve appropriate densities in developments. The former states that planning policies and decisions should support development that makes efficient use of land, with the latter highlighting the importance that where there is a shortage of land for meeting identified housing needs, planning policies and decisions avoid homes being built at low densities and ensure developments make optimal use of the potential for each site.

5.69 **Paragraph 127** concerns design and that planning policies and decisions should ensure that developments:

1. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
2. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
3. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
4. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
5. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
6. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.70 **Paragraph 170** states that planning policies and decisions should contribute to and enhance the natural and local environment by:

1. 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);
2. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
3. maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
4. minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
5. preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
6. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

5.71 **Paragraph 189** establishes that applications must describe the significance of any heritage assets affected, including any contribution made by their setting. A desk-based assessment, and where necessary a field evaluation, is required where a site on which development is proposed includes, or has potential to include, heritage assets with archaeological interest.

5.72 **Paragraph 196** sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Planning Practice Guidance (PPG)

5.73 The PPG was launched in March 2014 by the Department for Communities and Local Government (DCLG), now renamed the Ministry of Housing Communities and Local Government (MHCLG). The PPG sits alongside the NPPF and acts as a series of guidance notes to assist in the delivery and understanding of policies within the national framework.

5.74 The following section of the PPG is relevant to the determination of this planning application:

*Design: process and tools (October 2019)*

5.75 **Paragraph 001** of the above guidanceconcerns the achievement of well-designed places through the planning system. The guidance states that well-designed placed can be achieved by taking a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of the planning applications and the post approval stage.

5.76The National Design Guide was published in October 2019 and sets out the characteristics of well-designed places and demonstrates what good design means in practice. This guidance forms part of the planning practice guidance.

5.77 The design guide sets out 10 characteristics of good design:

* context
* identity
* built form
* movement
* nature
* public spaces
* uses
* homes and buildings
* resources
* lifespan

5.78 **Paragraph 012** states that Design and Access Statements (DAS) set out the narrative for the design approach and design rational for the scheme. They demonstrate how local character of an area has been taken into account and how design principles will be applied to achieve high quality design. They set out concisely how the proposal is a suitable response to the site and its setting, taking into account of baseline information.

*Emerging Policy*

Stroud District Local Plan Review, Draft Plan for Consultation

5.79 As stated above, paragraph 48 of the NPPF recognises that local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation.

5.80 The Stroud District Local Plan is currently undergoing the process of review and the Council published a Draft Plan for consultation in November 2019, with the consultation period having closed in January 2020. The Pre-Submission Stroud Plan (Regulation 19) was considered by the Council at a Full Council meeting in April 2021. The Local Plan review will cover a period from 2016-2036 and identifies a need of 12,800 new homes within this period. The policies referred to below relate to the Local Plan Pre-Submission Draft presented to the Environment Committee on 20th April 2021. The policies below relate to the Local Plan Review Pre-submission Draft released as part of Regulation 19 Consultation which began in May 2021 and is set to run until 21st July 2021.

5.81 A priority of the plan is to ensure new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development. To meet the housing target the draft plan identifies several draft site allocations.

5.82 Cam and Dursley is recognised as a Tier 1 settlement, as it has strong access to key services and facilities due to its transport infrastructure. As such they act as the primary focus for growth and development.

5.83 The proposed site is a draft allocation in Cam, identified as ‘PS24’. The site is allocated in draft for 900 dwellings, associated community and open space uses and strategic landscaping.

5.84 **Core Policy DCP1** sets out the target of Stroud District becoming Carbon Neutral by 2030.

5.85 **Core Policy CP2** states the figure of at least 12,600 new homes which will be provided over the plan period of 2020-2040.

5.86 **Core Policy CP5** concerns the environmental development principles for strategic sites. An additional objective is proposed; “H Minimising impacts on the natural environment and maximising green infrastructure”.

5.87 **Core Policy CP7** relates to the provision of inclusive communities, and sets out that the policy should apply to developments of 10 or more dwellings, or application sites of 0.5ha or larger.

5.89 **Core Policy CP8** considers new housing development and the amended policy states that the range, types, tenures and sizes of dwellings should reflect the housing needs identified for the respective Parish Cluster.

5.90 **Core Policy CP9** for affordable housing sets out the need for 424 dwellings per annum. For developments of 4 or more dwellings, the provision of affordable housing should be at least 30%.

5.91 **Core Policy CP13** for demand management and sustainable travel states that major schemes will be supported where they provide for a variety of forms of transport, improve the existing infrastructure network and mitigate any significant adverse effects upon the transport network. Proposed changes to the policy state that “Development proposals will be expected to consider all possible sustainable transport options before the capacity of the road network is increased”.

5.92 **Delivery Policy EI12** concerns the promotion of transport choice and accessibility. Proposed changes to the policy relate to sustainability by maximising opportunities to reduce the need for travel.

5.93 **Delivery Policy EI13** sets out that proposals that develop and extend the walking and cycling network will be supported and encouraged by the Council. Major development should provide new walking and cycling routes within the development and connect to nearby established and proposed walking and cycling routes. Development will not be permitted where it significantly harms an existing walking/cycling route or prejudices the future implementation of the following proposed routes:

1. The Eastington-Stroud-Chalford route (both the canal towpath route and the proposed Chalford to Stroud utility route)

2. The Eastington-Stonehouse-Nailsworth route

3. The Cam-Dursley-Uley route

4. The Wotton-Kingswood-Charfield route

5. Links between established and proposed walking and cycling routes within Stroud District and the National Cycle Network Route 41 (Bristol to Stratford) and Route 45 (Salisbury to Chester) which cross the District

6. Any part of the walking and cycling network highlighted through the Local Transport Plan or a district-wide walking and cycling strategy.

7. Any route identified as part of the regeneration of the Stroudwater canal and towpath

8. Any route identified through future cycling initiatives to create an integrated cycling network in the district.

5.94 **Core Policy CP14** refers to high quality sustainable development. Minor changes to the word of some points are changed and point 4 is changed to “Avoids areas at risk of flooding unless it is necessary and is made safe for its lifetime without increasing flood risk elsewhere”.

5.95 **Delivery Policy ES1** sets out the targets for sustainable construction and design, with a few changes, reinforcing how all new developments should achieve net zero carbon.

5.96 **Delivery Policy ES3** concerns the maintenance of quality of life within our environmental limits. Changes to the policy set out that development proposals will demonstrate that environmental risks have been evaluated and that appropriate measures have been taken to minimise the risks of adverse impact to air, land and water quality.

5.97 **Delivery Policy ES4** relates to water resources, quality and flood risk and changes to the policy set out development will consider measures to help bring the waterbody to a good ecological status.

5.98 **Delivery Policy ES5** concerns air quality. Proposed changes set out that development proposals which exacerbate existing areas of marginal air quality, as well as poorer air quality, will need to demonstrate effective measures for mitigation.

5.99 **Delivery Policy ES6** sets out the requirements for developments in terms of providing biodiversity and geodiversity. Developments shall now provide at least 10% net gain in biodiversity. The proposal will deliver in excess of 10% net gain, through retention and enhancement of existing green space and the creation of new woodland and grassland.

5.100 **Delivery Policy ES7** concerns landscape character and changes to the policy highlight that developments must avoid detrimental effects to the character, history and setting of a settlement/area.

5.101 **Delivery Policy ES8** regardstrees, hedgerows and woodlands and changes proposed reflect climate change mitigation and adaption and the need for no net loss of hedgerows.

5.102 **Delivery Policy ES10** relates to valuing historic environments and assets. The changes state that deliberate neglect of or damage to a heritage asset will not be viewed as a justification for loss or alteration,

5.103 **Delivery Policy ES12** considers the better design of places and change to the policy highlights the need for contribution to carbon neutrality.

5.104 **Delivery Policy DHC5** seeks to improve the health and wellbeing of local communities by supporting proposals that include design measures to encourage healthier lifestyles and sustainable neighbourhoods, in proportion to the scale of development. Any demonstrable adverse impact on the health and wellbeing of new or existing communities will need to be mitigated.

5.105 **Delivery Policy DHC7** sets out the need for new residential development to be accompanied with additional accessible recreational and natural green space, and built and indoor sports facilities, proportionate to the scale of development. The policy sets out the standards for this provision below:

|  |  |  |
| --- | --- | --- |
| **Topic/Typology (open space)** | **Quantity Standard** | **Access Standard** |
| Allotments | 0.35 ha/1000 population | 720m (15 minutes walk  time) for parishes with  over 1000 people |
| Community Orchards | 0.15 ha/1000 population  for new provision only | 720m (15 minutes walk  time) |
| Amenity Green Space | 0.40 ha/1000 population  (sites > 0.15ha) | 600m (12-13 minutes  walk time) |
| Parks and Recreation  Grounds | 1.20 ha/1000 population | 600m (12-13 minutes  walk time).  For parishes with less  than 1000 people this  could be met by an  amenity green space. |
| Childrens Play Space | 0.06 ha/1000 population | 480m (10 minutes walk  time) for parishes with  over 500 people) |
| Youth Play Space | 0.06 ha/1000 population | 720m (15 minutes walk  time) for parishes with  over 1000 people |
| Natural Green Space (ANGSt) | 1.0ha/1000 population  for new provision | 960m (20 minutes’ walk time) |
| Playing Pitches and  Outdoor Sports  Facilities (PPS) | 0.7ha/1000 population |  |
| **Total open space for**  **new provision** | **3.92ha/1000** |  |
| **Topic/Typology (built facilities)** | **Quantity Standard** | **Access Standard** |
| Indoor swimming  pools | 9.75 sq.m  waterspace/1000  persons |  |
| Sports halls | 0.27 courts/1000  persons |  |
| Health & Fitness  Suites | 6.3 health & fitness  stations/ 1000 persons |  |
| Small community hall | 1:1,800 people (or 0.55  halls/ 1000 persons) |  |

Figure 1 Open Space Provision Standards

Where possible, provision should be made on-site and link well with any existing green infrastructure network. Where provision in line with the standards is unrealistic or inappropriate, a financial contribution via legal agreement or Community Infrastructure Levy will be secured.

5.106 The policies of the emerging plan are subject to Regulation 19 consultation and the Plan will then be submitted to the Secretary of State for Examination. The development proposed at Land at Draycott, Cam is in line with the strategy of both the adopted Local Plan and the emerging Local Plan.

# 6. Planning Assessment

*Principle of Development*

6.1 As per the preceding chapter, paragraph 2 of the NPPF states that planning law requires applications for planning permission to be determined with the development plan, unless material considerations indicate otherwise. Paragraph 48 of the NPPF states that local planning authorities may give weight to relevant policies in emerging plans according to three factors including the stage of preparation of the emerging plan.

6.2 The site is allocated as a draft allocation in the Stroud District Local Plan Review, Draft Plan for Consultation for up to 900 dwellings and contributes to the local plan review’s housing target for the plan period.

6.3 The site is in a sustainable location as identified in Core Policy CP3 of the Stroud Local Plan Review, Draft Plan for Consultation, with Cam and Dursley and other Tier 1 settlements having good access to key services and links to satellite communities, therefore making them the primary focus for growth.

6.4 There are a range of services and facilities within a 15 minute walk of the site. The site is well served by bus routes, with routes 60, 61, 62 and 65 all currently stopping around the site, providing links to Gloucester, Dursley, Thornbury, Bristol via Sharpness and Stroud. Moreover, the train station to the north is within a 10 minute walk. Schools are also located a 15 minute walk from the site.

*The Proposal*

6.5 As demonstrated in the proposed layout, the development will provide up to 795 dwellings together with associated parking, open space, landscaping and associated infrastructure. The development will comprise a mixture of dwelling types, tenures and sizes, ranging from two to five bedroom, reflective of the District’s housing needs as set out in the Strategic Housing Market Assessment (SHMA) and in compliance with Stroud Core Policy CP8.

6.6 The proposal up to 795 dwellings is in accordance with NPPF paragraphs 122 and 123, and Stroud Core Policy CP8 and CP14 in regards to making efficient use of land and ensuring developments avoid low densities and make optimal use of the potential of each site.

6.7 The Design and Access Statement provides an analysis of the immediate context of the site and the rationale for the design of the proposed development. The proposed development is compliant with Core Policy CP4, reflective of the local character of Cam and Dursley and reflective of local densities in the area.

6.8 An Affordable Housing Statement is provided in support of this application and details that this development will provide Core Policy CP9 compliant 30% affordable housing.

*Factors in support of development*

*Transport*

6.9 As stated, the site is located on the western side of the towns of Draycott and Cam and is in close proximity to a range of services, facilities and bus stops serving the wider area. A Transport Statement prepared by Jubb is submitted as part of this application.

6.10 The Transport Statement concludes that the proposed access is considered safe and appropriate and the traffic generated by the development is able to be adequately served by a single point of access. Emergency, bollarded access points have been incorporated into the design to enable effective connectivity in case of emergency.

6.11 Sustainable forms of travel are promoted through the design of the proposed development, with green corridors (snickets) providing greater permeability across the site.

*Flood Risk and Drainage*

6.12 A Flood Risk Assessment (FRA) in addition to a drainage strategy was prepared by Wallingford HydroSolutions and is submitted as part of this application. The FRA confirms that the site is within Flood Zone 1.

6.13 Surface water drainage will discharge into 3 attenuation ponds, with 1 in the northern section of the site by the M5, and 2 in the southern section. A swale system throughout the site will also service the attenuation requirements of the development. The attenuation ponds will enable each phase of development to be served without relying on future phases. A pumping station is proposed for phase 3.

*Landscape and Visual Impact*

6.14 The application is supported by a Landscape and Visual Impact Assessment (LVIA), prepared by MHP Design.

6.15 The LVIA confirms the site is not covered by any natural environment or heritage designation, or located in a designated landscape. There are a number of public rights of way that traverse the site. While it does not sit within the Cotswolds Area of Outstanding Natural Beauty (AONB) it is visible from within the AONB. As such, the LVIA has considered the AONB Management Plan.

6.16 The effects on the landscape of the construction phase have been assessed to have Moderate Adverse effects on the landscape and visual receptors, albeit temporarily.

6.17 The site is bound by urban features to the north, south and partially to the east which acts to contain the site to a degree, with the proposed development an extension of the surrounding context. The LVIA acknowledges that the proposed green infrastructure and restoration of boundary hedgerows will assist in limiting views and breaking up the mass of development.

*Arboriculture*

6.18 An arboricultural survey, impact assessment and protection plan were undertaken by MHP Arboricultural Consultants. The survey found that the site is not designated as Ancient Woodland and nor are there any trees with Ancient, Veteran or Notable special status. Several hedgerows were found that may have the potential to qualify as ‘important’ as per the Hedgerow Regulations 1997.

6.19 The Arboricultural Impact Assessment (AIA) noted that the design process has been highly effective in minimising impacts on existing trees. The impacts are limited to the removal of low-quality trees and trees unsuitable for retention in the current site context.

*Ecology*

6.20 Ecology surveys were undertaken by Engain. In May 2020 habitat and vegetation surveys were carried out, which included a Phase 1 Habitat Survey and the identification of National Vegetation Classification types.

6.21 The site does not fall under any statutory nature conservation designations.

6.22 While the site is located between a greater horseshoe roost at Woodchester Park SSSI and the Wye Valley and Forest of Dean Bat Sites Special Area of Conservation (SAC), the low numbers of horseshoe bat registrations and the nature of the site also indicate it is unlikely to be a key commuting route.

6.22 The existing hedgerow network, used for foraging and commuting by bat species and nesting for birds, has limited ecological quality. As such, the strengthening and extension of the hedgerow network allows for the delivery of enhanced biodiversity.

6.23 SuDS features will provide opportunities for recreational, visual and ecological benefit, which will contribute towards a biodiversity net gain of greater than 10%.

*Archaeology and Heritage*

6.24 A desk-based heritage assessment was undertaken by Wessex Archaeology. The assessment found that the proposal would not be anticipated to have any physical effects on any designated heritage assets. The assessment also found that the site had the potential for the presence of buried archaeological remains, to be investigated in further archaeological works.

6.25 A baseline archaeological assessment was also undertaken by Wessex Archaeology. The assessment comprised the excavation, investigation and recording of 79 trial trenches (a 2% sample). 19 trenches contained archaeological features, with two discreet concentrations. These findings corresponded well with the geophysical survey, suggesting the survey can be used reliably for developing onsite mitigation strategies, if necessary.

*Noise*

6.26 Noise level modelling was undertaken by LFAcoustics. Modelling was carried out for baseline day and night time scenarios, based on multiple surveys carried out on site in 2018.

6.27 The results of the modelling necessitated the implementation of a noise mitigation which consists of an earthworks bund, with an acoustic fence positioned on the top, of a total 3-4m height.

6.28 When mitigation in the form of bunding was accounted for, the modelling showed significant reduction levels in future years.

*Deliverability*

6.29 The proposal is in accordance with the NPPF and the three overarching elements of sustainable development. The site will provide market and affordable housing in a sustainable location and is available and deliverable within the period of the local plan review, a key requirement in the Council’s ability to demonstrate a five year supply of housing.

# 7. Conclusion

7.1 This Planning Statement has been prepared in support of a hybrid planning application submitted by Persimmon Homes Severn Valley (PHSV), for up to a total of 795 dwellings, comprising 231 dwellings in full application and the balance comprising 564 in outline application, with access, associated parking, open space, landscaping and associated infrastructure on Land at Draycott, Cam.

7.2 The application is accompanied by a number of supporting documents as required in the Council’s Validation Checklist and agreed with the Council prior to submission.

7.3 The proposed development is in accordance with the NPPF’s three overarching aspects of sustainable development; to achieve an economic, social and environmental objective. The development also increases the supply of housing in Stroud District, as per the spatial strategy set out in the adopted Local Plan.

7.4 It is also set out in the NPPF in Paragraph 11, that decisions should apply a presumption in favour of sustainable development. For decision making, this means that development proposals that accord with an up-to-date development plan should be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless:

1. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
2. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

7.5 The Stroud Local Plan is currently in the process of review in which the site is allocated as a draft allocation for 900 dwellings in Local Plan Review, Draft Plan for Consultation.

7.6 The site is not constrained by restrictive designations and has the capacity for up to 795 dwellings. The site is available and deliverable to contribute to the new housing target as set in the Local Plan Review.

7.7 The site is sustainably located within close proximity to a range of services and facilities such as primary school, supermarkets, medical centres and playing fields and is within walking distance to public transport nodes with bus stops serving the wider area.