

APPLICATION FOR OUTLINE PLANNING PERMISSION FOR RESIDENTIAL DEVELOPMENT (UP TO 235 DWELLINGS), VEHICULAR, PEDESTRIAN AND CYCLE LINKS, STRATEGIC LANDSCAPING AND GREEN INFRASTRUCTURE INCLUDING AREAS OF INFORMAL AND PUBLIC OPEN SPACE AND OTHER ASSOCIATED SITE INFRASTRUCTURE AND COMMUNITY USES. ASSOCIATED WORKS INCLUDING DEMOLITION OF EXISTING BUILDINGS AND STRUCTURES. VEHICULAR ACCESS FROM THE A4135, CAM

PLANNING STATEMENT (INC. AFFORDABLE HOUSING STATEMENT AND DRAFT HEADS OF TERMS)

LAND AT CAM NORTH WEST

ON BEHALF OF ROBERT HITCHINS LTD. AND ITS SUCCESSORS IN TITLE TO THE LAND

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. INTRODUCTION

1.1 This Planning Statement has been prepared by Pegasus Group on behalf of Robert Hitchins Limited and its successors in title to the land, in support of proposals for outline planning permission for a residential development on land West of Draycott, Cam. The development comprises the following:

- Application for outline planning permission for residential development (up to 235 dwellings), vehicular, pedestrian and cycle links, strategic landscaping and green infrastructure including areas of informal and public open space and other associated site infrastructure and community uses. Associated works including demolition of existing buildings and structures. Vehicular access from the A4135.

1.2 This application is for a part of the proposed allocation at Cam North West (Policy reference PS24). Persimmon Homes is submitting a parallel application for the remainder of the proposed allocation. Documents common to both applications are the Framework Plan, the Design and Access Statement, the Statement of Community Involvement and the Environmental Statement.

1.3 This Planning Statement provides an overview of the decision-making context including the National Planning Policy Framework (February 2019), the National Planning Practice Guidance, the adopted Stroud Local Plan (November 2015), the emerging Stroud District Local Plan and the emerging Cam Neighbourhood Plan.

1.4 This Statement takes the following form:

- Section 2 describes the Application Site and the surrounding area;
- Section 3 provides a summary of the planning history of the site
- Section 4 sets out the application proposals
- Section 5 describes the relevant national and local planning policy
- Section 6 comprises the Affordable Housing Statement
- Section 7 discusses the planning merits of the proposal
- Section 8 provides the overall conclusions

1.5 The application is accompanied by a number of supporting documents including the Environmental Statement, which are to be read alongside this planning statement.

- 1.6 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) require that any proposed development falling within the description of a 'Schedule 2 development' within the meaning of the Regulations, is required to be subject to an EIA where such development is likely to have 'significant' effects on the environment by virtue of such factors as its nature, size or location (Regulation 2(b)).
- 1.7 The Application Site area is greater than the threshold of development area of 'exceeding 5ha' under Schedule 2 Section 10 (b) with respect to Urban Development Projects that may require the submission of an ES.
- 1.8 A Scoping Report was submitted to Stroud District Council on 9th June 2020.
- 1.9 A Scoping Opinion was received 24th November 2020. These matters are addressed in the Environmental Impact Assessment.

2. APPLICATION SITE AND SURROUNDINGS

- 2.1 The site is located to the North West of Cam, between the A4135 and the M5 and comprises part of the emerging allocation in the Stroud Local Plan (PS24 Cam North West in the Pre-Submission Draft Stroud Local Plan – May 2021). The emerging allocation is for a residential mixed use development, a primary school (if required), strategic landscaping and green infrastructure and associated infrastructure.
- 2.2 Separate outline applications are being prepared on behalf of Robert Hitchins Ltd and Persimmon Homes Severn Valley in respect of site PS24 Cam North West.
- 2.3 This application is for the area to the north comprising approximately 9.70 hectares (excluding highway land). The site is bounded by the A4135 to the east, the main Bristol - Birmingham railway line to the north and the M5 motorway to the north west. The site has a strong hedged boundary to the A4135. The area is divided into smaller fields with hedged boundaries and occasional specimen trees and adjoins other grazing land to the south and west. A public footpath runs west from the A4135 along the northern site boundary and south across the south west corner of the site. Access is off the A4135.
- 2.4 To the south west is the remaining part of the proposed allocation which is the subject of a planning application which is being made by Persimmon Homes Severn Valley.
- 2.5 The topography of the land is relatively level with a gradual slope downwards towards the north of the site. The land varies in agricultural land value, varying between 3a and 4 (based upon review of DEFRA maps).
- 2.6 There are no known statutory designations on the land. The nearest listed buildings include Wooded Green Farmhouse (Grade II), located approximately 300m to the south and Goods Shed at Coaley (Grade II) approximately 200m to the north.
- 2.7 The site lies outside of restrictive environmental designations, and is located in Flood Zone 1, the Environment Agency's lowest category of flood risk.
- 2.8 The Cotswolds Area of Outstanding Natural Beauty (AONB) sits to the south and west of Dursley and is over 1.5km from the site. In addition, the site lies within

the Severn and Avon Vales National Character Area and is within the Settled Unwooded Vale character type.

- 2.9 There are a wide range of facilities and services within close proximity of the site including Jubilee Fields (recreation, playing fields and skate park) to the south of the proposed allocation (PS24). Cam and Dursley train station is approximately 500m north east of the site with services to Bristol, Gloucester and Birmingham. Furthermore, shops and services of Draycott and Cam are located along the A4135.
- 2.10 The proposed development can be readily served by utilities.
- 2.11 Cam and Dursley adjoin each other and make up the District's second largest population (after the Stroud Valleys), together they provide a focus for jobs and services in the southern part of the district.
- 2.12 Cam is a Tier 1 settlement and has a Settlement Development Limit (SDL). The preferred direction for housing growth in the emerging Local Plan Review is land to the north/north east and east of the settlement. Land west of Draycott (PS24) is proposed in the emerging Local Plan and this application relates to the northern part of the site.

3. PLANNING HISTORY OF THE APPLICATION SITE

3.1 There is no planning history of the site.

4. APPLICATION PROPOSALS AND PRE-APPLICATION DISCUSSIONS

4.1 This application seeks outline planning permission for a development comprising up to 235 dwellings.

4.2 The following provides a description of development:

Application for outline planning permission for residential development (up to 235 dwellings), vehicular, pedestrian and cycle links, strategic landscaping and green infrastructure including areas of informal and public open space and other associated site infrastructure and community uses. Associated works including demolition of existing buildings and structures. Vehicular access from the A4135.

4.3 All matters of detail relating to appearance, access, landscaping, layout and scale are reserved for subsequent approval.

4.4 The site will be accessed from the A4135. New cycle and pedestrian links will connect the development to the surrounding network of routes.

4.5 Whilst the application is submitted in outline a Framework Plan is provided to demonstrate how the site can deliver the scale of development proposed and how it links with the remainder of the site the subject of the Persimmon application. The Framework Plan shows how the development might be laid out to respond to constraints and opportunities on the site, including those identified in the technical reports submitted as part of the planning application and the supporting Environment Statement.

4.6 The application will bring forward for development additional housing land in a form which is appropriate to development in the vicinity. The proposed residential development assists in meeting housing needs as it will provide a variety of house types and sizes.

4.7 A proportion of the proposed dwellings will be provided as affordable units, with the remaining units provided as open market dwellings. The Affordable Housing Statement is included at Section 6.

4.8 The site is able to contribute to the Council's five-year housing land supply (including the provision of affordable housing) in a timely manner.

4.9 A more detailed description of development and the justification for the design concept that has been followed is set out in the Design and Access Statement accompanying this application.

Community Consultation

4.10 Pre-application public consultation took place during January and February 2021. A consultation leaflet was delivered to the surrounding area. In addition, a consultation website was set up to provide an opportunity to obtain further information on the proposal as well as submit comments online. <https://sites.google.com/view/northwestcam>

4.11 Consultation has taken place at an early stage with both Cam Parish Council and Stroud District Council, the details are outlined in the Statement of Community Involvement.

4.12 Further details of the public consultation and the comments made that have informed the proposals are contained in the Statement of Community Involvement that accompanies the application.

4.13 The comments received provided local knowledge and opinion and where possible these have been taken into consideration in the final form of development proposed in the submitted outline application, and specific assessments, including the Design and Access Statement and the Transport Statement have addressed the identified issues raised during the consultation.

5. RELEVANT PLANNING POLICY

5.1 This section refers to the relevant national planning policy and Development Plan policies that provide the planning policy framework with which this planning application should normally be considered.

5.2 It deals with the following tiers of policy and guidance:

- National Planning Policy Framework (2019)
- Local Planning Policy
- The Development Plan
- Emerging Development Plan Documents
- Emerging Neighbourhood Plan

National Planning Policy

5.3 The **National Planning Policy Framework (NPPF)** was published and came into immediate effect on 19th February 2019 and sets out a *"presumption in favour of sustainable development that is the basis for every plan and decision"*.

5.4 Annex 1 states that The Housing Delivery Test will apply from the day following the publication of the Housing Delivery Test results in November 2018. The most recent Housing Delivery Test results were published on 19th January 2021. The Housing Delivery Test period covers the previous three financial years; in the case of the 2020 measurement, the years are 2017/18, 2018/19 and 2019/20.

5.5 Paragraph 8 of the NPPF identifies three objectives to sustainable development which are economic, social and environmental. Paragraph 8 continues to state that these objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across different objectives). Therefore, to achieve sustainable development, the NPPF recognises that economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

5.6 Paragraph 10 sets out that at the heart of the NPPF is a presumption in favour of sustainable development.

5.7 Paragraph 11 sets out how policy in the NPPF pursues sustainable development through both plan-making and decision taking. For decision-taking this means (unless material considerations indicate otherwise):

"c) approving development proposals that accord with an up to date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date^A, granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed^B; or

ii) 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."

5.8 Paragraph 13 states that:

"Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

5.9 Section 3 of the NPPF "Plan Making" Paragraph 19 clarifies that;

"The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time."

5.10 Paragraph 23 states that:

"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)."

5.11 Section 4 of the NPPF "Decision Making" paragraph 38 states:

^A Footnote 7. This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1

^B Footnote 6. The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.

“Decision-makers at every level should seek to approve applications for sustainable development where possible.”

5.12 Paragraph 18 states that:

“Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.”

5.13 Paragraph 19 continues by clarifying that:

“The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time.”

5.14 Paragraph 29 emphasises the role of Neighbourhood Plans:

“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.”

5.15 Section 4 of the NPPF sets out the approach to Decision Making. Paragraph 38 states that:

“Decision-makers at every level should seek to approve applications for sustainable development where possible.”

5.16 Section 5 of the NPPF ‘Delivering a sufficient supply of homes’, sets out the need to significantly boost the supply of housing.

5.17 Paragraph 59 states:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

5.18 Paragraph 61 states that:

“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies ...”

5.19 Paragraph 62 states that:

“Where a need for affordable housing is identified, planning policies should specify the type of affordable

housing required^c, and expect it to be met on-site unless:

- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
- b) the agreed approach contributes to the objective of creating mixed and balanced communities.”

5.20 In order to support the Government’s objective, paragraph 73 states that:

“...Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”

5.21 Paragraph 74 goes on to state:

“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:

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

5.22 Section 9 (Promoting Sustainable Transport) recognises that transport policies have an important role to play in facilitating sustainable development. Paragraph 103 states that:

“Significant development should be focused on locations which are or can be made sustainable, through limiting

^c Footnote 27. Applying the definition in Annex 2 to this Framework.

the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.”

- 5.23 Paragraph 103 advises that whilst the transport system needs to be balanced in favour of sustainable transport modes the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
- 5.24 Paragraph 108 identifies that the opportunities for sustainable transport, safe and suitable access and improvements to the transport network should be considered where development could generate a significant amount of traffic. Paragraph 109 identifies that development should only be prevented or refused on transport grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts of development on the road network would be “severe”.
- 5.25 The Transport Assessment, which accompanies this application explains that the additional demand arising from the proposed development can be safely and satisfactorily accommodated on the local transport network in accordance with paragraph 111 of the NPPF.
- 5.26 A network of low-speed and distinctive streets will promote walking and cycling and together with safe and convenient pedestrian connections will link the new neighbourhood with Draycott and Cam.
- 5.27 Section 12 “Achieving Well Designed Places” states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 127 states that:

“Planning policies and decisions should ensure that developments:

a) 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;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) 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);

d) 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;

e) 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

f) 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.”

5.28 Full details of the design and design rationale for the proposal are provided in the Design and Access Statement which accompanies this application.

5.29 Section 14, *“Meeting the challenge of climate change, flooding and coastal change”* outlines at paragraph 155-165 the approach to planning and flood risk.

5.30 The site is situated within Flood Zone 1 on land at the lowest risk of flooding. Further details are provided in the Flood Risk Assessment for the Proposed Development based on the requirements of The Technical Guidance which accompanies the National Planning Policy Framework, which is submitted with the application. In accordance with the Council’s Scoping Opinion a Climate Section has also been prepared to accompany the application.

5.31 Section 15 “Conserving and Enhancing the Natural Environment” at paragraph 170 states that planning policies and decisions should contribute to and enhance the natural environment by:

“a) 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);

b) 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;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) 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

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

5.32 A suite of ecological and protected species surveys have been carried out, confirming areas to be protected wherever possible, or mitigation carried out to offset their losses (e.g. new native hedgerow planting). The development proposals offer the opportunity to enhance the biodiversity of the site post development to secure a net gain in biodiversity. The layout will retain existing site features to create a naturalistic environment which enhances biodiversity and extends green open space corridors through the site for a connected development

5.33 The proposal is not located within the AONB. The accompanying Landscape and Visual Assessment addresses guidance in the NPPF and the development plan.

5.34 The LVIA concludes that the landscape and visual effects that would arise from the Proposed Development have been assessed and whilst there would be some loss of openness, development of the site would be an extension of its surrounding context. Development can protect the features which contribute to its landscape value and visual amenity, with new tree belt planting affording opportunities to limit views towards the site and break up the mass of built form. New public open space can also provide new amenity space to augment existing nearby recreation space.

5.35 Section 16, "Conserving and enhancing the historic environment" requires at paragraph 189 applicants to;

"... describe the significance of any heritage assets affected, including any contribution made by their setting..... Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

5.36 Paragraph 196 states 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."

5.37 Matters relating to heritage assets and the historic environment are also considered in the Environmental Statement that accompanies the planning application.

5.38 Overall, the Proposed Development is consistent with the objectives of the NPPF and provides for sustainable development contributing to the three objectives of sustainable development. The site is part of the emerging allocation in the Stroud District Local Plan (PS24 West of Draycott).

5.39 However, it should be noted that there is a presumption in favour of sustainable development and furthermore, arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances set out in paragraph 49 of the NPPF 2019, where both:

"a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and

b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area."

5.40 It is considered that the development of up to 235 dwellings is consistent with the emerging Local Plan and will bring forward development to meet Stroud's housing needs in a sustainable location as already identified by the emerging Local Plan.

5.41 Annex 1 of the NPPF deals with implementation of the NPPF (paragraph 212) stating that the policies in the Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Paragraph 213 states that existing policies should not be considered out of date because they were adopted or made prior to the publication of the NPPF. Due weight should be given to policies in existing plans according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

5.42 Paragraph 215 states that the Housing Delivery Test will apply from the day following the publication of the Housing Delivery Test results in November 2018. The most recent results were published on 19th January 2021.

National Planning Practice Guidance

5.43 The NPPG was launched on the 6th March 2014 by the Department for Communities and Local Government (DCLG) having been in draft 'Beta' format since 28th August 2013. It followed a review of planning policy guidance undertaken by Lord Taylor of Goss Moor which began in October 2012 and replaced a raft of old guidance.

5.44 The guidance sits alongside the NPPF as part of the reforms to the planning system, by Government, to make it simpler and easier to shape and influence planning and development across the country. The web-based format allows the ability for MHCLG to periodically update the Guidance electronically, and for the avoidance of doubt, where this Statement relies upon the advice, reference is drawn to the date the relevant guidance was published.

5.45 Following the publication of the new NPPF in February 2019 several sections of the PPG have been revised, the most relevant are listed below. The new sections of the PPG published since February include Housing and Economic Needs Assessment (December 2020), Housing and Economic Land Availability Assessment (July 2019), Housing Needs of Different Groups (July 2019), Housing Supply and Delivery (including the Housing Delivery Test) (July 2019), Plan Making (July 2020), Determining a Planning application (March 2019), Planning Obligations (September 2019), Environmental Impact Assessment (May 2020), Strategic Environmental Assessment and Sustainability Appraisal (December 2020), use of planning conditions (July 2019), viability in plan making (September 2019).

5.46 The relevant sections of guidance in the NPPG to the application are set out in turn below.

Design: process and tools

5.47 **Paragraph 001** states that:

"Well-designed places 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 planning applications"

and the post approval stage. This guidance explains the processes and tools that can be used through the planning system and how to engage local communities effectively.”

5.48 A National Design Guide has been produced (October 2019) and sets out the characteristics of well-designed places and demonstrates what good design means in practice.

5.49 Good design is set out in the National Design Guide under the following 10 characteristics:

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

5.50 Design and Access Statements set out the narrative for the approach to design and the rationale for the scheme. They demonstrate how the 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 account of baseline information.

Planning Obligations

5.51 **Paragraph 002^D** explains how planning obligations are used to mitigate the impact of unacceptable development to make it acceptable in planning terms. Obligations should meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as

^D Planning Practice Guidance, Paragraph: 002 Reference ID: 23b-002-20190901 Revision Date 01.09.19

statutory tests in Regulation 122 (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework. These tests apply whether or not there is a levy charging schedule for the area.

- 5.52 **Paragraph 004^E** states that plans should set out policies for the contributions expected from development to enable fair and open testing of the policy at examination. **Paragraph 005** states that plans should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards including the cost implications of Community Infrastructure Levy (CIL) and planning obligations. **Paragraph 011** states that where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan, and the applicant should provide evidence of what has changed since then.

Viability

- 5.53 The PPG on Viability was updated on 1st September 2019.
- 5.54 **Paragraph 002** states that the role of viability assessment is primarily at the plan making stage.
- 5.55 **Paragraph 006** indicates *“Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.”*
- 5.56 **Paragraph 008** states that: *“Where a viability assessment is submitted to accompany a planning application this should be based upon and refer back to the viability assessment that informed the plan; and the applicant should provide evidence of what has changed since then.”*
- 5.57 The most recent changes on 1st September provide guidance on reporting and monitoring on developer contributions, and also monitoring planning obligations.

^E Planning Practice Guidance, Paragraph: 004 Reference ID: ID: 23b-004-20190315

The Development Plan

- 5.58 Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the relevant policies of the adopted Development Plan, unless material considerations indicate otherwise. Paragraph 47 of NPPF 2019 requires *“decisions on planning applications should be made as quickly as possible, and within statutory timescales unless a longer period had been agreed by the applicant in writing.”*
- 5.59 The Development Plan consists of the adopted Stroud District Local Plan (November 2015).
- 5.60 The emerging Stroud Local Plan Review has reached the Pre-Submission (May 2021) stage.
- 5.61 Paragraph 11 of the NPPF states that:
- “For decision-taking this means:**
- c) approving development proposals that accord with an up-to-date development plan without delay; or**
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:**
- i. 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**
- ii. 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.”**
- 5.62 The quantum and strategy for development in the adopted Stroud Local Plan 2015 is being reviewed. As referred to above at the time of writing the review of the Local Plan has reached the Pre-Submission stage.
- 5.63 The adopted Local Plan affordable housing policy (Policy CP9), states that at least 30% of the net units proposed will be affordable. The emerging policy in the Local Plan review continues this approach. This planning application is submitted on the basis of a policy compliant level of affordable housing. The matter is discussed further in Section 6, of the Affordable Housing Statement.

Local Planning Policy

Stroud Local Plan (adopted November 2015)

- 5.64 The adopted Stroud Local Plan provides a strategy for the district for the plan period 2006 -2031.
- 5.65 The Plan sets out the long-term vision and objectives for the area together with strategic policies for shaping new development and locations for new development up to 2031. Together these policies help to provide a strategic planning framework for the district, which guides future planning and decisions and helps to achieve the overall vision for the area.
- 5.66 To support the vision there are 6 principal objectives; these are set out on page 18 of the Plan.
- 5.67 **Core Policy CP1 Presumption in favour of sustainable development** – the policy states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development.

“... It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- 1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- 2. Specific policies in that Framework indicate that development should be restricted .”**

- 5.68 **Core Policy CP2 Strategic growth and development locations** – the policy makes provision for at least 11,400 dwellings and 950 additional care home bedspaces ...for the period 2006 – 2031 to be delivered at the strategic development sites identified in Core Policy CP2. Outside of the strategic sites,

development will take place in accordance with the settlement hierarchy set out in the Plan.

- 5.69 The Stroud Local Plan is now more than five years old and predates the NPPF 2019, having been formally adopted in November 2015, it therefore requires review. The Review of the Local Plan commenced in autumn of 2017. The National Planning Practice Guidance (PPG) states;

"Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Most plans are likely to require updating in whole or in part at least every 5 years..."

- 5.70 NPPG 'Plan Making' Paragraph: 062 Reference ID: 61-062-20190315 Revision date: 15 03 2019

- 5.71 The PPG continues;

"Policies age at different rates according to local circumstances and a plan does not become out-of-date automatically after 5 years. The review process is a method to ensure that a plan and the policies within remains effective. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Due weight should be given to relevant policies in existing plans according to their consistency with the National Planning Policy Framework. It will be up to the decision-maker to decide the weight to give to the policies."

- 5.72 NPPG 'Plan Making' Paragraph: 064 Reference ID: 61-064-20190315 Revision date: 15 03 2019

- 5.73 As it is now more than five years since the Local Plan was adopted, the five year housing land supply is calculated against the District's local housing need which is assessed using the standard method. The latest District Housing Land Supply Assessment Update November 2020, states that there is a supply of 6.56 years.

- 5.74 **Core Policy CP3 Settlement Hierarchy** – sets out the district settlement hierarchy, settlements are classified in one of five tiers, reflecting their size and range of services and facilities and their capacity for growth and to promote sustainable communities.

5.75 Cam is a First Tier settlement, along with Stroud, Stonehouse and Dursley, these are the districts main settlements and the primary focus for growth and development to support their strategic roles as employment and service centres. They will continue to provide significant levels of jobs and homes, together with supporting community facilities and infrastructure to meet their economic potential in the most sustainable way.

5.76 **Core Policy CP4 Place Making** - All development proposals shall accord with the Mini-Visions and have regard to the Guiding Principles for that locality. Proposals are expected to integrate into the neighbourhood, place shape and protect or enhance a sense of place and create safe streets, homes and workplaces.

“All development proposals shall accord with the Mini-Visions and have regard to the Guiding Principles for that locality, as set out in this Plan and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents. Proposals 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).”

5.77 **Core Policy CP5 Environmental development principles for strategic sites** - This policy seeks to ensure that development at the strategic sites identified in Core Policy CP2 will meet the highest standards of energy efficiency;

incorporate on-site renewable and low-carbon energy technologies; reduce the volume of waste going to landfill; and mitigate against climate change.

“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 all strategic sites (both residential and non-residential) will be required to provide a statement demonstrating how sustainable construction principles have been incorporated. This should address demolition, construction and long term management. This will be expected to show how the proposal maximises its contribution towards the following objectives:

- A. Sustainable sourcing of materials and their efficient and appropriate use, including their durability.**
- B. Minimising waste and maximising recycling**
- C. Incorporating Sustainable Drainage Systems**
- D. Minimising water consumption**
- E. Minimising energy consumption and improving energy performance**
- F. Minimising net greenhouse gas emissions of the proposed development**
- G. Maximising low or zero carbon energy generation.**

Where the Council considers it could be likely that the proposal will result in significant adverse environmental effects during the construction phase, a Construction Environmental Management Plan (CEMP) will be required.”

- 5.78 **Core Policy 6 Infrastructure and developer contributions** - confirms that the Council will work to ensure that infrastructure will be in place at the right

time to meet the needs of the District and support the development strategy. CP6 establishes a framework for the delivery of green infrastructure and open space in association with new development. The policy provides the approach to developers contributions and allows for financial contributions to be sought through S106 and CIL mechanisms as appropriate to ensure the delivery of new infrastructure. The CIL Charging Schedule was approved in February 2017.

5.79 **Supplementary Planning Document on Planning Obligations (April 2017)**

supplements Policy CP6 and seeks to ensure infrastructure is in place at the right time to meet the needs of the District and to support the development strategy. This SPD also provides detail on how other policies related to infrastructure provision in the Local Plan will be implemented.

5.80 The Council has implemented a Community Infrastructure Levy (CIL) for Stroud District, in order to secure contributions from development to support growth. Consequently, the SPD deals only with affordable housing provision and site-specific obligations necessary to make development acceptable in land use terms.

5.81 **Core Policy CP7 Lifetime Communities** - requires proposals to demonstrate how consideration has been given to an ageing population; children and families; people with special needs; and specific needs of minority groups. Proposals need to demonstrate consideration to lifetime accommodation and contribution to meeting needs of those who have existing standing family, education or employment connections to the area.

5.82 **Core Policy CP8 New Housing Development** - seeks to ensure that new developments are well designed to address local need, provide a range of types, tenures and sizes of dwellings. Proposals will need to be an appropriate density; have a layout that supports accessibility by bus, bike and foot; appropriate layout, parking, landscaping and community facilities; use sustainable construction techniques and enable provision of infrastructure.

5.83 Furthermore, Policy CP8 requires major residential developments to enhance biodiversity on site.

5.84 **Core Policy CP9 Affordable Housing** - requires a provision of 446 affordable dwellings per annum. Developments exceeding 4 or more dwellings will provide at least 30% affordable housing provision. The Council will negotiate the tenure,

size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors.

5.85 A policy compliant level of affordable housing will be provided in accordance with Policy CP9 and an affordable housing statement is provided at Section 6.

5.86 **Core Policy CP13 Demand Management and Sustainable Travel Measures** - confirms that major schemes will be supported where they provide for a variety of forms of transport to cars; improve the existing infrastructure network; and, mitigate any significant adverse effects upon the transport network that arise from the development proposed.

5.87 Development shall also be located/provide choices to minimise the distance people need to travel; provide appropriate parking in accordance with the Council's adopted standard; not be detrimental to road safety; and not cause or contribute to highway problems of traffic related environmental problems.

5.88 **Delivery Policy EI12 Promoting Transport Choice and Accessibility** requires:

"Where appropriate, new developments will be required to connect into the surrounding infrastructure and contribute towards new or improved walking, cycling and rail facilities within the District and the provision of an integrated public transport network across the District".

5.89 Furthermore, Policy EI12 confirms:

"All development proposals should have full regard to the traffic impact on the local highway network. Major development proposals, or those that are likely to have a significant impact on the local transport network, will be required to submit a Transport Assessment as well as a Travel Plan, to demonstrate that they have fully considered access by all modes of transport."

5.90 **Delivery Policy EI13 Protecting and extending our cycle routes** – the Council will encourage proposals that develop and extend the cycle network. Major development should provide new cycle routes within the development and connect to nearby established cycle routes.

"Development will not be permitted where it significantly harms an existing cycle route or prejudices the future implementation of the following routes:

1. The Eastington to Chalford cycle route

2. The Eastington to Nailsworth cycle route

3. The Cam and Dursley cycle route (and any proposed future extension to Uley)

4. The National Cycle Network Route 41 (Bristol to Stratford) and Route 45 (Salisbury to Chester) which cross the District and connecting routes to and from the Stroud Valleys Pedestrian Cycle Trail and the Cam and Dursley cycle route

5. Any other part of the cycle network highlighted through the Local Transport Plan.”

5.91 **Delivery Policy EI16 Provision of Public Transport Facilities** recognises that proposals should cater for the needs of bus and taxi operators.

5.92 Recognition of the need to provide sufficient infrastructure to enable and support sustainable development and economic growth is inherent in the NPPF.

5.93 A Transport Assessment and Travel Plan are contained in the accompanying Environmental Statement.

5.94 **Core Policy CP14 High Quality Sustainable Development** requires development to achieve the following:

“High quality development, which protects, conserves and enhances the built and natural environment, will be supported. Development 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. Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including trees, hedgerows and other natural features)

9. Contribute 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 enhancement, open space and amenity space.

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.

Major development should contribute to the provision for allotments and/or community gardens where there is an identified need.

Development proposals will be required to demonstrate how they have responded to the above criteria through the submission of Design and Access Statements and relevant technical reports. It is important that the applicant provides clear and informative plans, elevations and street scenes and, where required, Masterplans, Development Briefs, Concept Statements and Design Codes to show how these criteria have been taken into account where necessary."

5.95 **Delivery Policy ES1 Sustainable Construction and Design** requires all applications to include evidence of maximising energy efficiency, minimisation of waste and maximising recycling of waste, conserving water, efficiency in material use, flexibility and adaptability, consideration of climate change

adaptation, and submission of a Stroud District Sustainable Construction Checklist as part of all applications.

- 5.96 **Delivery Policy ES3 Maintaining Quality of Life within our Environmental Limits** - seeks to ensure that planning applications do not result in an unacceptable level of noise, general disturbance, smell, fumes, loss of daylight/sunlight, loss of privacy, an overbearing effect, environmental pollution, exposure to noise, increased risk of flooding, detriment to highway safety, or an adverse effect on contaminated land.
- 5.97 The NPPF seeks to ensure that flood risk is taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of high risk.
- 5.98 **Delivery Policy ES4 Water Resources, Quality and Flood Risk** - requires applications to include Flood Risk Assessments where appropriate and incorporate sustainable drainage measures (SuDS).
- 5.99 The accompanying Environmental Statement includes a chapter on Climate Change and includes a Flood Risk Assessment which has been prepared for the site which includes details of proposed sustainable drainage features at the site.
- 5.100 **Delivery Policy ES5 Air Quality** - relates to developments which may exacerbate local air quality.
- 5.101 **Delivery Policy ES6 Providing for Biodiversity and Geodiversity** - confirms that European Sites, National Sites, Local Sites will be safeguarded. All new development will be required to conserve and enhance the natural environment.
- 5.102 Proposals which affect European Protected Species will not be supported unless appropriate safeguarding measures can be provided.
- 5.103 The accompanying Environmental Statement considers matters relating to biodiversity at the site.
- 5.104 **Delivery Policy ES7 Landscape Character** - recognises that in all locations, development should conserve or enhance the special features and diversity of different landscape characters. Opportunities for appropriate landscaping will be sought for all new development.

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

5.106 **Delivery Policy ES8 Trees, Hedgerows and Woodlands** - stipulates:

“Development should seek where appropriate to enhance and expand the District’s tree and woodland resource.

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 the loss of trees is considered acceptable, adequate replacement provision will be required that utilise species that are in sympathy with the character of the existing tree species in the locality and the site.”

5.107 **Delivery Policy ES10 Valuing our Historic Environment and Assets** - recognises the need to preserve, protect and enhance the historic environment.

5.108 **Delivery Policy ES12 Better Design of Place** - relates to creating well designed places.

5.109 **Delivery Policy ES14 Provision of Semi-Natural and Natural Green Space with New Residential Development** - confirms:

“Strategic and major residential development 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.”**

5.110 **Delivery Policy ES15 Provision of Outdoor Play Space** - outlines:

“Proposals for new residential development shall provide appropriate public outdoor playing space, to achieve a

standard of 2.4ha per 1000 population. The standard 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. Public Open Space should be usable and easily accessible to the dwellings it is intended to serve by a good quality pedestrian and cycle route..."**

5.111 **Delivery Policy ES16 Public Art Contributions** - requires proportionate contributions for major residential schemes.

Stroud Local Plan Review

5.112 The Stroud Local Plan 2006 – 2031 is under review. The review will replace the existing Local Plan in its entirety.

5.113 Consultation on the Issues and Options commenced in Autumn 2017, this was followed by a consultation on the Emerging Strategy in Winter 2018. A Draft Plan (Regulation 18) consultation took place in Autumn 2019. Land west of Draycott is a proposed allocation in the Draft Plan.

5.114 In August 2020, the Government published a consultation document which proposed changes to the way the Government calculates the minimum housing requirement for each local authority area in the country. As the revised standard method at that time proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum, the Council undertook a further consultation on Additional Housing Options in the Autumn of 2020.

5.115 In December 2020 the Government published amendments to the standard method and for the vast majority of authorities reverted back to the method it introduced in 2018, the only modification was to increase the figure in the 20 largest cities and urban areas by 35%, this did not affect Stroud District.

5.116 At the time of writing the Pre-Submission Stroud Plan (Regulation 19) has been considered by the Council at the Environment Committee and Full Council in April

2021. Consultation on the Regulation 19 Plan commenced on 26th May before being the Plan is submitted to the Secretary of State for Examination.

5.117 The Stroud Plan will replace the Local Plan of 2015, and once adopted, will together with the Gloucestershire Minerals and Waste Local Plans and, any neighbourhood plans made in the future, comprise the statutory development plan for Stroud District up to 2040.

Emerging Local Plan Policies

5.118 The following paragraphs below refer to the policies included in the Pre-Submission Draft Local Plan (May 2021).

5.119 The Plan identifies 40 key issues, challenges and needs facing the district, which the Local Plan should seek to address, many of these reflect the key issues identified in the 2015 Local Plan. However, the Plan now identifies the implications of climate change as an overarching priority for the District.

5.120 A number of key issues have been identified as priorities for the Local Plan to tackle:

- **Moving the district towards becoming Carbon Neutral by 2030 whilst adapting to the impacts of climate change and providing resilience for the future.**
- **Ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development,**
- **Conserving and enhancing Stroud District's countryside and biodiversity, including maximising the potential for a green infrastructure network across the District,**
- **Maximising the potential of brownfield and underused sites to contribute to housing supply,**
- **Developing strategies to enhance the natural environment and to avoid and mitigate the indirect impacts of development on the natural environment,**
- **Tackling the acute lack of affordable housing in the District.**

5.121 Each of these priorities is expanded upon in the Plan. Taking account of the identified issues and priorities, the Local Plan lists six principal objectives. Each of these objectives forms a basis for the policies that follow.

- 5.122 **Core Policy DCP1 Delivering Carbon Neutral by 2030** is a new policy to support the Council's target of becoming Carbon Neutral by 2030.
- 5.123 The Local Plan review has a plan period of 2020-2040 and using the Standard Method the housing to be provided is at least 630 dwellings per year. Over the plan period the figure is at least 12,600 new homes, this is set out in **Core Policy CP2 Strategic growth and development locations**.
- 5.124 The emerging Plan continues the strategy of concentrating housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure. Cam continues to be identified as a Tier 1 settlement in the district, this is set out in **Core Policy CP3 Settlement Hierarchy**.
- 5.125 The strategy for Cam is set out in paragraph 2.3.14 of the Pre-Submission Plan:
- "At Cam, the strategy envisages: regenerating brownfield sites within the settlement; the consolidation of growth to the north east of the town, linking the parish centre with improved facilities at Cam and Dursley railway station and completing the linear park and local cycling and walking network; new housing development, community and open space uses to the north west, improving access to Jubilee Playing Field and creating a landscaped buffer between the existing edge of Cam and the M5 motorway."**
- 5.126 The Plan identifies "Cam North West" as a sustainable urban extension to Cam, which will deliver a high quality housing development, including residential and community uses that meet the day to day needs of residents. The proposed allocation "land Cam North West" is located to the west of Draycott and the north east of Everside Lane and Jubilee Fields.
- 5.127 Land west of Draycott (Cam North West) is proposed to accommodate approximately 900 dwellings and a 2 FE primary school, a community building (or access improvements and contributions to Jubilee Fields) and recreation open space and natural green space in accordance with Local Plan standards to meet the needs of residents.
- 5.128 The proposed strategic site allocation policy **is Policy PS24 Cam North West:**
- "Land west of Draycott, as identified on the policies map, is allocated for a strategic housing development, including residential and community uses."**

A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.

This will address the following:

- 1. Approximately 900 dwellings, including 30% affordable dwellings, to address tenure, type and size of dwellings needed within the Cam and Dursley cluster area;**
- 2. A 2 form entry primary school (incorporating early years' provision) on a 2 hectare site and contributions towards secondary school and further education provision;**
- 3. A contribution towards the extension of existing health facilities at Cam to support the development;**
- 4. Accessible natural green space providing a net gain to local biodiversity and public outdoor playing space, including on-site community building or access improvements and contributions to Jubilee Fields and contributions to off-site indoor sports and leisure facilities, in accordance with local standards;**
- 5. Structural landscaping buffer along the northern and western boundaries incorporating existing and new native hedgerows and trees and linking with existing green infrastructure;**
- 6. On site and, if appropriate, off site work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar site;**
- 7. The acceptable management and disposal of surface water, including sustainable drainage systems (SuDS);**
- 8. Adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company;**
- 9. A layout, density and built form and character which conforms to the Cam Neighbourhood Plan Design Code;**
- 10. A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycle routes that are shorter in distance than the highway network, in accordance with Manual for Streets;**
- 11. High quality and accessible walking and cycling routes within the site including the retention and diversion of existing footpaths as necessary, the provision of a pedestrian and cycle crossing on the A4135 for safer access to/ from Cam and Dursley station and Cam local centre and contributions towards the enhancement of off-site walking and cycling routes to key destinations including to Cam local centre, Draycott**

Business Park and Draycott Mills, local schools, the A38 and the Cam and Dursley Greenway;

12. Contributions and support to sustainable transport measures on the A38 and A4135 sustainable transport corridors;

13. A bus loop through the site and bus stops and shelters at appropriate locations within the development to access existing diverted and new bus services and contributions to enhance bus service frequencies to key destinations including Dursley, Gloucester, Stroud, and Stonehouse;

14. Electric vehicle charging points in accordance with local parking standards;

15. Behavioural change measures to encourage sustainable travel by way of new and improved infrastructure and implementation of a Travel Plan.

16. Primary vehicular access from the A4135, with necessary improvements to the existing highway network;

17. Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location;

18. Phasing arrangements to ensure that community provision is made in a timely manner.”

- 5.129 This application is for part of PS24 as described in Section 2 of this Planning Statement. The application is accompanied by an Environmental Statement and a Design and Access Statement which address all the points relevant to the outline application.
- 5.130 **Core Policy CP4 Place Making** - All development proposals shall accord with the Mini-Visions and have regard to the Guiding Principles for that locality. Proposals are expected to integrate into the neighbourhood, place shape and protect or enhance a sense of place and create safe streets, homes and workplaces. No changes are proposed to this policy, although the supporting text refers to **The National Design Guide** (MHCLG, 2019) and principles, guidance and design tools published by the **Design Council** (and its predecessor, **CABE**).
- 5.131 **Core Policy CP5 Environmental Development Principles for Strategic Sites** - This policy seeks to ensure that development at the strategic sites identified in Core Policy CP2 will meet the highest standards of energy efficiency; incorporate on-site renewable and low-carbon energy technologies; reduce the volume of waste going to landfill; and mitigate against climate change. There is

one additional objective that is proposed in this policy "*H Minimising impacts on the natural environment and maximising green infrastructure.*"

- 5.132 **Core Policy CP6 Infrastructure and developer contributions** - confirms that the Council will work to ensure that infrastructure will be in place at the right time to meet the needs of the District and support the development strategy. No significant changes are proposed to Policy CP6.
- 5.133 **Core Policy CP7 Inclusive Communities** - The policy wording that is proposed is different from the adopted Policy. The proposed wording states, development proposals should contribute towards meeting the needs of all sections of the community and help to encourage social cohesion. Policy CP7 is proposed to apply to all major housing developments of 10 dwellings or more (or an outline application for residential development on a site of 0.5 hectares or larger) and the development of community facilities, including development for health (such as preventative social care and community support services), education, play and leisure or culture together with libraries, village/community halls, religious buildings and burial sites.
- 5.134 **Core Policy CP8 New housing development** - that new housing meets the needs of different groups in the community as identified in the Local Housing Need Assessment in terms of different types, tenures and sizes. Additional wording is proposed to the policy in respect of development on major sites, that the range and types, tenures and sizes should reflect the housing needs identified for that Parish Cluster area.
- 5.135 **Core Policy CP9 Affordable Housing** - requires a provision of 424 affordable dwellings per annum. The policy proposes that developments exceeding 4 or more dwellings will provide at least 30% affordable housing provision. The Council will negotiate the tenure, size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors. This policy remains unchanged from the adopted Plan.
- 5.136 **Core Policy CP13 - Demand management and sustainable travel** - confirms that major schemes will be supported where they provide for a variety of forms of transport as alternatives to the car to allow more sustainable choices; improve the existing infrastructure network; and, mitigate any significant adverse effects upon the transport network that arise from the development proposed.

- 5.137 The policy proposes that in all cases development shall also 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; provide appropriate parking in accordance with the Council's adopted standard; not be detrimental to road safety; and not cause or contribute to highway problems of traffic related environmental problems.
- 5.138 The proposed policy includes new wording "*Development proposals will be expected to consider all possible sustainable transport options before the capacity of the road network is increased.*" Reference is also made to the Stroud Sustainability Transport Strategy.
- 5.139 **Delivery Policy EI12 Promoting Transport Choice and Accessibility** proposes that all developments should be planned in line with the Sustainable Transport Hierarchy and that:
- "In the first instance, opportunities to reduce the need to travel should be maximised, including through the provision of ancillary facilities on-site and through measures which enable people to work from home, such as high speed broadband. Development should be located in areas which are already well served by public transport and have access to a range of local facilities within walking and cycling distance. Masterplans should be designed to prioritise active travel modes, including emerging mobility options such as e-bikes and e-scooters, over private car usage. Residential streets should be designed to a 20mph speed limit to enhance pedestrian and cycle safety.**
- Bus permeability and associated facilities should be incorporated into development proposals, where appropriate, and pedestrian facilities should be provided to ensure people can access bus services, either on or off-site. Shared mobility opportunities should be explored and accommodated through design, with the aim of reducing car ownership whilst maintaining personal mobility."**
- 5.140 The policy proposes that walking, cycling and public transport facilities will be required to be put in place as early as possible in development proposals to ensure the opportunities for sustainable travel are available to support early occupation.
- 5.141 **Delivery Policy EI13 Protecting and extending our walking and cycling routes** – the policy is proposed to address walking as well as cycling.

“...proposals that develop and extend our walking and cycling network. Major development should provide new walking and cycling routes within the development and connect to nearby established and proposed walking and cycling routes.

Development adjacent to walking and cycling routes will be required to provide convenient access points for both walkers and cyclists. Development should provide cycle parking where appropriate and in accordance with the adopted standards as set out in Appendix C of this Local Plan.”

- 5.142 **Delivery Policy EI16 Provision of Public Transport Facilities** recognises that proposals should cater for the needs of bus and taxi operators. There are no changes proposed to this policy.
- 5.143 **Core Policy CP14 High Quality Sustainable Development** – there are some minor changes proposed to this policy, but in essence the emphasis is on high quality sustainable development and addressing climate change.
- 5.144 **Delivery Policy ES1 Sustainable Construction and Design** – there are a number of changes proposed to the policy, reflecting addressing climate change, in particular how all new developments should achieve net zero carbon standard.
- 5.145 **Delivery Policy ES3 Maintaining Quality of Life within our Environmental Limits** seeks to ensure that planning applications do not result in an unacceptable level of noise, general disturbance, smell, fumes, loss of daylight/sunlight, loss of privacy, an overbearing effect, environmental pollution, exposure to noise, increased risk of flooding, detriment to highway safety, or an adverse effect on contaminated land. The proposed change to the wording of the policy is 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.
- 5.146 **Delivery Policy ES4 Water Resources, Quality and Flood Risk** - requires applications to include Flood Risk Assessments where appropriate and incorporate sustainable drainage measures (SuDS). There are some proposed changes to the wording of the policy.
- 5.147 As referred to earlier the accompanying Environmental Statement includes a chapter on Climate Change and includes a Flood Risk Assessment which has been prepared for the site which includes details of proposed sustainable drainage features at the site.

- 5.148 **Delivery Policy ES5 Air Quality** - relates to developments which may exacerbate local air quality. There are no significant changes proposed to this policy.
- 5.149 **Delivery Policy ES6 Providing for Biodiversity and Geodiversity** - there are significant changes proposed to the policy reflecting the mechanisms for delivering a minimum of 10% biodiversity net gain. Development proposals shall also demonstrate that the mitigation hierarchy has been followed sequentially
- 5.150 The accompanying Environmental Statement considers matters relating to biodiversity at the site.
- 5.151 **Delivery Policy ES7 Landscape Character** - recognises that in all locations, development should conserve or enhance the special features and diversity of different landscape characters. Opportunities for appropriate landscaping will be sought for all new development.
- 5.152 **Delivery Policy ES8 Trees, Hedgerows and Woodlands** - a number of changes are proposed to the wording of the policy to reflect climate change and adaptation and that development proposals provide soft landscaping details and specifies the what should be taken into account in Landscaping Schemes.
- 5.153 **Delivery Policy ES10 Valuing our Historic Environment and Assets** - recognises the need to preserve, protect and enhance the historic environment.
- 5.154 **Delivery Policy ES12 Better Design of Places** - relates to creating well designed places.
- 5.155 **Delivery Policy DHC7 Provision of New Open Space and built and indoor facilities.** This is a proposed new policy and sets out the standards for open space in terms of quantity and access standards. The Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) identifies new quantity, quality and accessibility minimum standards of provision for the District.
- 5.156 Provision of open space is set out in the accompanying Design and Access Statement.
- 5.157 **Delivery Policy ES16 Public Art Contributions** - requires proportionate contributions for major residential schemes.

5.158 **Delivery Policy DES2 Green Infrastructure** – this is a proposed new policy. This policy is designed to reflect the changed policy landscape since the previous **Green Infrastructure County-wide Strategy** prepared in 2015. In particular, the policy includes an increased emphasis on the importance of GI in responding to concerns over health, wellbeing, habitat fragmentation and climate change resilience.

5.159 Whilst 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 they set out a direction of travel. This site is consistent not only with the strategy of the adopted Local Plan, but also the emerging Local Plan and makes provision for affordable housing in accordance with both the adopted Local Plan and the emerging Local Plan.

5.160 A draft Heads of Terms accompanies this document at Appendix 1 and sets out those areas where the developer is willing to offer S.106 contributions to meet those needs reasonably arising from the development of the site.

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5.161 The application will also be subject to CIL which covers any contributions to strategic infrastructure off site.

Neighbourhood Planning

5.162 There is no 'made' Neighbourhood Plan which covers the application site; however, the Cam Neighbourhood Development Plan is being prepared. The Parish Council received the Examiner's report (20th February 2020), and the decision notice from Stroud District Council (4th June 2020), that the Plan could proceed to referendum. However, due to the COVID pandemic all referendums were postponed in between 16th March 2020 and 5th May 2021 in line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020 until 6 May 2021. The referendum for the Cam Neighbourhood Plan was held on 6th May 2021.

5.163 The neighbourhood plan attains the same legal status as a local plan (and other documents that form part of the statutory development plan) once it has been approved at a referendum. At this point it comes into force as part of the statutory development plan.

5.164 The Neighbourhood Plan covers the same timeframe as the adopted Stroud District Local Plan, up to 2031. It contains locally distinctive policies addressing:

- Environment and Sustainability
- Local Character and Distinctiveness
- Movement and Connectivity
- Community Facilities and Services
- Employment
- Cam Village Centre.

5.165 The Neighbourhood Plan also contains the Cam Design Code (Appendix 3), it underpins the Neighbourhood Plan policies on environment, local character and distinctiveness as well as access and movement. The Code is focused on providing direction and guidance to enable development and investment proposals to protect and strengthen Cam's distinct character through an informed and joined-up approach to delivery of environment, character and movement policies.

5.166 The Neighbourhood Plan acknowledges that future development in Cam is expected to be of a strategic nature, to come forward through the current Local Plan and the review of the Local Plan.

"It is recognised that together with Dursley, Cam Parish represents a significant conurbation and an important second focus for the District, therefore strategic allocations are proposed in Cam Parish in the emerging draft new Local Plan. As such the Parish commits to an early review of the Cam Neighbourhood Plan once the new Stroud Local Plan is in place." Page 17 Cam Development Strategy

5.167 The following policies are relevant to the consideration of the land west of Draycott.

5.168 **Policy CAMES1 Green Infrastructure and Biodiversity** – development adjacent to or containing identified Green Infrastructure network assets and priorities should protect and where feasible extend the network. Development in other locations should protect green on-site infrastructure and will be encouraged to enhance the network where feasible.

5.169 The Cam Design Code (2019) also sets out the importance of existing GI assets in the Neighbourhood Plan area, and also sets out more detail about where priorities and opportunities for GI exist. Green Infrastructure in Cam is established to be a key element in delivering locally distinctive placemaking in Cam.

“The Cam Neighbourhood Plan seeks a landscape and green infrastructure led approach to future development and encourages developers to seek to achieve a Building with Nature accreditation.”

5.170 The Parish Green Infrastructure Corridor 2 M5 Green Edge runs to the North West of the site, adjacent to the M5. The framework plan for the sites responds to this policy.

5.171 **Policy CAMES2 Parish Landscape Character** - This policy draws on the Stroud District Landscape Character Assessment (2000), and the Cam Design Code (2019).

“It also draws on the Cam Parish Landscape Sensitivity Assessment (2018), which provides a detailed assessment of land parcels around the built area of Cam. The assessment sets out landscape value, sensitivity and characteristics of each land parcel together with an overview on the suitability, in landscape terms, for possible residential development.”

5.172 **Policy CAMCD1 Locally Distinctive Design** – development proposals are encouraged to be submitted with a design analysis statement.

“Policy CAMCD1 supports Stroud Local Plan policy ES12, which requires new development to be informed by relevant Design Statements and/or Design Codes. The Cam Community Design Statement (2018) and Cam Design Code (2019) provide a Parish level of detail to help new development enhance and reinforce the local distinctiveness of Cam.”

5.173 **Policy CAMCD3 Sustainably Designed Homes and Places in Cam** - encourages sustainable design and construction within the Parish.

5.174 **Policy CAMCD4 Pre-application Community Engagement** – promotes and encourages pre-application engagement. As part of the preparation of the application Robert Hitchins Ltd have met the Parish Council on several occasions and public consultation was carried out on the emerging proposals for the site in January and February 2021. The extent of engagement is set out in the accompanying Statement of Community Involvement.

- 5.175 **Policy CAMMC1 Improving and Enhancing Connections for Cyclists and Pedestrians** - promotes sustainable transport and the provision of high quality segregated routes for people walking or cycling.

“CAMMC1 promotes sustainable transport and the provision of high quality non-vehicular routes, and supports paragraph 104 of the NPPF, adding parish level detail to the protection and enhancement of sustainable transport routes required by Stroud Local Plan policies EI12, EI13 and EI16.”

- 5.176 Policy CAMCF1 Retention of Community Facilities – the policy covers the protection of existing local facilities and services, whilst encouraging ample provision of new ones as part of new development.
- 5.177 **Policy CAME1 Encouraging Startup, New Businesses and Home-Working** – the policy encourages house builders to build with home office workers in mind.
- 5.178 The emerging Cam Parish Neighbourhood Development Plan 2019-2031 recognises that together with Dursley, Cam Parish represents a significant conurbation and an important second focus for the District, therefore strategic allocations are proposed in Cam Parish in the emerging draft new Local Plan. As such the Parish commits to an early review of the Cam Neighbourhood Plan once the new Stroud Local Plan is in place.
- 5.179 The emerging policies of the Cam Neighbourhood Plan have been considered in the preparation of this application. The Design and Access Statement (DAS) includes the key design objectives for the site which are aligned closely with the emerging Cam Neighbourhood Plan; for example by ensuring that the design of new development protects and enhances the existing distinctiveness of Cam Parish by creating distinctive character areas and by protecting and enhancing Cam’s distinctive sylvan, wooded character by retaining trees/hedges as primary place-making landmarks, to provide green linkages between areas of higher ecological value and to soften the visual impact of the new development from the AONB and views from adjacent rights of way.
- 5.180 The DAS provides an assessment and a design narrative with evidence to demonstrate how the design has taken into account the Cam Parish Community Statement and Neighbourhood Plan.

6. AFFORDABLE HOUSING STATEMENT

- 6.1 Paragraph 61 of the NPPF requires local authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups within the community. Paragraph 61 also states that the size, type and tenure of housing needed for different groups in the community should be reflected in planning policies.
- 6.2 The adopted Stroud Local Plan, Policy CP9 Affordable Housing requires all residential proposals of at least 4 dwellings covering a net site area of at least 0.16 ha will provide at least 30% of the net units proposed as affordable dwellings, where viable.
- 6.3 Given that this is an outline application the application needs to be considered in the context of the adopted development plan and the most recent national planning policy guidance for the delivery of affordable dwellings.
- 6.4 The application proposes a policy compliant level of affordable housing and this matter is further considered in the Draft Heads of Terms submitted with the planning application and attached at Appendix 1.

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7. PLANNING FACTORS IN SUPPORT OF DEVELOPMENT

- 7.1 This section sets out the main planning considerations for this application.
- 7.2 Whilst the site is not allocated for residential development in the Stroud District Local Plan (November 2015), land west of Draycott (PS24) it is identified as an area for future growth in the emerging strategy recognising the suitability of this location as a sustainable development and its contribution to the growth agenda and spatial strategy of both Cam and the wider Stroud District.
- 7.3 The site (PS24) is proposed in the Pre-Submission version of Local Plan (May 2021). Land West of Draycott is a proposed allocation for approximately 900 dwellings, primary school, strategic landscaping and green infrastructure and associated community and open space uses. This site which is the subject of this planning application is part of the proposed allocation.
- 7.4 The entire site has been promoted through the preparation of the Local Plan Review. Robert Hitchins Ltd and Persimmon Homes made a joint submission in response to the consultation on the Local Plan in January 2019. Separate submissions were also made in January 2020 in response to the consultation on the Draft Local Plan and more recently in December 2020 in response to the consultation on the Additional Housing Options.
- 7.5 The site (PS24) constitutes a logical location for residential development. It adjoins the existing built form and the existing settlement boundary for Cam to the south.
- 7.6 The site is considered appropriate for residential development for the following reasons:
- 7.7 **The Stroud Local Plan (2015) identifies Cam as a Tier 1 settlement along with Stroud, Stonehouse and Dursley.** These are the main settlements in the district, i.e. the largest and most populous settlements in the district; each of which benefits from transport infrastructure that enables good access to key services and facilities, with good links to their suburbs and “satellite” communities. These settlements continue to be the primary focus for growth and development in the Local Plan Review.
- 7.8 **Draft Core Policy CP3 confirms that proposals for new development should be located in accordance with the District’s settlement hierarchy**

which will ensure that development reduces the need to travel and promotes sustainable communities, based on the services and facilities that area available at each settlement. Cam continues to be identified as a Tier 1 settlement. As such the proposed development which is part of the proposed allocation at PS24 would help to contribute to, and reinforce the role of Cam as a Tier 1 settlement. Increasing the number of dwellings at a Tier 1 settlement is consistent with the strategy. The site is suitable, available and a deliverable site for development due to its location, access to services and facilities, limited physical constraints that can be brought forward for development without harm to biodiversity of heritage assets.

- 7.9 **Emerging allocation for residential development on the north east of Cam in the Stroud Local Plan Review.** The identification of the site as an emerging mixed use development demonstrates the suitability of the location for residential development and is consistent with the preferred direction for growth for Cam.
- 7.10 This planning application and accompanying technical reports demonstrates the suitability of the entire site to accommodate more dwellings than included within the emerging allocation, recognising that there are no constraints which would restrict development on the entire site to 900 dwellings. The application which this Planning Statement supports is for part of the site for up to 235 dwellings.
- 7.11 **Local Plan Housing Requirement** from the adopted Plan confirms that over the plan period of 2006 to 2031, Stroud District will accommodate at least 11,400 additional dwellings (Core Policy 2 of the Stroud Local Plan, 2015) i.e. 456 dwellings per annum.
- 7.12 **The housing requirement figure is an “at least” figure.** This means that the figures in the Stroud Local Plan (2015) should not be regarded as a “ceiling” or “cap” on development. If development is consistent with the objectives and strategy of the NPPF and any emerging development plans, it should be considered favourably.
- 7.13 Indeed the site is part of the proposed allocation in the emerging Local Plan Review PS24 West of Draycott.
- 7.14 Five Year Housing Land Supply Position. Paragraph 73 of the NPPF confirms that Local Planning Authorities should identify and update annually a supply of deliverable sites to provide a minimum of five years’ worth of housing against

their housing requirements set out in adopted strategic policies, or against their local housing need where their strategic policies are more than five years old.

7.15 In November 2020, Stroud District Council's Local Plan became 5 years old, resulting in strategic policies containing housing requirements (such as Policy CP2 of the Stroud Local Plan (2015)), exceeding the five year requirement in Paragraph 73 of the NPPF. In such circumstances, the NPPF advises that Stroud District Council's five-year housing land supply should be assessed against local housing need.

7.16 The Council's latest Housing Land Supply Assessment Update – November 2020, the report measures the 5-year housing land supply against the District's local housing need assessed using the standard method. The report also includes new planning permissions for residential development for the six months to 30 September 2020 in line with previous annual reporting. (The report has not involved a full resurvey of sites to determine whether sites previously with permission are now under construction or whether sites previously under construction have now been completed.)

7.17 The update assessment takes into account the following changes since 1 April 2020:

- **“ New permissions or other firm commitments for housing granted between 1 April and 30 September 2020**
- **Large sites with planning permission which have lapsed between 1 April and 30 September 2020**
- **Due to the impact of the Covid-19 pandemic and a delayed full assessment of housing land availability, published in October 2020, it has not been considered reasonable to contact developers for an updated assessment of the deliverability of large sites at 01 October 2020. The report is therefore based on the information previously obtained between August and September 2020 and published as part of the Stroud District Five Year Housing Supply October 2020.”**

7.18 As such the Council has a housing land supply of approximately 6.56 years.

7.19 The location of the site is consistent with the strategy of both the adopted Local Plan and the emerging Local Plan; as Cam is a Tier 1 settlement and continues to be a focus for future growth in the district. The proposed development will not prejudice the development plan currently being prepared, the Stroud Local Plan

Review, as it will support the role and function of Cam in accordance with the strategy, making efficient use of land in accordance with Section 11 of the NPPF and in a sustainable location.

- 7.20 **Contribution to meeting affordable housing needs** the site will make a significant policy compliant contribution (subject to viability) to affordable housing.
- 7.21 The documents submitted with this outline application, and, in particular, the Design & Access Statement will ensure a commitment to a sustainable development of high quality design which will be compatible with the existing area.
- 7.22 **Transport** –A Transport Assessment prepared by Jubb forms part of the application submission to support the site and concludes and demonstrates that with the implementation of the mitigation measures, whether designed, management control or physical in nature, the additional demand will be safely and satisfactorily accommodated on the surrounding transport network.
- 7.23 The proposed development offers greater permeability through the site, promoting the use of sustainable forms of travel from north to south, east to west, through numerous green corridors (snickets), separated from the road network. Either side of the main spine road will feature a 3 meter wide active corridor with a designated cycle lane, supporting safe active modes of travel.
- 7.24 **Flooding** - A Flood Risk Assessment (FRA) has been prepared by WHS and is included in the Environmental Statement and is submitted with the application. The Assessment confirms that the application site falls within Flood Zone 1 which the NPPF confirms is an area with the lowest probability of flooding. New surface water and foul water sewer networks will be constructed to service the proposed scheme.
- 7.25 Surface water will be managed through a sustainable drainage system, comprising a series of swales leading to an attenuation pond in the north of the site which will in turn restrict the rate at which surface water is discharged from the site and will take in to account the potential future impacts of climate change.
- 7.26 **Ecology** - There are no statutory designations of nature conservation value within or immediately adjacent to the Application Site.

- 7.27 The site is within the 7.7km catchment zone around the Severn Estuary within which Natural England and Stroud District Council have determined that the provision of additional dwellings may lead to adverse effects on the Severn, as a result of increased visitor pressure.
- 7.28 The site is also 140m away from the River Cam (although separated from it by a residential area), which is a tributary of the Severn Estuary and may be functionally linked to it.
- 7.29 The site is situated between Woodchester Park Site of Special Scientific Interest (SSSI), which is 5km to the east, and the Wye Valley and Forest of Dean Bats Special Area of Conservation (SAC), which is 14km to the west. These sites are designated for horseshoe bats, which have been recorded travelling between the two sites. Linear features suitable for commuting horseshoe bats may therefore be functionally linked to the SAC and SSSI colonies. Other statutory sites within 10km of the proposed development include Frampton Pools SSSI and Stinchcombe Hills SSSI.
- 7.30 There are no non-statutory designations of conservation value within or immediately adjacent to the Application Site.
- 7.31 The desire to protect existing trees and hedgerows has been fundamental to the masterplanning process, and essential for species conservation and reducing the landscape and visual impact.
- 7.32 Where possible, new hedgerows and trees are proposed through the incorporation of 'green fingers', breaking up the built form and reducing the impact from visual receptors and creating a green infrastructure network through the site to link to the wider network supporting existing ecological value.
- 7.33 Design SuDS features and a drainage strategy to provide recreational, visual and ecological benefit; and achieve an overall net gain in biodiversity.
- 7.34 As a result, the proposed scheme will deliver biodiversity enhancements and betterment compared to that of the existing land use.
- 7.35 **Heritage** – An Historic Assessment had been completed which revealed that there are no designated heritage assets within the site, and no World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields or Conservation Areas within the Study Area. The assessment

concludes that no significant environmental effects will arise with regard to cultural heritage as a result of the Proposed Development.

7.36 The Heritage Assessment established that there is an archaeological interest within the site, defined as the potential for the presence of buried archaeological remains, in particular relating to earthworks which demonstrate medieval and post medieval agricultural practices. There is a likelihood that earthworks have the potential to overlie archaeological remains, which would likely be of Iron Age or Romano British origin.

7.37 The Assessment concludes that:

“The evaluation identified two areas of archaeological focus within the site, with features revealed in only nineteen of the seventy-two excavated trenches. Where archaeological features were encountered, they corresponded well with the results of the preceding geophysical survey (Wessex Archaeology 2020b) which confirms that the results of the geophysical survey appear to be good, and reflect the levels and locations of archaeology across the site.”

“The proposed development is unlikely to result in any adverse impacts to the settings of any designated or non-designated heritage assets within the wider landscape surrounding the site.

The Historic Landscape Character of the proposed development site is of limited significance. Although development of the site would fundamentally alter its character, this would not constitute an appreciable loss to the wider historic environment resource.”

7.38 **Noise** - Noise modelling has been undertaken to inform the masterplanning process, specifically regarding the M5 and railway line to the north west and to the north of the site, respectively.

7.39 As a result a noise bund, comprising an earth bund with planting and an acoustic fence is to be created along the northern western and northern boundary of the site. The 3 meter high acoustic fence will line the top of the bund, with the earth bund varying in width and height, influenced by the relative height of the carriageway from the land.

7.40 In addition there are positive benefits from the development, in terms of supporting the economic recovery. Recent Government announcements have stated how important the construction industry is to economic recovery from the

COVID 19 pandemic. The construction industry will provide short term jobs and the development as a whole will support expenditure in the local economy.

- 7.41 To conclude, it has been demonstrated that the proposed development on part of PS24 accords with Cam’s position in the settlement hierarchy, as a Tier 1 settlement. Moreover, it has been demonstrated that the emerging allocation is capable of accommodating additional development to that envisaged in the emerging Stroud Local Plan review, as the site is unconstrained and thereby enabling the efficient use of the land. Overall, the site provides a logical extension to the settlement of Cam, the site is available now and housing can be delivered within the plan period, with no major infrastructure required.
- 7.42 The proposed development is consistent with the NPPF taken as a whole contributing to the three objectives of sustainable development, increasing the supply of housing at a sustainable location within the District which is consistent with the strategy in both the adopted Local Plan and the emerging Local Plan and providing a contribution to meeting affordable housing needs.
- 7.43 An Environment Statement has been prepared and concludes that the design of the Proposed Development has taken account of the likely significant environmental effects (alone and in-combination with other cumulative sites) and where necessary, mitigation measures form an integral part of the Proposed Development to ensure that the environment is suitably protected.
- 7.44 The ES demonstrates that there are no overriding environmental constraints which would preclude the Proposed Development on the Application Site.
- 7.45 In conclusion any adverse impacts do not significantly and demonstrably outweigh the benefits, such that permission should be granted.

8. SUMMARY AND CONCLUSIONS

- 8.1 The Planning Statement has been prepared on behalf of Robert Hitchins Ltd and their successors in title to the land in support of an application for outline planning permission for a development comprising up to 235 dwellings, associated works (including demolition/removal of existing buildings/structures), infrastructure, ancillary facilities, open space and landscaping with vehicular access from the A4135. All matters of detail relating to appearance, access, landscaping, layout and scale are reserved for subsequent approval, as such the determination is limited to matters of principle.
- 8.2 The application is submitted with a number of supporting documents and an Environmental Statement as required by the District Council's Validation Checklist.
- 8.3 The proposed development is consistent with the NPPF contributing to the three objectives of sustainable development and increases the supply of housing in Stroud District in general accordance with the spatial strategy of the adopted Plan; although the site is not allocated for housing, it is proposed in the emerging Local Plan Review and is part of site PS24 West of Draycott.
- 8.4 The site is suitable, available and deliverable for housing, and has capacity for up to 235 dwellings (including affordable housing). The site benefits from a location in close proximity to services and amenities in Cam. As such the site is sustainable economically, socially and environmentally.
- 8.5 The proposed development meets the general objectives of increasing housing production in a sustainable manner; it also reflects the need and demand for housing within the District, reflecting the accommodation requirements of a variety of groups and provides much needed affordable housing.
- 8.6 The site provides the opportunity to deliver new homes in the early period of the emerging plan, ahead of the allocations elsewhere in the district. The site is therefore suitable, available and deliverable and can deliver within the early part of the emerging plan period.
- 8.7 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. For decision making this means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most

important to determining the application are out of date⁷, granting planning permission unless:

- i. **the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or**
- ii. **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.**

8.8 The site is environmentally unconstrained and the proposals will not lead to any unacceptable harm in terms of impact on highway safety, flooding, heritage assets, landscape or biodiversity.

8.9 The proposals make effective use of the land, the site will deliver much needed market and affordable housing. The proposal will be constructed in a sustainable manner.

8.10 The site helps to contribute to an increased supply in housing land (both open market and affordable) in accordance with the spirit of the NPPF and the emerging Local Plan and it will bring about a significant number of other benefits to the area.

APPENDIX 1

DRAFT S.106 HEADS OF TERMS



**Land north-west of Cam
DRAFT HEADS OF TERMS
(June2021)**

The following Draft Heads of Terms deal with site specific matters, the remainder being covered by Stroud's Community Infrastructure Levy.

For the avoidance of any doubt there will be separate legal agreements for that part of the allocation not the subject of this application for planning permission.

As the planning application is in outline there is no requirement to complete and submit a CIL Planning Application Additional Information Form.

Public Open Space/Recreation Provision

1. At the same time as submitting an application for approval of reserved matters pursuant to the permission, details as to the provision of Public Open Space for that phase shall be submitted to the Council. The Developer will lay out the Public Open Space/Recreational Space as approved under the reserved matters application and having received written confirmation from the District Council that the Public Open Space/Recreational Space has been laid out to its reasonable satisfaction thereafter to retain maintain and manage the Public Open Space/Recreational Space in accordance with a Landscape Masterplan for a minimum period of 12 months AND to ensure that the Public Open Space is retained as publicly accessible areas.
2. Upon expiry of said 12 months to invite the District Council to inspect the Public Open Space/Recreational Space and upon confirmation from the District Council that the Public Open Space/Recreational Space has been properly maintained to its reasonable satisfaction, the Developer may (at its discretion) either
 - offer to transfer the Public Open Space/Recreational Space to the Borough Council or such other body nominated by the Borough Council; or;
 - transfer the Public Open Space/Recreational Space to a Management Body.
3. In the event that the Public Open Space/Recreational Space is transferred to the District Council, the Developer will pay a commuted sum to the District Council for

the future maintenance of the Public Open Space/Recreational Space. In the event that the Public Open Space/Recreational Space is transferred to a Management Body it shall be on terms requiring the Public Open Space/Recreational Space to be managed and maintained in accordance with a Landscape Masterplan.

Affordable Housing

4. A policy compliant % of the new dwelling units shall be used exclusively for the purposes of “Affordable Housing” as defined by the National Planning Policy Framework.
5. The Affordable Units will consist of a range of dwelling types, tenures, and sizes to be agreed.
6. The Developer shall use all reasonable endeavours to ensure that the Affordable Housing Units shall be constructed contemporaneously with the Market Housing save where non provision of the entirety of the Affordable Housing is not due to the demonstrable fault of the Developer.
7. The Affordable Housing shall be designed and constructed to no less a standard than and be visually indistinguishable from the market housing.

Education

8. The Developer will make such contribution as can be lawfully justified under the CIL Regulations to meet the capital costs of any additional capacity required to accommodate the educational needs of future occupiers of the development.

Severn Estuary Mitigation Strategy

9. The developer will, if necessary, make a contribution pursuant to the Council's adopted Strategy for the Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC

Legal Costs

10. The Developer shall pay to the District Council on or before the completion of the Agreement their reasonable legal costs in connection with the preparation and completion of the Agreement.