



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

20th January 2020
E-MAIL ONLY

Dear Sir/Madam

**Stroud District Local Plan Review, Draft Plan for Consultation November 2019
Draft Plan New Sites Submission**

HOOK STREET FARM, LYNCH ROAD, BERKELEY, GL13 9TF

This letter accompanies a completed “Site Submission Form” (submitted online via Stroud District Council’s website) on behalf of “Prestige Developments Ltd” (the owner) in respect of land at Hook Street Farm, Lynch Road, Berkeley. The site is considered to be suitable for residential development in the form of open market housing, affordable housing and self-build to meet local needs together with a new community use/open space. The site is available and deliverable for residential development and this submission provides additional information to assist in the consideration of the site’s suitability for development.

The Site (Hook Street Farm)

Hook Street Farm is a circa 7 ha, mixed brownfield/greenfield site located on the edge of the settlement of Berkeley (shown on the Plan at **Attachment 1**). Berkeley is one of the District’s largest settlements with a population of around 2000 people (2011 Census). It is identified as a Local Service Centre (a tier 2 settlement) in the District’s Settlement Hierarchy (Stroud District Local Plan (SDLP), November 2015 **Policy CP3**). Tier 2 settlements “...have the ability to support sustainable patterns of living because of their current levels of facilities, services and employment opportunities. They have the potential to provide for modest levels of jobs and homes in order to help sustain and, where necessary, enhance their services and facilities, promoting better levels of containment and viable, sustainable communities” (P. 30). The Stroud District Local Plan Review (Consultation Draft November 2019) continues to identify Berkeley as a Tier 2 settlement in emerging **Core Policy CP3** where modest levels of growth will be supported.

The site is well located in relation to the existing settlement of Berkeley, lying just to the west of the settlement boundary (see **Images 1 and 2**). To the south is agricultural land and residential properties on Lynch Road (including a site recently developed for 10 affordable houses on Butler Close to the south east of the site and a community meadow (Sarah’s Field). To the west is a residential Park Home site (Berkeley Vale Park). To the north is agricultural land and the east is the edge of the settlement of Berkeley, with properties on James Orchard forming the boundary with the site (see **images 2 and 3**).



Image 1 – Extract of Stroud District Council Policies Map (Source:www.stroud.maps.argis.com)

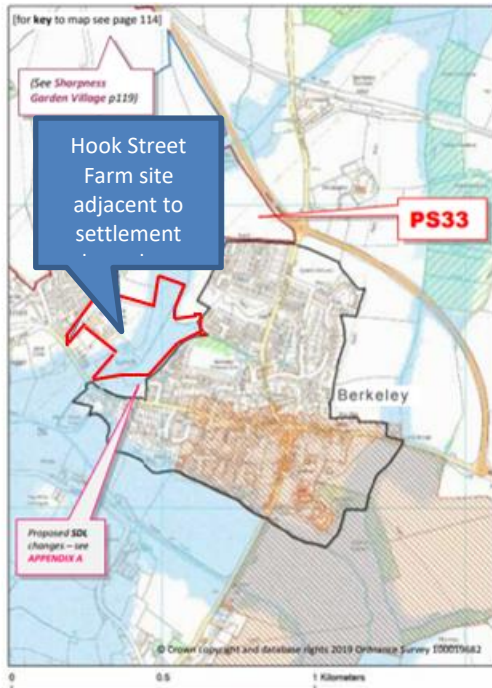


Image 2 – Extract of Stroud District Council Map showing the proposed site and Berkeley settlement boundary

The site currently comprises a mix of uses. The brownfield land contains various buildings including a residential dwelling (Use Class C3), private storage unit (Use Class B8), light industrial (Use Class B1(c)) units and parking for commercial vehicles. The remaining land is agricultural land. The full extent of the site and existing buildings is shown on the site plan and aerial phototroph (image 3 and 4 below).

Hook Street Farm does not contain any listed buildings nor are there any significant listed buildings in close proximity to the site. The site is not in a Conservation Area.

A watercourse runs north/south through the site. As shown on the Environment Agency Flood Map for Planning (**image 5**), land to the east and west of the watercourse is floodplain and is within the Environment Agency's Flood Zone 3. Hook Street Farm buildings and land immediately to the north are in Flood Zone 1). The strategy for the development of the site would be to develop land in Flood Zone 1 for residential purposes and use the land in Flood Zone 3 for appropriate Flood Zone uses (i.e. less vulnerable or water compatible uses such as community use, amenity space/nature conservation). There are no other known environmental constraints on the site.

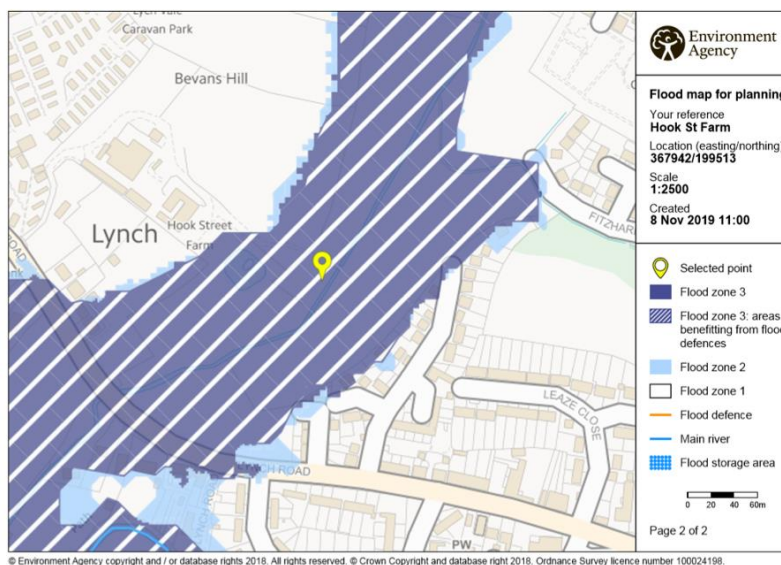


Image 5 – Environment Agency Flood Map for Planning (Source: <https://flood-map-for-planning.service.gov.uk>)

The site is well located to existing services, facilities and public transport links in Berkeley. Local services and facilities in Berkeley include a doctors, dentist, bank, post office, pre-school primary school, further education college, library, pub, place of worship, playing fields and play area.

There is an existing access onto the adopted highway (via Lynch Road) directly from the site and a secondary access to the north (identified as the upper access on the Masterplan drawing). There is no infrastructure within, over or under the site that restricts its development. Connections to water and sewerage are on site serving the existing buildings, further confirming that the site can be delivered.

An initial analysis of the site has confirmed that the site is suitable, genuinely available and deliverable for development. To our knowledge the site has not previously been considered as part of the Local Plan Review process or the Strategic Assessment of Land Availability (SALA).

Proposed Development

As shown on the Master Plan, the site is promoted as having the potential to deliver approximately 38 dwellings of a range of types and sizes and represents a candidate site that can be delivered during the early years of the Plan period. The site has the flexibility to provide for a range of market and local needs housing, including to meet the needs of small single person households and larger family housing, households for older people, first time buyers, self-build and custom build housing (all of which are identified in the emerging housing strategy p.35 of the SDLPR).

Whilst SDC are currently meeting the national requirement to provide a 5 year supply of housing land, there is increasing demand nationally to boost the supply of homes. The housing requirement in the emerging Local Plan Review represents a 40% increase from the figure in the current Local Plan demonstrating the growing need for homes in the District. The inclusion of the site at Hook Street Farm would contribute to ensuring that the Council were able to meet their 5 year housing supply and additionally has the potential to help meet some of the local housing needs in the district (subject to viability considerations).

Planning History

The table below shows the planning history of the site

REFERENCE	ADDRESS	PROPOSAL	DECISION	DATE
S.19/0886/P3PA	Building at Hook Street Farm, Lynch Rd, Berkeley	Prior Approval for change of use from storage to 6 no. dwellings	Withdrawn.	May-July 2019
S.19/0268/P3PA	Building at Hook Street Farm, Lynch Rd, Berkeley	Prior Notification for change of use from light industrial to 5 x 2 bed dwellings (176 sq.m)	Prior Notification Granted	02.04.2019
S.05/1094/FUL	Building at Hook Street	Extension to existing light industrial/storage	Approved	07.07.2005

	Farm, Lynch Rd, Berkeley	unit (retrospective)		
S.05/1095/COU	Hook Street Farm, Berkeley	Change of use of land to domestic garden	Approved	07.07 2005
S.04/0975/CPE		CoL continued occupation of dwelling without agricultural occupancy condition	Approved	13.09.2004
S.03/C0332/CPE	Building at Hook Street Farm, Lynch Rd, Berkeley	CoL continued use of buildings for Light Industrial purposes	Withdrawn	27.01.2004
03/421	Buildings at Hook Street Farm, Lynch Rd, Berkeley	Change of use of farm buildings to B1 use	Refused	29.05.2003
02/787	Pond at Hook Street Farm	Retention of embankment surrounding pond	Approved	11.03. 2003
00/924		Erection of single storey extension	Refused	06.09.2000
00/497		Change of use from agricultural buildings and adjacent yard to permit private storage of vehicles	Approved	18.05.2000

Prior Approval currently exists for the conversion of one of the buildings on site to 5 no. 2 bedroom dwellings.

Relevant Planning Policy

National Planning Policy Framework (February 2019)

One of the Government's overarching objectives to achieve sustainable development (as set out in **para 8** of the NPPF) is a social objective:

"To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being".

Paragraph 59 confirms that:

"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".

In identifying land for homes, **paragraph 67** of the NPPF requires planning policies:

"... identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability."

It states that:

"...Planning Policies should identify a supply of :

- (a) Specific, deliverable sites for years one to five of the plan period, and*
- (b) Specific, deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan".*

The proposed site at Hook Street Farm has the potential to meet the help housing requirements of Stroud District in the immediate (1-5 year period). The site is immediately available, does not have any ownership constraints and as set out in more detail below is suitable and economically viable as a future development site for housing.

With regard to delivering a wide choice and high quality homes **Paragraph 61** of the NPPF encourages local planning authorities to:

"... plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as but not limited to, families with

children, older people, people with disabilities, service families and people wishing to buy their own home) ...”

The site at Hook Street Farm has the potential to be developed for either/both market housing and housing to meet local needs, as well as providing land for community use/open space. The site is well located, adjacent to the settlement of Berkeley with the potential for future development to be well integrated into the existing settlement.

National Planning Practice Guidance (NPPG) (Updated July 2019)

With regard to assessing housing land availability, **Paragraph 11** (Reference ID: 3-011-20190722) of the NPPG sets out the types of sites which should be included in the assessment. One of the categories is *“Sites in and adjoining villages or rural settlements and rural exception sites”*.

The land at Hook Street Farm adjoins a tier 2 settlement where modest development is encouraged. It is suitable and available for development and would help meet the Council’s supply of land for new homes over the future plan period.

Stroud District Local Plan Review - Draft Plan 2019 (SDLPR)

To support the SDLPR, the Council have prepared a Local Housing Needs Assessment which identifies the amount and types of housing that are likely to be needed during the Plan period to 2040. **Paragraph 2.42** of the SDLPR states that:

“The assessment confirms the Government’s requirement for the Draft Local Plan to provide for at least 638 new homes per year. This is a 40% increase from the figure in our current Local Plan of 456 homes per year. Last year 564 homes were built in the District”.

Paragraph 2.44 confirms that some of the dwellings likely to be built from 2020 either have permission or a firm commitments. It confirms that:

“The latest assessment of the likely housing supply means that the residual number of homes that the Draft Local Plan must identify is actually at least 8,000 dwellings...”

The Plan also goes on to caveat (para 2.45) that:

“the Government is reviewing the methodology behind the housing requirement and the detailed supply will have changed by submission of the Draft Plan by November 2020. So these figures need to be kept under review and there may be further changes to the housing supply identified in the final Local Plan”.

The Plan proposes a strategy for the deliverability of new dwellings in line with its growth strategy. This includes housing at the existing main settlements on the edge of Gloucester; at two new settlements (Newton/Sharpness and Wisloe); modest growth at the local service centres (including **Berkeley** (our emphasis)); lesser levels of housing at tier 3a settlements, with other housing proposals supported in accordance with the Draft Plan's Settlement Hierarchy. The proposed deliverability of housing at Berkeley in the Draft Local Plan Review is fully supported and the inclusion of the site at Hook Street Farm for future residential development would be consistent with this approach to growth.

The Plan identifies the strategy to bring forward *"a mix of brownfield and greenfield allocated housing sites of varying sizes to ensure delivery is maintained throughout the plan period"* (p. 35). This strategy is further supported and the inclusion of the mixed brownfield/greenfield site at Hook Street Farm would be in accordance with this strategy and help ensure housing delivery is maintained throughout the plan period.

Emerging **Core Policy CP2** identifies the strategic growth and development locations. It includes identifying a site for 120 new homes at Berkeley. This proposed allocation (shown at P33 on **image 2** above) is to the north west of Berkeley, lying to the north east of Hook Street Farm. Given the size and availability of services and facilities in Berkeley it is considered that the settlement can accommodate an additional housing allocation at Hook Street Farm (as indicated in **image 2** above and on the Proposed Master Plan to help meet the Council's overall housing need and ensure flexibility in delivering the Plan targets.

Emerging **Core Policy CP3** contains a hierarchy for growth and development across the District's settlements. Berkeley is identified as a Tier 2 Local Service Centre. With regard to Tier 2 Settlements, **Policy CP3** states that:

"These market towns and large villages have the ability to support sustainable patterns of living in the District because of the facilities, services and employment opportunities they each offer. They have the potential to provide for modest levels of jobs and homes, including through sites allocated in this Plan, in order to help sustain and, where necessary, enhance their services and facilities, promoting better levels of self-containment and viable, sustainable communities. Further development will be achieved through strategic allocations, development within settlement development limits, town centres and employment sites and (exceptionally) adjacent to settlement development limits, subject to fulfilling the criteria set out in the Plan's Core and Delivery policies".

The emerging SDCLPR clearly supports the principle of additional growth in Berkeley. As set out below, the proposed site at Hook Street Farm has the potential to significantly contribute towards meeting the housing need in the District and address the Government's aim of significantly boosting the supply of homes.

Justification for inclusion of Hook Street Farm in the SDLPR

It is considered that the land at Hook Street Farm is suitable for open market/local needs housing and a new open space/community use development for the following reasons:

- Development for additional housing in Berkeley would accord with location criteria set out in adopted and emerging **Policies CP2 and CP3**.
- Delivery of approximately 40 residential dwellings comprising a mix of open market, affordable and self-build.
- It is a mixed brownfield/greenfield site adjacent to the settlement boundary of Berkeley and would form a logical extension to the settlement.
- The redevelopment of the brownfield site represents an efficient and sustainable use of land which accords with the emerging strategy in the SDLPR. Future development has the potential to secure a landscape improvement through the removal of the existing buildings on site.
- Redevelopment of the site would provide the opportunity to link the Park Home site (Berkeley Vale to the west) to the settlement of Berkeley.
- The preferred direction of housing growth in landscape terms identified in Section 3.5 of the Draft Local Plan Review is to the north west and west of the settlement. Hook Street Farm lies to the west of the settlement and thus accords with the preferred direction of housing growth in landscape terms.
- Direct vehicular and pedestrian access to the site exists from Lynch Road. The landowner is in control of all the land and therefore unhindered access to the site can be obtained.
- Development of the site would secure a new community/open space use to meet any local identified needs.
- Much of the site is within Flood Zone 1 and at the lowest risk of flooding. Land within Flood Zone 3 is proposed to be used for a less vulnerable/water compatible use such as open space/recreation or community use which would satisfy flood risk issues and the requirements of the Environment Agency.
- The site is in a sustainable location adjacent to the existing settlement which has a range of local services and facilities including a doctors, dentist, bank, post office, pre-school primary school, further education college, library, pub, place of worship, playing fields and play area.
- The site does not contain any listed buildings and is not within a Conservation Area.
- The site does not have any known contamination issues. The site is partially in use for existing residential purposes.
- The site is not covered by any specific wildlife designations, although it is acknowledged that appropriate surveys would be undertaken should the site come forward for development.
- The site benefits from existing utilities and infrastructure provision.
- The site is economically viable.



At this stage we also request that the previously developed (brownfield) part of the site (i.e. the land occupied by buildings) be assessed for inclusion in the Council's Brownfield Land Register.

Summary

There is a clear drive in both national and local planning policy to boost the supply of new homes including the provision of both market and affordable housing to meet local needs. The identification of the land at Hook Street Farm as a future site for residential development to help meet future housing requirement is compliant with the thrust of existing policy. The site is located adjacent to the settlement boundary of Berkeley, a sustainable tier settlement, offering a range of local services and facilities and public transport and where modest growth is encouraged.

The site is available, suitable and deliverable and in this regard it is requested that it is considered as a site as part of the Stroud District Council Local Plan Review.

Please do not hesitate to contact me should you wish to discuss any aspect of this advice or should you wish to progress further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stuart Rackham'.

Stuart Rackham
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Enc. Masterplan; Site Location Plan

CC: Prestige Developments Ltd; David Cahill Design Consultant