
Consultation Response to Stroud District Local Plan Review Emerging Strategy Paper

Prepared by Savills
on behalf of The Berkeley Estate



1. Introduction

- 1.1 These representations are made in response to Stroud District Council's (SDC) consultation on the Stroud District Local Plan Review Emerging Strategy Paper (ESP), which was published on 16 November 2018 and is subject to a nine week consultation period which ends on 18 January 2019.
- 1.2 The representations are submitted by Savills on behalf of The Berkeley Estate (TBE) which has significant land interests in the south western part of the District. Specific comments are made in respect of interests at land to the north east of Berkeley, land south of Newtown, land at Focus School and land at Wisloe.
- 1.3 Overall, TBE supports the Council in delivering the ESP which is essential to ensure an up-to-date, co-ordinated and managed response to the economic, housing and infrastructure needs of the district during the plan period.
- 1.4 A positive, proactive and flexible approach to development will be essential to ensure a continuous supply of land across the local authority area and to maintain plan-led delivery.
- 1.5 The representations are divided into sections, setting out responses to relevant questions and options raised in the Consultation Paper. However, they are focused on issues relevant to the land with TBE's ownership.
- 1.6 It is hoped that these representations are of assistance to the Council in preparing the next stages of the revised Local Plan. TBE intends to engage with all stages of the Local Plan Review to assist the Council in delivering a robust Local Plan.

2. Response to Consultation Questions

Stroud District Local Plan Review Emerging Strategy Paper

Q.2.3a: *Do you agree with the ways in which the emerging Strategy intends to meet local housing need?*

- 2.1 The ESP sets out a range of measures for housing delivery which it will seek to implement. These include a mix of brownfield and greenfield allocated sites of varying sizes to ensure delivery is maintained throughout the plan period.
- 2.2 TBE is supportive of a mixed approach to delivery. There should be a focus on making best use of available brownfield sites, but it is recognised that there is an inevitable need to release greenfield land for development to meet the scale of the development requirements of the area.
- 2.3 In addition to the delivery of the main development needs of the District through allocations, TBE also recognises the need for organic growth of smaller settlements to sustain the services and facilities of local communities in rural areas. This issue is addressed further in respect of question Q.4.4 below.

Q.4.2.a: *Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?*

- 2.4 The emerging growth strategy seeks to distribute at least 12,800 additional dwellings and new employment land across the District. This includes a new garden village at Newtown/Sharpness (at Sharpness Dock, Focus School at Wanswell & south/east of Newtown/Sharpness – totalling 2,770 dwellings, 17ha employment, retail, tourism, leisure, community uses & open space) and at Wisloe (1,500 dwellings, 5ha employment, retail, community uses and open space), with smaller pockets of development at the existing settlement of Berkeley (up to 120 dwellings).
- 2.5 TBE is supportive of growth in the south west of Stroud District at a scale which assists in improving the services/facilities and infrastructure serving this part of the District.
- 2.6 However, it is considered that the precise level and distribution of those proposals needs to be carefully considered to ensure that the most appropriate form of development is secured. In that respect, TBE has land which is either already identified as being required to deliver development (at Newtown/Sharpness) or represent logical sites to be included in proposed allocations (at Berkeley and Wisloe) if they are carried through into the adopted Plan. These sites are discussed in further detail below.

Q.4.4.a *Do you support the emerging Strategy's approach towards maintaining settlement development limits?*

Q.4.4.c *Do you support the proposals to allow some limited development beyond settlement development limits?*

- 2.7 The principle of settlement development limits is supported by TBE. It enables clear distinctions in policy approaches to land within developed areas of settlements and land deemed to be outside. This helps to prevent urban sprawl, controlling the transition between settlements and the surrounding countryside, and also to provide a degree of certainty to landowners and developers considering the submission of planning applications.

- 2.8 The strategy proposes to use updated settlement development limits. TBE considers it appropriate and necessary to update the settlement development limits identified in the adopted Plan to ensure that they reflect development that has been undertaken since those limits were drafted and to reflect the latest planning position. This is critical to ensure that the Development Management policies recognise these sites as now forming part of the built-up area.
- 2.9 In particular, TBE consider that the settlement boundary at Berkeley should be extended to include the scope of recent planning permissions and land that is clearly associated with the settlement rather than the surrounding countryside.
- 2.10 This includes the extension of the boundary to the north east of the town to include site BER004, 'Land to the rear of Canonbury Street', from the Strategic Assessment of Land Availability 2017 (SALA 2017) which now benefits from residential planning permission (allowed at appeal on 21 November 2016 for 188 dwellings; LPA Ref 14/0619/FUL, PINS Ref. APP/C1625/W/15/3133335) and is under construction, and to the north of the town to incorporate the proposed allocation at PS33 (SALA 2017 reference BER007). It is the view of TBE that the settlement boundary should be extended to reflect the extent of the built form permitted, as shown in the approved layout below. It would not be appropriate to include the whole of the red line area because the landscaped area to the south of the residential development should remain open to ensure an appropriate buffer between built development and Berkeley Castle.



Approved layout of site BER004, showing extent of built form

- 2.11 As a consequence of the planning permissions identified above, TBE also propose that its land to the north of Berkeley, between the existing playing field and the B4066, is incorporated within the settlement boundary. This site was identified as BER008 'land north of Canon Park sports ground' within the 2017 SALA. The site was not proposed for allocation within the 2017 SALA as it was identified as not being currently available, and with no reasonable prospect of future availability. However, in view of planning permission granted, TBE can confirm that the land is available for development and considers that it represents a logical rounding off of the settlement, with the B4066 representing a strong physical barrier to the northern edge of the town. The detail of this site is considered further below.
- 2.12 TBE is also supportive of policies which allow some limited development beyond the settlement boundaries. This will allow the development control process to adopt a site specific approach for assessing proposals either adjacent to, but outside, settlement boundaries or within rural settlements that are not of sufficient scale to justify settlement boundaries but may be appropriate for some small scale development. This approach will help to support the delivery of development which may represent a logical transition between settlements and the countryside, and organic growth of smaller settlements to help sustain their services/facilities, but would not be appropriate in more rural locations. Policies would need to confirm the scope of development that would be appropriate within these locations, and identify the environmental and design criteria that schemes would be tested against.

Q.4.4.e *Do you support the specific changes to existing settlement development limits that are set out in Appendix A?*

Berkeley (SDL-BER01 at Lynch Road)

- 2.13 TBE has no objection to the proposed amendment to the settlement boundary at Berkeley.
- 2.14 However, as outlined above and considered in further detail below, TBE suggests that a wider review of the settlement boundary is appropriate to ensure that it reflects extant planning permissions and considers the implications of proposed allocations.

Q. 5.1.a *Have we identified the best site(s) at each town and village? Would you like to promote an additional alternative site for consideration through the next SALA?*

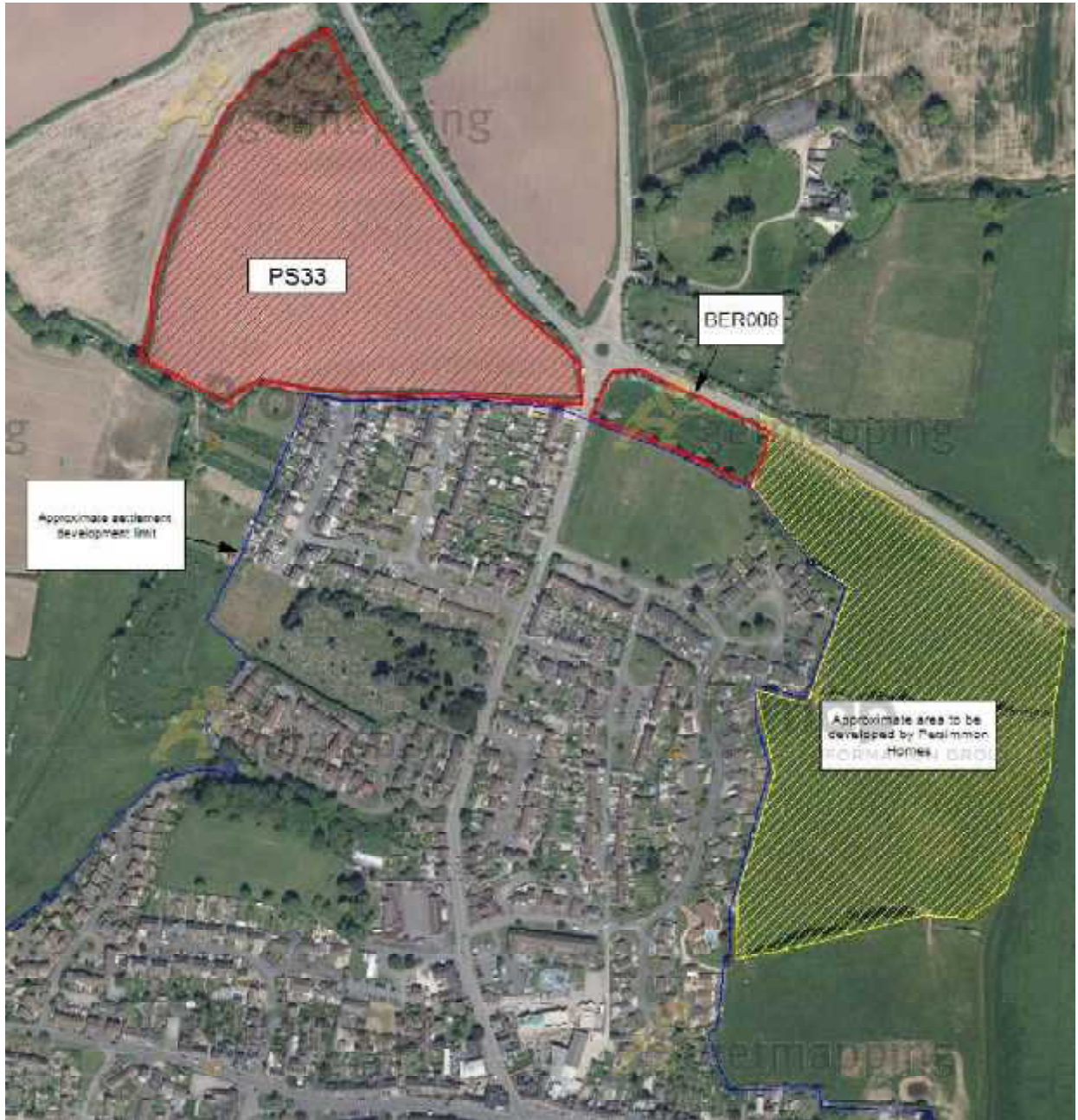
Berkeley: Site PS33, Northwest of Berkeley

- 2.15 TBE notes the intention to allocate this site for development of up to 120 dwellings. If this site is to be carried through to allocation, the evolution of the detailed design of the development will need to give careful consideration to the edge of the settlement that will be created. This matter should be highlighted within policy text.

Berkeley: 2017 SALA Site BER008, 'land north of Canon Park sports ground'

- 2.16 As above, we would like to note that site BER008 is within TBE's ownership and is available for development.
- 2.17 The site was not proposed for allocation within the 2017 SALA because it was identified as "not currently available and there is no reasonable prospect that the site will be available at a point in the future for development". TBE confirm that the land is available for development and would like the land to be reconsidered by the District Council when the SALA is reviewed.

2.18 The site is well contained by development on all sides, and would form a logical rounding off of the town. It is bounded to the south by the existing extent of Berkeley Town, bordering Canon Park sports ground which sits within the settlement development limits. To the east is the first phase of Persimmon Homes' Canonbury Rise development which received planning permission in 2016 and is now under construction. To the west is Station Road, which represents a key north/south artery for the town, and beyond that the proposed allocation at Site PS33, land northwest of Berkeley. To the north is the B4066, known as the 'Berkeley Bypass'. A plan showing the extent of the site and the surrounding context is set out below.



Plan showing development context of Site BER008

2.19 The site has strong landscaping at its boundaries, particularly at the north and western boundaries which, together with the Berkeley Bypass, provide a clear edge to the extent of the town. The view towards the north western corner of the site from the Berkeley Bypass is included below.



View from roundabout at junction of B4066 and Station Road towards north west corner of Site BER008

- 2.20 The site also benefits from an existing access onto Station Road at its western boundary, which is currently used to serve the site. This can be seen in the aerial image below.



Aerial view showing existing vehicular access at western boundary of Site BER008

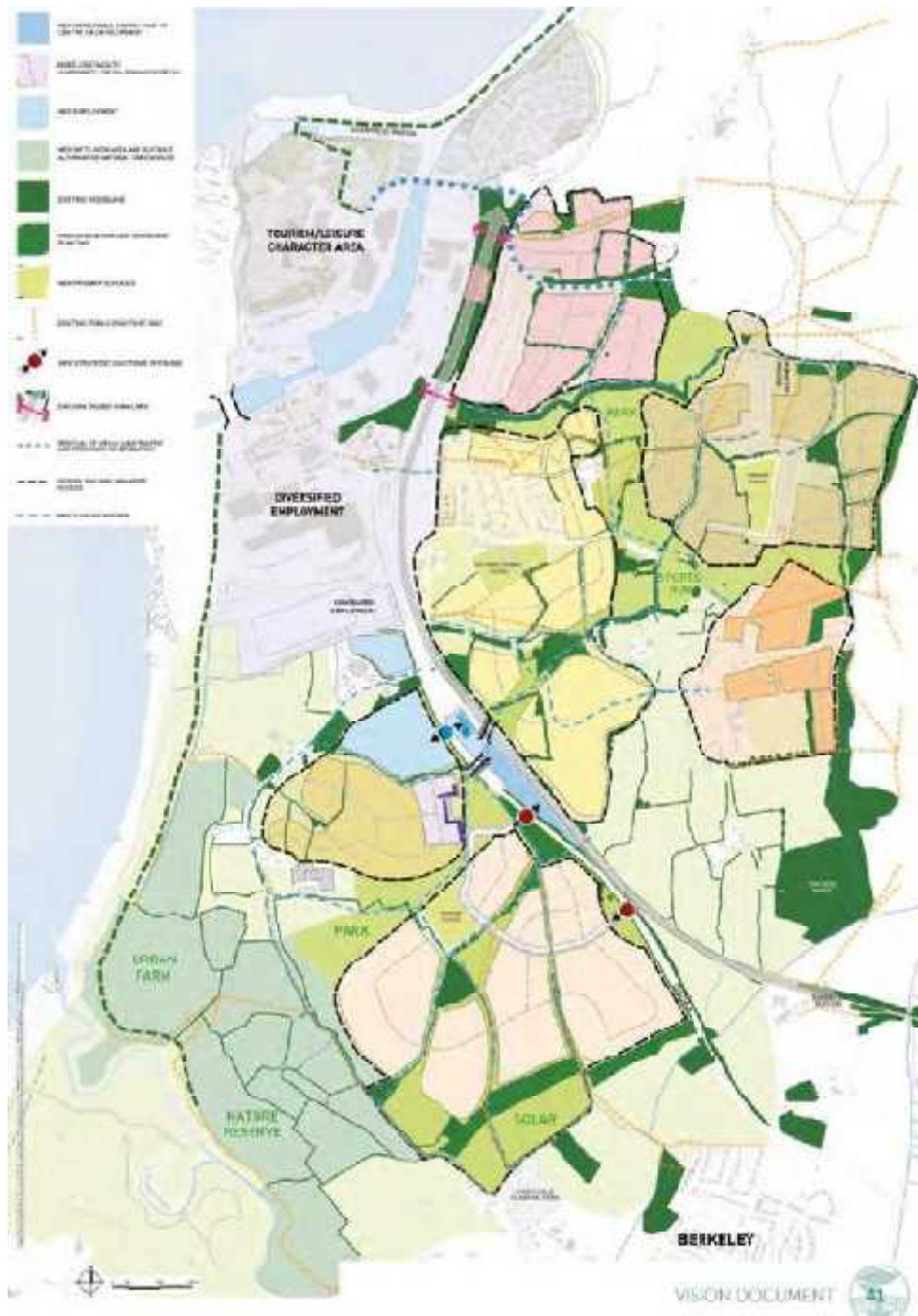
- 2.21 Having regard to the above, the site is considered to represent an appropriate ‘rounding off’ of the town and is appropriate for inclusion as an allocation for residential development.

Newtown and Sharpness: Site PS36 South and east of Newtown and Sharpness

- 2.22 TBE acknowledges the proposed allocation of Site PS36, which identifies an opportunity to develop “up to 2,400 dwellings by year 2040, 10ha employment, retail, community uses and open space”.

- 2.23 The wider site was identified within the 2017 SHLAA as having future development potential (Site NEW002) and has been the subject of extensive work by the developers to evidence that the site is suitable, available and achievable.

- 2.24 The Indicative Masterplan produced by the developers is included below for reference.



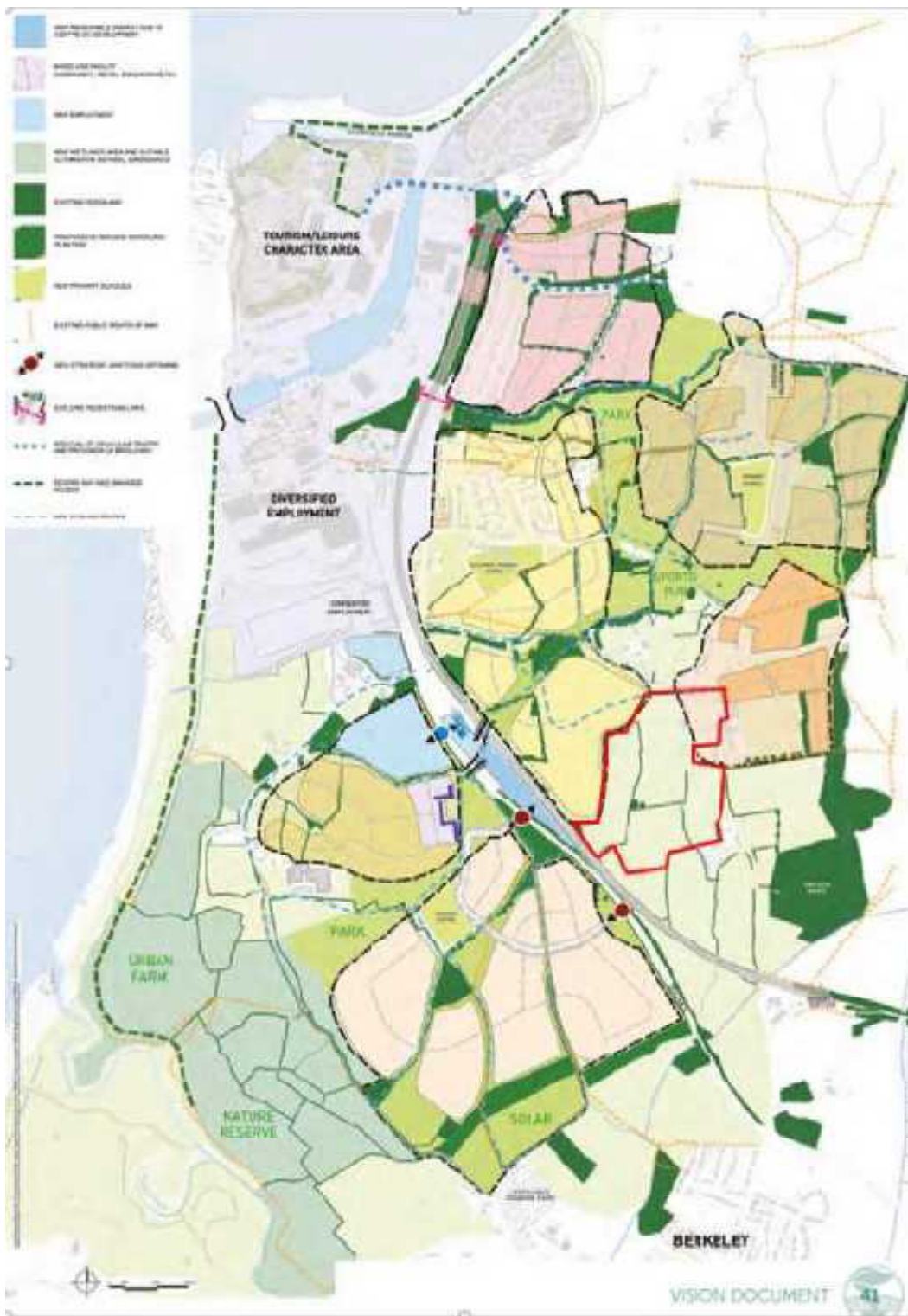
Indicative Masterplan for PS36 (which also includes PS34 'Sharpness Dock')

2.25 TBE owns a parcel of land within the south eastern part of the allocation. The extent of the land in question is identified below.



Plan identifying extent of TBE's land ownership within site PS36

- 2.26 TBE confirm that, if the Council consider it appropriate to continue with the allocation, TBE's land is available to ensure that the development produces the most appropriate form of development.
- 2.27 As can be seen from the plan below, the Indicative Masterplan produced by the potential developers shows TBE's land within the 67.9ha of identified Suitable Alternative Natural Greenspace (SANG), which it is suggested could include a Nature Reserve and an Urban Farm.



Plan showing indicative location of land within TBE's ownership within the context of the Indicative Masterplan

- 2.28 It is important that the layout of any development delivered at the allocation is evolved as a collaborative approach, with all interested parties involved, to ensure that the proposal delivers the most appropriate form of development for the area. TBE have not been party to the evolution of the detailed proposals to date, but will engage as appropriate as the allocation progresses through the plan process.
- 2.29 As the proposed developers of the site do not yet have a controlling interest in TBE's land, it will be important that the wording of any allocation of the site ensures that the subsequent planning

application(s) is required to secure delivery of all the land/development required to support a comprehensive proposal.

Newtown and Sharpness: Site PS35 Land at Focus School, Wanswell

- 2.30 TBE acknowledges the proposed allocation of Site PS35 (forming part of Site NEW002 in the 2017 SALA) which identifies land at Focus School, Wanswell, to deliver up to 70 dwellings.
- 2.31 The extent of the site is well related to the village of Wanswell, and includes the brownfield elements associated with Focus School. However, TBE proposes that if the allocation is to be brought forward, the extent of the allocation is reviewed to ensure that a more considered form of development can be delivered, which better responds to existing physical features.
- 2.32 TBE controls land to the north and east of the proposed allocation, as identified in the plan below. This land is within TBE's ownership and is available for development in the event that the allocation proceeds.



Plan showing relevant extent of TBE's land ownership adjacent to site PS35

- 2.33 TBE propose that, if the allocation proceeds, its land is included within this allocation to secure a more considered extent to the site. The inclusion of this land within the allocation would allow the site to be developed up to the existing physical barriers provided by Halmore Lane to the north and the established belt of woodland to the east. The extent of these features in relation to the allocation can be seen on the aerial photo included below.



Aerial photo identifying woodland belt to the east and Halmore Lane to north of proposed allocation PS35

- 2.34 The land is located within Flood Zone 1 and, although it is located in a SSSI Impact Risk Zone, it does not have any other environmental/landscape constraints.

Wisloe: Site PS37 Land at Wislow

- 2.35 TBE is aware of the proposed allocation at site PS37, land at Wislow, to deliver 'at least 1,500 dwellings, 5ha of employment land, retail, community uses and open space.
- 2.36 TBE is unclear of the advantages/disadvantages of the allocation. However, if the Council determines that the allocation should proceed, TBE proposes that the extent of the allocation is reviewed to ensure that a more considered form of development can be brought forward, which better responds to existing physical features.
- 2.37 TBE owns a parcel of land that is adjacent to the allocation, directly to the west. The land sits to the south east of the roundabout at the junction of the A38 (Bristol Road) and A4135. The extent of the land in question is identified below.



Plan identifying TBE's land ownership adjacent to PS37

- 2.38 TBE confirm that the land is available for development if the allocation proceeds.
- 2.39 This field is closely related to the extent of the identified allocation and would provide a strong western edge to the extent of the proposed development to be delivered through Site PS37. The features are identified within the aerial image included below.



Aerial photo identifying TBE's land, the A38 (Bristol Road) and the A4135

2.40 The site is located in Flood zone 1 and although it is located in a SSSI Impact Risk Zone, it does not have any other environmental constraints.