



Our Ref:  
Your Ref:

14 January 2020

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

Issued via email [local.plan@stroud.gov.uk](mailto:local.plan@stroud.gov.uk)

Dear Sir / Madam

**Stroud Local Plan Review – Representations submitted on behalf of Redrow Homes Limited with specific reference to the proposed allocation of land Northwest of Berkeley (Site PS33).**

We hereby submit these representations on behalf of Redrow Homes Limited with regards to their interest at Berkeley which is identified in the Draft plan for Consultation as the potential site allocation PS33. **These representations therefore seek to demonstrate that the site PS33 Northwest of Berkeley should continue to be taken forward as a preferred option for growth as it is considered suitable, available and now, deliverable.**

### **Context**

This submission follows our representations in January 2019 and December 2017 respectively (noting GVA now trades as Avison Young) and should therefore be read in conjunction with our earlier comments and detailed technical submissions.

These representations will focus predominantly on draft site allocation PS33 within the Stroud Local Plan Review: 'Draft Plan for Consultation'. In addition, it should be noted that these representations follow the recent submission of a full planning application to the Council for the development of 107 dwellings, including 32no.affordable, with associated landscaping, car parking and open space on site allocation PS33. The proposed site layout and landscape masterplan is attached as **Appendix 1**. We are happy to provide further application details upon request or following registration of the application, the full package will be available to view on the Council's website. We do wish to note however that the application includes a full suite of supporting documents which demonstrate that there are no technical or design constraints which preclude the development from coming forward immediately.

St Catherine's Court  
Berkeley Place  
Bristol  
BS8 1BQ

  
**avisonyoung.co.uk**

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

We have completed the requisite form with the relevant contact information, but the text of our representation is provided below in the order that the policies appear in the draft document.

### **Site Allocation PS33 Northwest of Berkeley**

PS33 Northwest of Berkeley states:

*“Land northwest of Berkeley, as identified on the policies map, is allocated for 120 dwellings and associated community and open space uses and strategic landscaping along the northern and eastern boundaries. Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements. 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.”*

We support the above site allocation in principle and the broad thrust of the supporting policy text. However in light of the detailed planning application proposals, resulting from a full assessment of the site, we would wish to see the policy reflect the submitted scheme wherever possible.

#### Amount

We note that the parcel of land is allocated for **120** dwellings. Following a full suite of technical work and assessment of the site capacity from a design and landscape perspective, the submitted application makes provision of 107 dwellings. As shown on the plans at **Appendix 1**, we have identified the developable area of the site as the most eastern ‘two third’ of the site, with public open space provision, and the attenuation basin along the most western boundary. This design arose in response to the existing site conditions and constraints. In light of its identified retention for landscape, the small copse area to the north-western corner of the PS33 allocation, known as ‘The Fishers’ has been omitted from the development proposal’s site location plan, resulting in a reduced site area.

In addition to the above, the design of the development proposal seeks to respond to the gradient of the site, sloping downwards from east to west, as well as the flood risk on site, with the western periphery of the site being included within flood zones 2 and 3, while the wider site, including the developable area lies entirely within flood zone 1. Lower density development is also proposed along the edges of the site which overlook the Public Open Space and existing green infrastructure. **In light of the above, we would recommend that the wording of the policy be amended to being allocated for ‘approximately 110 dwellings’.**

#### Use

We also note the wording of PS33 refers to the provision of ‘associated community and open space uses and strategic landscaping along the northern and eastern boundaries’. The application proposals accord with this but we seek to ensure that the policy wording avoids any potential ambiguity going forward. In addition to significant strategic landscaping on the site boundaries, the development proposal, as submitted, includes substantial, publically accessible, informal open space provision to the western portion of the site, amounting to 35% (excluding attenuation) of the total site area, as demonstrated by **Appendix 1**. We would wish to clarify that the pre-application discussions have confirmed that a formal area of play and formal sports area is not provided on site in light of the existing facilities on the opposite side of Station Road. We would also refer you to the significant Section 106 developer contribution being made through the ‘Canonbury Rise’ (Persimmon Homes) development to this existing play area and sports pitch upgrade. Therefore, contributions from the Redrow proposals will be made via CIL, and through pre application consultation, we have encouraged the Town Council to seek a proportion of that if required to invest in community facilities within the town. **As such, we consider that the development proposal accords with the outlined aspirations for the site. However, we seek an amendment to ensure the policy wording makes it clear as to what is meant by ‘community’ space, given the flexibility of this term, and the position on the**

**ground. We would therefore suggest that the policy text is amended to read as 'informal open space uses, and strategic landscaping along the northern and eastern boundaries with CIL contributions towards off site community uses'.**

#### Policy Criteria

We note reference to detailed policy criteria being developed to highlight specific mitigation measures and infrastructure requirements. However, if it is not clear as to when and where these policy criteria will be published and we would suggest they are not necessary given the non-strategic nature of the site. **Therefore, in light of the application submission and the lack of certainty regarding provision of such policy, we would suggest that reference to detailed policy criteria is removed from the Plan.**

#### Development Brief

PS33 goes on to refer to the need for 'a development brief incorporating an indicative masterplan, to be approved by the District Council'. However, we consider that this is excessive and is surplus to requirement given that the site is relatively small scale and is deliverable within a single phase as outlined in the Design and Access Statement submitted alongside the application. Furthermore, preparation of a development brief is likely to delay the delivery of local development sites. The submission of a full planning application follows detailed pre-application discussions (including design inputs from Stroud District Council) informed by technical and design analysis well beyond that required for a development brief. The submitted application pack confirms that the land uses and infrastructure is tested (including pre-application discussions with statutory consultees) and therefore can be delivered in an integrated and co-ordinated manner. **We therefore seek removal of the requirement for a development brief from proposal PS33.**

#### **Delivery Policy HC3 Self-Building and Custom Building Housing Provision**

We note that Policy CP2 defines the site at Berkeley as a 'local development site' rather than 'strategic development site' and therefore on this basis we assume that delivery Policy HC3 does not apply to site allocation PS33. However we would suggest for clarification purposes that policy HC3 is amended to make specific cross reference to Policy CP2 with regards to the definition of strategic sites that the policy applies to.

#### **Delivery Policy DH7**

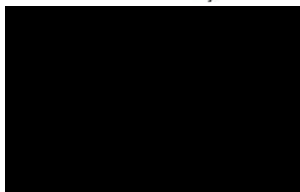
We note the above new policy in relation to open space provision which appears to infer that there is a requirement for green infrastructure including allotments and orchard space to be accommodated on site where possible. The text as drafted does, however, acknowledge that it may be unrealistic or inappropriate for provision within site boundaries for strategic site allocations. However, this does not provide clarification for those non-strategic sites which may trigger such requirements and where it is considered inappropriate to make provision on site. We would also wish to flag concerns with regards to the appropriateness of having small clusters of allotments scattered across the District. **We therefore seek clarification that there should be a spatial strategy to these requirements and, as above, a clear threshold as to when this policy is imposed possibly referring back to the defined strategic sites in policy CP2.**

#### **Summary**

In summary, while we support the allocation of PS33 'Northwest of Berkeley' we make recommendations on clarifying the accompanying policy wording. The aspiration for 120 dwellings is noted, as is the open space provision, however, we encourage the incorporation of flexibility in this respect given the site specific and surrounding area context. We would also underline that the need to submit a development brief and masterplan to the District Council is inappropriate given the scale of the site and the pre-application discussions that have already taken place. Furthermore, we would

assert that the development proposal submitted accords to the core aspirations of the allocation, and the proposed layout attached as **Appendix 1** should be observed when considering the final wording of the allocation.

Yours sincerely



 MRTPI

Director

01179885202

  
For and on behalf of  
GVA Grimley Limited t/a Avison Young

Enc.

**Appendix 1 – Site Layout and Landscape Masterplan  
Representation Form**



Number	House Type	No. of beds	SQFT	
<b>Private</b>				
20	Letchworth	3	984	19680
9	Warwick	3	1081	9729
3	Amberley	3	1137	3411
11	Stratford	4	1218	13398
2	Harlech	4	1300	2600
9	Marlow	4	1346	12114
11	Oxford	4	1318	14498
7	Cambridge	4	1382	9674
3	Canterbury	4	1482	4446
<b>75</b>	<b>Total Private</b>			<b>89550</b>
<b>Affordable - Rental</b>				
2	1B2P GF	1	518	1036
2	1B2P FF	1	564	1128
1	Triym 1	1	606	606
6	1b Apartment	1	510	3060
3	2b Apartment	2	750	2250
1	Fowey	2	780	780
1	Dart	3	1032	1032
16				9892
<b>16</b>	<b>Total Affordable</b>			<b>24958</b>
<b>107</b>	<b>TOTAL</b>			<b>114508</b>
Net Developable Area		acres	7.52	
Coverage (Gross)		hectares	3.05	
			15218 sqft/acre	

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- This drawing is for illustrative purposes only and should not be used for any construction or other purposes. It is subject to planning applications and other conditions of approval. It is not to be used for any other purpose without the written consent of Turley.
- Plans prepared by permission of Oxford Science on behalf of the Council of the Mayor's Advisory Office. © Crown Copyright and Geographical Data. All rights reserved. Ordnance Survey Licence number 100029445.
- Site Boundary
  - 1.8m Close Board Fence
  - 1.8m Brick Screen Wall
  - 2m Wall and Noise Barrier
  - Indicative Hedge Planting
  - Denotes Opposite Handing
  - Affordable Housing Tenure
    - Rented Affordable Housing
    - Shared Ownership Housing



CLIENT: Redrow

PROJECT: Land North West of Berkeley

DRAWING: Planning Layout

PROJECT NUMBER: REDU3009

DRAWING NUMBER: 3000

REVISION: M

DATE: 17/12/2019

CHECKED BY: CD

STATUS: Final

SCALE: 1:500 @ A0

# Stroud District Local Plan Review - Draft Plan - Sites survey

## Your details

Name
[REDACTED]
Your company or organisation
Avison Young
Your email address
[REDACTED]
Client's company or organisation (if applicable)
Redrow Homes Limited
Which cluster do you identify yourself with (i.e. live, work, visit)?
Outside the District

## Site allocations

The Berkeley Cluster - Berkeley PS33 Northwest of Berkeley
Support, subject to changes listed below
<p><b>Comments and suggested changes:</b></p> <p>We hereby submit these representations on behalf of Redrow Homes Limited with regards to their interest at Berkeley which is identified in the Draft plan for Consultation as the potential site allocation PS33. These representations therefore seek to demonstrate that the site PS33 Northwest of Berkeley should continue to be taken forward as a preferred option for growth as it is considered suitable, available and now, deliverable. Context This submission follows our representations in January 2019 and December 2017 respectively (noting GVA now trades as Avison Young) and should therefore be read in conjunction with our earlier comments and detailed technical submissions. These representations will focus predominantly on draft site allocation PS33 within the Stroud Local Plan Review: 'Draft Plan for Consultation'. In addition, it should be noted that these representations follow the recent submission of a full planning application to the Council for the development of 107 dwellings, including 32no.affordable, with associated landscaping, car parking and open space on site allocation PS33. The proposed site layout and landscape masterplan is attached as Appendix 1. We are happy to provide further application details upon request or following registration of the application, the full package will be available to view on the Council's website. We do wish to note however that the application includes a full suite of supporting documents which demonstrate that there are no technical or design constraints which preclude the development from coming forward immediately. We have completed the requisite form with the relevant contact information, but the text of our representation is provided below in the order that the policies appear in the draft document. Site Allocation PS33 Northwest of Berkeley PS33 Northwest of Berkeley states: "Land northwest of Berkeley, as identified on the policies map, is allocated for 120 dwellings and associated community and open space uses and strategic landscaping along the northern and eastern boundaries. Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements. 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 an co-ordinated manner." We support the above site allocation in principle and the broad thrust of the supporting policy text. However in light of the detailed planning application proposals, resulting from a full assessment of the site, we would wish to see the policy reflect the submitted scheme wherever possible. Amount We note that the parcel of land is allocated for 120 dwellings. Following a full suite of technical work and assessment of the site capacity from a design and landscape perspective, the submitted application makes provision of 107 dwellings. As shown on the plans at Appendix 1, we have identified the developable area of the site as the most eastern 'two third' of the site, with public open space provision, and the attenuation basin along the most western boundary. This design arose in response to the existing site conditions and constraints. In light of its identified retention for landscape, the small copse area to the north-western corner of the PS33 allocation, known as 'The Fishers' has been omitted from the development proposal's site location plan, resulting in a reduced site area. In addition to the above, the design of the development proposal seeks to respond to the gradient of the site, sloping downwards from east to west, as well as the flood risk on site, with the western periphery of the site being included within flood zones 2 and 3, while the wider site, including the developable area lies entirely within flood zone 1. Lower density development is also proposed along the edges of the site which overlook the Public Open Space and existing green infrastructure. In light of the above, we would recommend that the wording of the policy be amended to being allocated for 'approximately 110 dwellings'. Use We also note the wording of PS33 refers to the provision of 'associated community and open space uses and strategic landscaping</p>

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Therefore, contributions from the Redrow proposals will be made via CIL, and through pre application consultation, we have encouraged the Town Council to seek a proportion of that if required to invest in community facilities within the town. As such, we consider that the development proposal accords with the outlined aspirations for the site. However, we seek an amendment to ensure the policy wording makes it clear as to what is meant by 'community' space, given the flexibility of this term, and the position on the ground. We would therefore suggest that the policy text is amended to read as 'informal open space uses, and strategic landscaping along the northern and eastern boundaries with CIL contributions towards off site community uses'. Policy Criteria We note reference to detailed policy criteria being developed to highlight specific mitigation measures and infrastructure requirements. However, if it is not clear as to when and where these policy criteria will be published and we would suggest they are not necessary given the non-strategic nature of the site. Therefore, in light of the application submission and the lack of certainty regarding provision of such policy, we would suggest that reference to detailed policy criteria is removed from the Plan. Development Brief PS33 goes onto refer to the need for 'a development brief incorporating an indicative masterplan, to be approved by the District Council'. However, we consider that this is excessive and is surplus to requirement given that the site is relatively small scale and is deliverable within a single phase as outlined in the Design and Access Statement submitted alongside the application. Furthermore, preparation of a development brief is likely to delay the delivery of local development sites. The submission of a full planning application follows detailed pre-application discussions (including design inputs from Stroud District Council) informed by technical and design analysis well beyond that required for a development brief. The submitted application pack confirms that the land uses and infrastructure is tested (including pre-application discussions with statutory consultees) and therefore can be delivered in an integrated and co-ordinated manner. We therefore seek removal of the requirement for a development brief from proposal PS33. Delivery Policy HC3 Self-Building and Custom Building Housing Provision We note that Policy CP2 defines the site at Berkeley as a 'local development site' rather than 'strategic development site' and therefore on this basis we assume that delivery Policy HC3 does not apply to site allocation PS33. However we would suggest for clarification purposes that policy HC3 is amended to make specific cross reference to Policy CP2 with regards to the definition of strategic sites that the policy applies to. Delivery Policy DH7 We note the above new policy in relation to open space provision which appears to infer that there is a requirement for green infrastructure including allotments and orchard space to be accommodated on site where possible. The text as drafted does, however, acknowledge that it may be unrealistic or inappropriate for provision within site boundaries for strategic site allocations. However, this does not provide clarification for those non-strategic sites which may trigger such requirements and where it is considered inappropriate to make provision on site. We would also wish to flag concerns with regards to the appropriateness of having small clusters of allotments scattered across the District. 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Furthermore, we would assert that the development proposal submitted accords to the core aspirations of the allocation, and the proposed layout attached as Appendix 1 should be observed when considering the final wording of the allocation.