

Draft Local Plan - Additional housing options consultation

Your details

Name
██████████
Your company or organisation
Avison Young
Your email address
████████████████████
Client's company or organisation (if applicable)
Redrow Homes Limited
Which area/cluster of parishes do you identify yourself with (i.e. live, work, visit)?
Berkeley (Parishes of Berkeley, Ham & Stone, Alkington, Hamfallow, Hinton, Slimbridge)

Spatial Options: additional housing land

Qu.1b Would you support or object to Option B - "Towns and villages", if additional housing land is required?
Support
<p>Please explain your answer</p> <p>We support Option B which looks for further housing sites at smaller Tier 2 towns and Tier 3 larger villages in the District. This route would ensure balanced growth across the District, while respecting the existing settlement hierarchy by supporting the sustainable growth of larger settlements, rather than impacting smaller settlements in the District. This also would enhance the viability and vitality of these locations and would provide a better range and mix of allocations likely to provide a more consistent housing land supply throughout the plan period.</p>
Qu.1e Would you support or object to a hybrid or combination of options?
Support (Please answer Qu. 2 to explain which hybrid/combination of options you would support)

Spatial Options: a reserve housing supply

Qu.3 Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

Yes

We note that the document acknowledges the unpredictability of housing delivery. We would echo this notion and draw your attention to the recently published 'Housing Delivery Test' results for the 2016-2019 period published by the Ministry of Housing, Communities and Local Government (MHCLG). Under this test, 20 local authorities housing delivery dropped to 85% and substantially below their targets. While we note that Stroud District Council wasn't one of these authorities, this still underlines the precarious nature of housing delivery. The challenges of Covid-19 and the possible planning reforms proposed pose additional hurdles for Local Authorities to overcome with regards to housing delivery also. In light of the above, we would support the principle of a 'reserve housing supply' but would not want additional allocations to potentially preclude more suitable windfall sites coming forward for the development in the future.

Qu.4b Would you support or object to Option B - "Towns and villages", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site).

Support

Additional housing options - Potential sites

Qu.7a Do you support or object to the development of a site identified at: (BER016) Hook Street Farm, Lynch Road, Berkeley?

Object

Please explain.

The Additional Housing Options document identifies BER016 Hook Street Farm, Lynch Road and BER017 Bevans Hill Farm, Lynch Road as new potential sites for allocation. However, we note that in total, the allocations' capacity appears to be 60 dwellings combined which is relatively meagre when you consider the challenges that face the District with regards to deliverability, particularly in the short-term, and the potential increase in housing requirement as a result of a new standard method being adopted. Beyond this, it is considered that BER016 is particularly constrained by flood risk on the eastern side with a large extent of the site area being within Flood Zone 3 and therefore at high risk of flooding. A map of the surrounding flood risk is attached as Appendix 2. The NPPF makes it clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. While we note that this area does benefit from flood defences, this does not eliminate the 'residual risk' of flooding in the event that the flood defence is breached. The NPPG states that areas behind flood defences are at particular risk from rapid onset of fast-flowing and deep-water flooding, with little or no warning if defences are overtopped or breached. Such a constraint could potentially limit the developable area of the site, as well as impacting the deliverability of housing development coming forward. We would also outline that the development of these parcels would drastically alter the landscape to the west of Berkeley as well as the outlooks and amenity access of existing residents. We consider that schemes on these sites would have to be designed sympathetically to the landscape and incorporate a large amount of open space and landscaping, which will again limit the quantum of development on site. In light of the above, we oppose the proposed allocations and consider that more appropriate windfall sites may come forward for development.

Qu.7b Do you support or object to the development of a site identified at: (BER017) Bevans Hill Farm, Lynch Road, Berkeley?

Object

Please explain.

The Additional Housing Options document identifies BER016 Hook Street Farm, Lynch Road and BER017 Bevans Hill Farm, Lynch Road as new potential sites for allocation. However, we note that in total, the allocations' capacity appears to be 60 dwellings combined which is relatively meagre when you consider the challenges that face the District with regards to deliverability, particularly in the short-term, and the potential increase in housing requirement as a result of a new standard method being adopted.

Beyond this, it is considered that BER016 is particularly constrained by flood risk on the eastern side with a large extent of the site area being within Flood Zone 3 and therefore at high risk of flooding. A map of the surrounding flood risk is attached as Appendix 2. The NPPF makes it clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.

While we note that this area does benefit from flood defences, this does not eliminate the 'residual risk' of flooding in the event that the flood defence is breached. The NPPG states that areas behind flood defences are at particular risk from rapid onset of fast-flowing and deep-water flooding, with little or no warning if defences are overtopped or breached. Such a constraint could potentially limit the developable area of the site, as well as impacting the deliverability of housing development coming forward.

We would also outline that the development of these parcels would drastically alter the landscape to the west of Berkeley as well as the outlooks and amenity access of existing residents. We consider that schemes on these sites would have to be designed sympathetically to the landscape and incorporate a large amount of open space and landscaping, which will again limit the quantum of development on site.

In light of the above, we oppose the proposed allocations and consider that more appropriate windfall sites may come forward for development.

File uploads Please upload any maps, supporting information or completed Site Submission forms here. Allowed file types include PDF, jpg, jpeg, doc, docx, xls,xlsx

- File: AY Berkeley representations Dec 2020 v3.pdf