

Our Ref: 07B711090

Your Ref:

9 November 2020

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UBIssued via email local.plan@stroud.gov.uk

Dear Sir / Madam

Stroud District Local Plan Review – Additional Housing Options Consultation (October-December 2020)**Representations submitted on behalf of Redrow Homes Limited with specific reference to the merits of the proposed allocation of land Northwest of Berkeley (Site PS33) over additional options BER016 & BER017.**

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 seek to respond to the recently published 'Additional Housing Options' with regards to Stroud's spatial strategy and the additional Berkeley Cluster sites identified within the document.

We have completed the requisite form with the relevant contact information, but the text of our representation is also provided below for clarity.

Context

This submission follows on from our representations in January 2020, January 2019 and December 2017 respectively (noting that GVA now trades as Avison Young) and should therefore be read in conjunction with our earlier comments and detailed technical submissions.

It should be noted that there is currently a live full planning application on site, under planning ref. S.20/0100/FUL for:

'Proposed residential development with associated infrastructure, site access and highways works, landscaping and open space.'

This application is in the latter stages of determination and we are working positively and proactively with the Council towards a decision within the next couple of months.

The proposed site layout and landscape masterplan is attached as **Appendix 1** for reference; however, full details of the proposed development can be viewed on SDC's planning portal under planning application ref. S.20/0100/FUL for completeness.

Spatial Options & Reserve Housing Supply

We note that the document refers to four possible options to incorporate the additional housing land required:

- A) Intensify
- B) Towns and villages
- C) Additional growth point
- D) Wider dispersal

, 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.

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.

BER016 & BER017

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.

PS33 Land North-West of Berkeley

Draft Allocation

Draft Site Allocation 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 consider that the development proposals (ref. S.20/0100/FUL) clearly respond to the above draft allocation aspirations for the site (ref. PS33).

With regards to the quantum of development, application ref. S.20/0100/FUL proposes of 107 dwellings. While we note this is short of the draft allocation, we would outline that the application has been accompanied by a full suite of technical and design work to determine the developable area of the site and to create a high-quality residential scheme. The site includes constraints such as gradient (sloping downwards from east to west) and flood risk on its western-most limits (zones 2 and 3) which limit the achievable housing provision on site. Moreover, the proposed development seeks to retain the existing copse in the north-western corner of the site, as well as providing a significant open space provision and attenuation on the western third of the site. As such, we consider that the proposed quantum of development responds to the constraints on site, provides the most sympathetic design response to the context and yet still delivers a valuable contribution towards the Districts identified housing need, including affordable housing.

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.

Settlement Pattern

We consider that 'Site PS33' is well-related to the established settlement limits of boundary, extending northwards from the existing Forest View Road dwellings. As outlined above, the western portion of the site is also proposed to be retained for open space provision and attenuation and therefore will be open in character, further respected the western limits of Berkeley.

Flood Risk

With regards to flood risk, as noted above, only the western periphery of the site (ref. PS33) is within flood zone 2/3 and appropriate mitigation measures via provision of attenuation ponds have been incorporated within the development proposals (ref. S.20/0100/FUL) on site. The majority of the site is within flood zone 1 and therefore at low risk of flooding. Contrastingly, as outlined above, much of the land beyond the Berkeley settlement boundary to the south-west is within flood zone 3 and therefore at high risk of flooding.

With regards to the Planning White Paper proposals, we note that the areas at flood risk surrounding Berkeley would likely be designated as '*protection areas*' and would therefore not benefit from any planning '*fast-track*' via the proposed 'growth' or 'renewal' areas. As such, development on these sites would be beholden to standard application negotiations and therefore would likely not come forward for development for a significant time.

Deliverability

As outlined above, housing delivery can be impacted by a myriad of factors and in light of the Covid-19 crisis in particular, the importance of 'shovel-ready' development proposals cannot be discounted, particularly in the short-term.

The site's (PS33) appropriateness for development has been established through draft allocation via the Local Plan Review, where the site has been chosen out of a number of sites put forward. Its deliverability has also been clearly demonstrated via a suite of technical documents/drawings at the application stage (ref. S.20/0100/FUL) with the scheme being near determination.

While we have discussed the District's need for housing generally, we should also emphasise that there is a need for Councils to ensure that they include a wide range of types and sizes of sites in their land supply. The Council's considerable affordable housing need is identified within the adopted local plan. The development proposals offer a policy compliant proportion of new affordable homes to contribute to the District's shortfall.

We consider that this site (subject to application ref. S.20/0100/FUL) would provide an excellent opportunity for a substantial short-term housing delivery, with a policy compliant provision of affordable housing. Moreover, it should be reiterated that Redrow Homes are experienced developers, who have delivered a number of high quality and sustainable schemes within the District and are in the position to begin on site in Q1 2021 subject to planning approval.

Summary

In summary, these representations have sought to respond to the proposed spatial strategy put forward in the Additional Housing Options Consultation 2020, as well as the potential sites in the Berkeley Cluster. It goes onto reiterate that the site (subject to application ref. S.20/0100/FUL) presents a clear opportunity for development. Its appropriateness has been established through



policy (via the draft local plan) and at the application stage via a suite of technical and design documents, and it can deliver short-term housing delivery which is vital when considering the implications of covid-19 and the potential adoption of planning reforms on housing delivery.

Yours sincerely



For and on behalf of Avison Young (UK) Limited

Appendix 1- Proposed site layout and landscape masterplan



Number	House Type	No. of beds	Area (sqft)	Area (sqm)	Total Area (sqft)
Private					
16	Letchworth	3	984	91	15744
7	Warwick	3	1061	100	7567
4	Amberley	3	1137	106	4548
11	Stratford	4	1218	113	13398
15	Marlow	4	1289	120	19335
10	Oxford	4	1318	122	13180
10	Cambridge	4	1394	130	13940
2	Canterbury	4	1482	138	2964
75	Total Private				90676
Affordable - Rental					
6	1b Apartment	1	510	47	3060
3	2b Apartment	2	750	70	2250
3	Tavy	2	832	77	2496
2	Dart	3	1032	96	2064
2	Chew	4	1209	112	2418
16					12288
Affordable - Shared Ownership					
2	Leadon GF	1	518	48	1036
2	Leodon FF	1	564	52	1128
8	Tavy	2	832	77	6656
4	Dart	3	1032	96	4128
16					11912
32	Total Affordable				24200
107	TOTAL				114876
Net Developable Area	acres		7.52		
	hectares		3.05		
Coverage (Gross)			15267	sqft/acre	

- Copyright of Turley
- This drawing is for illustrative purposes only and should not be used for any other purpose. No liability or responsibility is assumed for any errors or omissions. All dimensions and quantities are approximate and subject to change without notice.
- Plans prepared by permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. All Crown Copyright and Database Right (2010). All rights reserved. Ordnance Survey license number 100019241.
- Site Boundary
 - 1.8m Close Board Fence
 - 1.8m Brick Screen Wall
 - 2m Wall and Noise Barrier
 - Hit and Miss Fence
 - Low Knee Rail
 - Indicative Hedge Planting
 - Rear Access Gate
 - Refuse Storage Area
 - Cycle Shed
 - Bin Collection Point
 - Denotes Opposite Handing
 - Rented Affordable Housing
 - Shared Ownership Housing

CLIENT: Redrow

PROJECT: Land North West of Berkeley

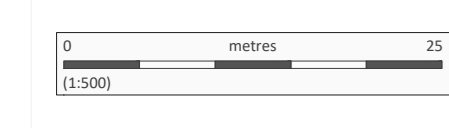
DRAWING: Planning Layout - Re-Submission

PROJECT NUMBER: REDU3009

DRAWING NUMBER: 3002 CHECKED BY: CD/IB

REVISION: G STATUS: Submission

DATE: 06/10/2020 SCALE: 1:500 @ A0



Appendix 2 – Berkeley Flood Risk



Flood map for planning

Your reference
Berkeley

Location (easting/northing)
368326/199887

Created
9 Nov 2020 13:54

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

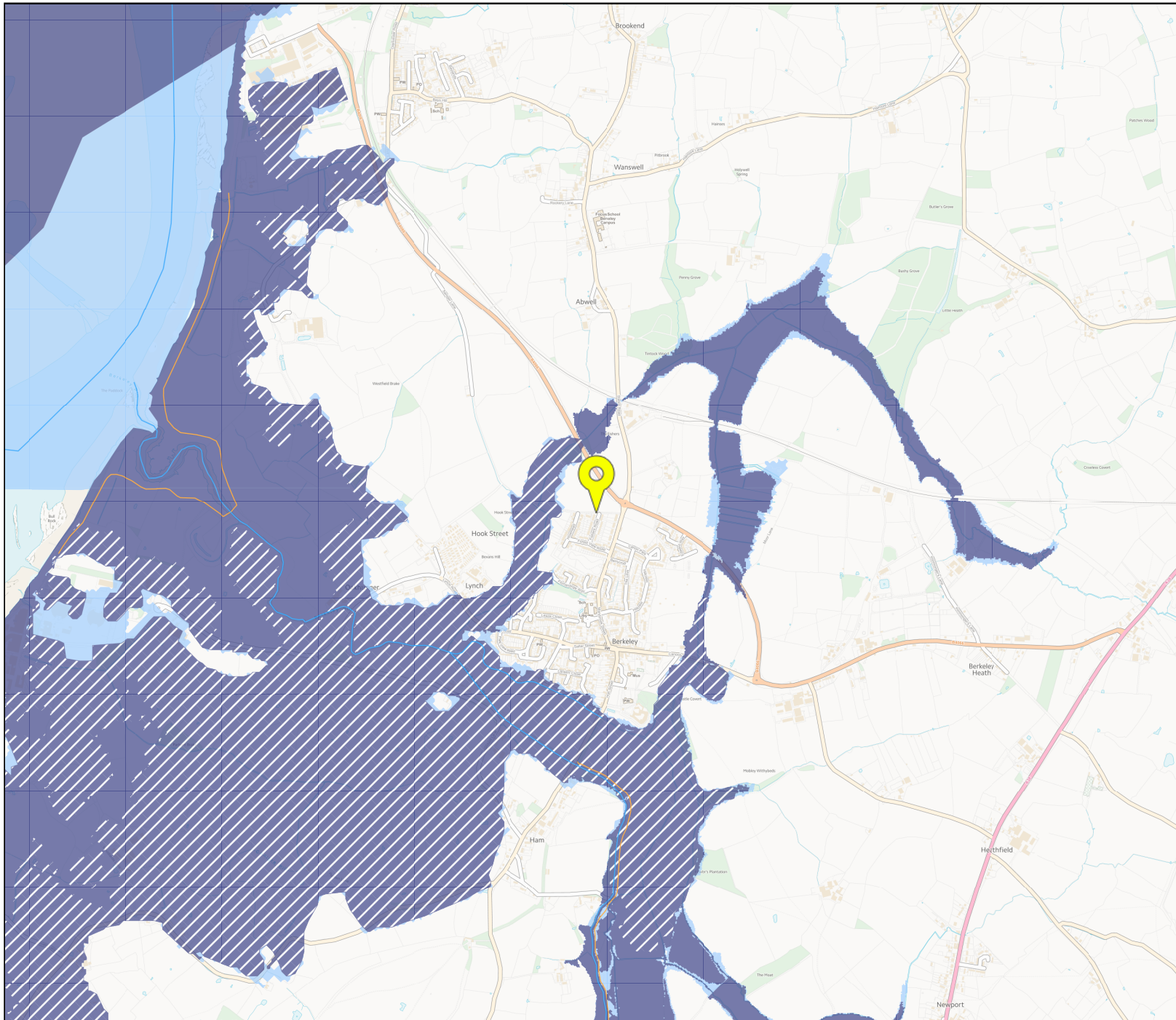
- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

The Open Government Licence sets out the terms and conditions for using government data.
<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>











Flood map for planning

Your reference
Berkeley

Location (easting/northing)
368326/199887

Scale
1:25000

Created
9 Nov 2020 13:54

-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

