



Our Ref: Ref
Your Ref: Ref

17 January 2019

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

Issued via email local.plan@stroud.gov.uk

Dear Sir / Madam

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

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

These submissions follow our representations made in response to the previous Issues and Options Consultation in Autumn 2017 and should therefore be read in conjunction with our earlier comments.

We have previously provided details of the full suite of technical survey work undertaken on the site to date to support a future planning application. The survey findings have demonstrated that there are no technical reasons which would preclude the development from coming forward. We have prepared a formal pre application submission which is being submitted in parallel to these representations. The covering document of this submission is attached at **appendix 1** which includes an indicative master plan for the site. We have not provided the full suite of technical documents which have been submitted with the pre application submission but these can of course be provided should the Planning Strategy Team wish to view them.

The text of our representations is set out below in response to the relevant questions as set out within the consultation document.

4.2 Emerging Growth Strategy

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

We support the emerging strategy with regards to the modest levels of growth proposed at local service centres including Berkeley. Not only are these appropriate for supporting and improving the existing services and

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facilities of these settlements, these allocations can be relied upon for delivery within the short to medium term given their scale and not being reliant on strategic infrastructure provision. We have previously noted that it is appropriate for development at sustainable tier 2 town locations such as Berkeley which provide an important service role for their wider hinterland. Without appropriate growth these market towns may experience a disproportionate aging population, given the lack of housing opportunities to allow families and young people to stay in the Town, which can lead to the loss of services (as Berkeley has experienced).

Question 4.2b Do you support an alternative strategy approach?

We would not support a change to the proposed allocations at service centres such as Berkeley.

Question 4.2c Have we identified the right towns and villages for growth? Or do other settlements have growth potential?

Yes we support the proposed allocation at Berkeley.

Question 4.2d Do you support our approach to addressing Gloucester's housing needs?

Redrow supports the recognition that an assessment of meeting some of Gloucester's housing need within Stroud is required and given Redrow's interests south of Gloucester at Hardwicke, Redrow will be keen to be involved in the assessment of such options and will continue to meet with Stroud DC to discuss this growth option.

4.4 Settlement Boundaries

Question 4.4f Do you support any other changes to settlement development limits, not listed in Appendix A? Please specify.

We would expect the Berkeley Settlement limit to be extended to include the proposed site allocation PS33. It is not clear at this stage within the document as to the Council's intentions to review the settlement limits to correspond with the proposed allocations.

5.0 Making Places

Question 5.0a Do you support the proposed mini-visions for your area(s)? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).

In response to the draft vision for the Berkeley Cluster we do have concerns at this stage with regards to the deliverability of the vision for new communities at Sharpness and Wisloe Green given the significant identified planning constraints that exist, especially in Sharpness noting that the previously allocated development around the Docks has still not commenced.

Question 5.0b Would you like to propose alternative wording for any of the mini-visions? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).

In response to the Berkeley Cluster (p79+) we would note that the second paragraph should be amended to recognise that Berkeley is to be bolstered by 'modest' rather than 'small' scale growth in order to align with the wording used within para 4 of section 4.2 - The Emerging Growth Strategy.

Question 5.0c Do you support the identified key issues and priorities for action for your area(s)? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).

Question 5.0d Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).

Yes we agree with the listed key issues and priorities for the Berkeley Cluster, especially the recognition of ensuring adequate provision of affordable housing and housing opportunities for younger people. We would suggest the additional reference of 'younger people and families' to this point.

Question 5.1a Assuming some growth is desirable, have we identified the best site(s) at each town and village? (Please clearly specify which settlement(s) your comment(s) relate to, and use the site reference numbers shown on the map, where relevant).

Yes we agree with the allocation of PS33 at Northwest Berkeley. Our previous representations and supplementary submissions have demonstrated that the site is the only available option of those identified by the Council around the settlement to deliver the required modest level of growth. The site is in control of a national house builder and a full suite of technical and design documents have now been prepared to facilitate an application which demonstrates there are no technical constraints which would preclude the site from coming forward. The work to date has demonstrated a net developable area of approximately 9 acres which assuming an average density of 15 dwellings per acre equates to a scheme of upto circa 130 dwellings.

Alternative Sites in Berkeley

To reiterate our previous representations we note that the Plan (page 80) indicates alternative potential locations at **BER005** on Fitzhardinge Way and **BER011** on Station Road and two small sites **BER008** and **BER012**. We would note that BER011 is in the same ownership as PS33, and PS33 should be considered ahead of site BER011 as it is a deliverable, developer controlled site which relates better to the existing urban fabric of the town. We would suggest that this would be the logical approach in any case given the closer proximity of PS33 to the town centre and being adjacent to the existing settlement boundary.

We would note that BER005 falls under a different ownership and the development of this site could be reliant on access through site PS33, which is also across an existing right of way. We are also aware of potential third party land ownership issues with regards to a means of access from Fitzhardinge Way into BER005. Also it appears that some of the land comprised within BER005 has been sold to third parties which means the site's development potential / yield would be curtailed. Furthermore we note that any potential access from Fitzhardinge Way would have to be established across land in flood zone 2 or 3 which increases risk of delivery. Sequentially PS33 provides a better, more deliverable option for access of BER005. It should be noted that there is no agreement in place to provide such a means of access from PS33.

Therefore in summary we note that BER008 and BER012 are too small and the other two alternative sites BER005 and BER011 are not available for development at this stage so site PS33 represents the best sustainable and deliverable opportunity to provide appropriate modest growth for Berkeley. The site is located within walking distance to the town centre (served by existing pavements), and is even closer to the local primary school, library and health centre on Station Road. The site also sits opposite the sports pitches, youth centre and play area at Canon Park and on the Station Road bus route with stops on Station Road.

Newtown and Sharpness

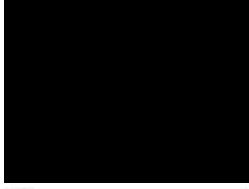
We are concerned with regards to the scale and deliverability of the strategic allocations at Newtown and Sharpness and we would note the potential risk of coalescence of the southern boundary of site PS36 with the potential new edge of Berkeley created by site PS33.

Summary

We hope that these representations are self-explanatory but please do not hesitate to contact me for any further clarification. We will continue to monitor the progress of the emerging plan in parallel

to the application process now underway with Stroud DC's Development Management team starting with the formal pre application submission (attached at **Appendix 1**).

Yours sincerely



For and on behalf of GVA Grimley Limited

Enc. Appendix 1 - Pre Application Submission (minus technical appendices)



Pre-Application Planning Statement

Land North West of Berkeley, Stroud

January 2019

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Appendix II	Emerging Framework Plan by The Richards Partnership (December 2018)
Appendix III	Transport Assessment by Vectos (June 2018)
Appendix IV	Flood Risk and Drainage Strategy Note by JNP (June 2018) and Modelling Information with EA response (October 2018)
Appendix V	Desk Study and Ground Investigation Report by T&P Regen (May 2018)
Appendix VI	Written Scheme of Investigation for an Archaeological Evaluation by Cotswold Archaeology (May 2018)
Appendix VII	An archaeological magnetometer survey by Substrata (April 2018)
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Appendix IX	Preliminary Landscape and Visual Findings by the Richards Partnership (June 2018)
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Appendix XIII	Ecological Assessment by Tyler Grange (Dec 2018)
Appendix XIV	Preliminary Arboricultural Report and Tree Survey and Schedule by Barton Hyatt (June 2018)
Appendix XV	Lighting Impact Assessment by RSK (July 2018)

Prepared By: Emma Norman, Graduate and Pete Stockall MRTPI, Director

Status: FINAL

Draft Date: January 2019

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 This Pre-Application Statement has been prepared by GVA on behalf of Redrow Homes in support of a request for pre-application advice to inform an outline planning application for the construction of up to approximately 120 dwellings, with associated access, parking and landscaping at land North West of Berkeley, Gloucestershire. A site location plan is appended to this statement illustrating the location of the site (**Appendix I**) and the site being identified in the emerging Local Plan Review (November 2018) as a site with development potential under reference PS33.
- 1.2 This report provides a brief overview of; the site and its surrounds; the development proposals; their performance against adopted and emerging National and Local Planning Policies; details of early engagement with stakeholders; and key technical and design considerations that have informed the scheme we are seeking pre application advice upon (see **Appendices II to XV**).
- 1.3 The following information is submitted to inform this Pre-application submission and to demonstrate the extent of technical survey work undertaken to date. We note that some of these are in draft or have missing sections at this stage as they will be finalised for any future planning application submission:
- Emerging Framework Plan by The Richards Partnership (December 2018) Sketch
 - Transport Assessment by Vectos (June 2018)
 - Flood Risk and Drainage Strategy Note by JNP (June 2018) and Modelling Information with EA response (October 2018)
 - Desk Study and Ground Investigation Report by T&P Regen (May 2018)
 - Written Scheme of Investigation for an Archaeological Evaluation by Cotswold Archaeology (May 2018)
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- Ecology Opportunities and Constraints Plan by Tyler Grange (June 2018) following engagement with Council ecologist.
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2. Site Context and Location

- 2.1 The site lies to the south of the B4066 and to the west of Station Road and is located to the north west of Berkeley adjoining the existing residential development to the south beyond a public right of way. The site covers 6.5 hectares and is currently in managed agricultural use. The parcel is triangular in shape, sloping downwards from east to west, and is bound by hedgerows along its perimeters. The tree survey carried out on site identifies trees being limited to the site perimeters and a small copse area known as 'The Fishers' which fall outside of the proposed developable area.
- 2.2 The eastern periphery of the site includes flood zones 2 and 3, however the wider site including the developable area lies entirely within flood zone 1.
- 2.3 There are no listed buildings on the site itself, with no historic assets lying within immediate proximity of the site although Grade II listed 'Wickselm' is located over 262 metres to the north east. The Berkeley Conservation Area does not extend to the site, and lies further to the south.
- 2.4 According to Stroud District Council's online Historic Planning application search, the site has no previous planning history.
- 2.5 In light of Stroud District Council's Local Plan Review, GVA submitted representations on behalf of Redrow Homes to promote the site for development, the site being referenced as 'BER B' in Stroud District's Issues and Options Consultation Document dated November 2017 and most recently site PS33 in the Local Plan Review Emerging Strategy Paper dated November 2018. The site also falls within close proximity to the strategic growth options proposed within the emerging Local Plan Review around Sharpness and Newtown, notably site PS36 to the northwest. Further details in relation to representation submitted are explored in greater detail in chapter 4.

Early Engagement with Stroud District Council

- 2.6 Redrow Homes, along with GVA attended a meeting with Mark Russell of the Planning Policy Team at Stroud District Council on the 8th of March 2018. The following was noted in the meeting:
- Established that the site is available for delivery within 0-5 years within a current tier two settlement;
 - Improvements would be required to appropriately upgrade highways infrastructure on creation of access to the site. Access from the bypass rather than roundabout would be sensible;
 - Established that some technical work/surveys had already been undertaken, with other works instructed;
 - Noted flood zone 3 to the north and west, avoid development on this area of the site.

- Site BER B (site identity in November 2017 Local Plan Review document) identified as deliverable and logical option for housing if Plan is to consider growth of Berkeley.

Early Engagement

2.7 Conversation PR has been instructed to prepare an engagement strategy for the proposals which will be enacted in the lead up to an application submission. This will include liaison with the Town Council, Ward and District Councillors, County Councillors and the local community and stakeholders. Initial research has identified potential local issues within the Town being a perception of poor bus services and bus stop facilities, a reduction in local GPs working locally and lack of affordable housing. In light of GVA's involvement with the Persimmon/Charles Church development scheme to the East of Berkeley we are well versed with regards to the local issues of concern and a number of the key stakeholders.

3. Development Proposals

- 3.1 The submission seeks formal pre-application advice for the development of up to approximately 120 dwellings with associated landscaping, car parking, and open space. The application is to be submitted in outline with details of the access to be provided.
- 3.2 The enclosed site masterplan framework demonstrates that the site will be accessed by road off the B4066. Access by foot will be created off Station Road and to promote permeability of the site; the existing Public Right of Way (PRoW) to the south of the site will remain unchanged, with new links created from this PRoW into the proposed development site.
- 3.3 The dwellings themselves would be built in the most eastern 'two thirds' of the site itself, with public open space provision, and the attenuation basin along the most western boundary of the site. The dwellings would be 'stepped back' from the B4066, with a new 10 metre landscape buffer being created between the proposed dwellings and the road itself. The proposed Emerging Framework Plan shows a net developable area of 3.15 hectares which is 47% of the overall 6.69 hectare site.
- 3.4 A 'Green Gateway' and Local Area of Play (LAP) will be created at the most easterly point of the site; and connected through a new pedestrian/cycle link from Station Road, into the development site.
- 3.5 New Woodland Planting will be introduced along the western boundary of the site; the new 'public open space' will incorporate some of the existing vegetation and trees on site, beside existing 'The Fishers' copse located in the north western corner of the site.
- 3.6 Car Parking will be provided in accordance with Local Planning Policy requirements.

4. Planning Policy Context

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Such material considerations include not only local conditions, but also national policy on relevant issues.
- 4.2 We understand the Development Plan for Stroud District Council comprises the adopted Stroud District Local Plan (November 2015), other relevant material considerations include adopted Supplementary Planning Documents as well as the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).
- 4.3 In terms of emerging policy we note that Stroud District Council is currently in the process of reviewing its Local Plan; an initial Issues and Options consultation took place during autumn 2017, and we note the further public consultation on the Local Plan Review Emerging Strategy is currently taking place until the 18th of January 2019. The indicative programme for the following stages appear to anticipate a pre-submission consultation will take place in Autumn 2020, with adoption taking place in Winter 2021/2022.
- 4.4 We have reviewed the relevant adopted and emerging policies and these are noted below and further referenced in Chapter 5.

Stroud District Local Plan

Stroud District Local Plan (November 2015)

- 4.5 Stroud District Local Plan was adopted in November 2015 and provides a policy framework for the district up to the period of 2031. The proposed development has been designed with the following policies in mind:
- **CP1 Presumption in Favour of Sustainable Development'**- When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
 - **CP2 'Strategic Growth and Development Locations'**- Stroud District will accommodate at least 11,400 additional dwellings for the period 2006-2031.
 - **CP3 'Settlement Hierarchy'**- Proposals for new development should be located in accordance with the District's settlement hierarchy Berkeley, as a 'Second Tier' 'Local Service Centre', can support sustainable patterns of living in the District 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 self-containment and viable, sustainable communities.

- **CP4 'Place Making'**- new Development should integrate with existing neighbourhood, considering connectivity, local character, and the creation of safe streets and places.
- **CP6 'Infrastructure and Developer Contributions'**- The Council will work with partners to ensure that infrastructure will be in place at the right time to meet the needs of the District and to support the development strategy.
- **CP7 'Lifetime Communities'**- To ensure that new housing development contributes to the provision of sustainable and inclusive communities (including the provision of community facilities) in the District, developers will need to clearly demonstrate how major housing development will contribute to meeting identified long term needs in those communities the development relates to
- **CP8 'New Housing Development'**- New housing development must be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing, to create mixed communities.
- **CP9 'Affordable Housing'**- All residential proposals of at least 4 dwellings (net) or capable of providing 4 dwellings (net) covering a net site area of at least 0.16 ha will provide at least 30% of the net units proposed as affordable dwellings, where viable.
- **CP13 'Demand Management and Sustainable Travel Measures'**- Proposals for major schemes, as defined by the Town and Country Planning (Development Management procedure) (England) Order 2010, will be supported where they: 1. Provide for a variety of forms of transport as alternatives to the car to allow more sustainable choices 2. Improve the existing infrastructure network, including road, rail and bus, facilities for pedestrians and cyclists, including provision for those with reduced mobility, and other users 3. Mitigate any significant adverse effects upon the transport network that arise from the development proposed.
- **CP14 'High Quality Sustainable Development'**- High quality development, which protects, conserves and enhances the built and natural environment, will be supported
- **EI12 'Promoting Transport Choice and Accessibility'**- All development proposals should have full regard to the traffic impact on the local highway network. Major development proposals, or those that are likely to have a significant impact on the local transport network, will be required to submit a Transport Assessment as well as a Travel Plan, to demonstrate that they have fully considered access by all modes of transport.

- **EI13 'Protecting and Extending Our Cycle Routes'** - The Council will encourage proposals that develop and extend our cycle network. Major development should provide new cycle routes within the development and connect to nearby established cycle routes
- **ES1 'Sustainable Construction and Design'**- Sustainable design and construction will be integral to new development in Stroud District. Development must consider the efficient use of materials, consider climate change adaptation, maximise energy efficiently and low carbon energy, and maximise recycling facilities and minimise waste facilities, conserve water resources and minimise vulnerability to flooding.
- **ES2 'Renewable or Low Carbon Energy Generation'**- The Council will support proposals that maximise the generation of energy from renewable or low carbon sources, provided that the installation would not have significant adverse impact (either alone or cumulatively)
- **ES3 'Maintaining Quality of Life within our Environmental Limits'**- Development must not result in an unacceptable level of noise, disturbance, fumes, environmental pollution to water, land and air, increase any risk of flooding on or off site, and must not have a detrimental impact on the highways.
- **ES4 'Water Resources, Quality and Flood Risk'**- Applications will be supported by Flood Risk Assessments where appropriate that demonstrate the development will be safe, not increase flood risk elsewhere, and maximise opportunities to reduce flood risk
- **ES5 'Air Quality'**- Development proposals which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health and well-being, environmental quality and amenity.
- **ES6 'providing for Biodiversity and Geodiversity'**- All new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value (whether or not they have statutory protection) and all legally protected or priority habitats and species.
- **ES8 'Trees, Hedgerows and Woodlands'**- Development should seek where appropriate to enhance and expand the District's tree and woodland resource.
- **ES12 'Better Design of Places'**- New development should be designed to offer flexibility for future needs and uses taking into account demographic and other changes. The Council will expect the improvement of existing buildings to meet changing needs and to sustain the District's housing and commercial building stock.
- **ES14 'Provision of semi-natural and natural green space with new residential development'**- Strategic and major residential development shall be accompanied with

additional accessible natural green space, proportionate to the scale of development. This will be provided to achieve the following target rates:

-Provision of at least 2ha of accessible natural green space per 1,000 populations

-Provision of at least one accessible 20 hectare site within two kilometres of home;

-Provision of one accessible 100 hectare site within five kilometres of home; and

-No person should live more than 300m (or 5 minutes' walk) from their nearest area of natural green space of at least 2 hectares in size.

- **ES15 'Provision of Outdoor Play Space'**- Proposals for new residential development shall provide appropriate public outdoor playing space, to achieve a standard of 2.4ha per 1000 population
- **ES16 'Public Art Contributions'**- Proportionate contributions will be required towards the provision of publicly accessible art and design works from development proposals comprising major residential schemes

Stroud District Local Plan Review (Up to the period of 2031)

- 4.6 The Issues and Options version (Autumn 2017) of the Local Plan Review notes the north west of the town being the 'potential broad locations for housing, employment and/or community facilities'. The Issues and Options paper also discussed potential growth options across the District including a more dispersed approach to include development at settlements such as Berkeley (which the previous adopted plan did not). The document identified three potential locations for development as BER A, B and C. Information provided by GVA and Redrow in response to the consultation and subsequently to the Planning Policy team has demonstrated that the subject site is the only deliverable option of three identified development sites.
- 4.7 Whilst at this stage in the Local Plan Emerging Strategy Review Paper (November 2018) there are no specific policies, the document outlines an emerging strategy to deliver 12,800 additional dwellings and sufficient new employment land to meet needs for the next 20 years. As part of this strategy, and in order to meet wider development needs and to support and improve existing services and facilities at smaller towns and larger villages, modest levels of growth will be delivered at the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick.
- 4.8 Within the Local Plan Review Emerging Strategy Berkeley remains identified as a 'Tier 2' settlement (as per the adopted Local Plan); Tier 2 settlements are noted as "relatively large settlements, some of which have a "strategic" role in terms of providing services or facilities that serve a District-wide or wider-than-local catchment..." and "...all offer a good or excellent level of "local" services and facilities." The document (page 80) notes Berkeley has a strong local retail

role with a very good diverse range of local community services and goods. The subject site is the only identified 'potential site for development' within Berkeley and shown as having potential for up to 120 dwellings under site reference PS33. Alternative sites are also included and these are discussed below within section 5.

Other Material Considerations

National Planning Policy Framework

4.9 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and explains how these should be applied. NPPF2 was published in July 2018. Key policies contained within this document which are considered relevant to the application proposals are set out below:

Presumption in favour of sustainable development

4.10 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development (para 11) which for the purposes of decision-taking means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date , granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Delivering a Sufficient Supply of Homes

4.11 The Framework requires local authorities to boost significantly the supply of housing (Para 59).

4.12 The NPPF highlights the Government's objective to significantly boost the supply of homes and seeks for a sufficient amount and variety of land to come forward where this is needed. The proposals will provide a variety of homes, varying in size.

4.13 Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or

significantly prejudice the ability to meet the identified affordable housing needs of specific groups (para 64).

4.14 Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

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

Promoting Healthy and Safe Communities

4.15 The NPPF promotes the creation of healthy, safe and inclusive places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles (para 91).

Achieving Well-Designed Places

4.16 The NPPF promotes the creation of high quality buildings and places as a key aspect of sustainable development (para 124). To this end planning decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime

and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience (para 127).

National Planning Practice Guidance

- 4.17 The Planning Practice Guidance (PPG) provides additional information to be read alongside the NPPF. This additional guidance has been considered in the design of the proposals; however, further details are not set out within this Statement in order to avoid repetition with the policy set out above.

5. Key Planning Considerations

Emerging Site Allocation

- 5.1 The site in question is identified as site 'PS33' 'Northwest of Berkeley' in the Emerging Strategy document (November 2018) of the Stroud Local Plan; other sites considered through in Berkeley through the Local Plan review include 'BER011', land located to the north of the site, bound by the B4066 and Station Road, and 'BER005'; located to the west of Berkeley Cemetery and Howmead.
- 5.2 Site 'BER011' at present lies disconnected from Berkeley separated from the settlement by the roundabout, B4066 and Station Road. Site 'BER005' has a number of notable constraints; such as restricted access off Fitzhardinge Way and over land located within Flood Zone 2, over 10 different landowners on a relatively small 2.18ha site, and land along the western boundary lying within flood zone 3.

Principle of Development

- 5.3 The site to which this pre-application request relates, 'PS33' has been considered for potential development in Berkeley through Stroud's Local Plan Review. The site was considered at 'Issues and Options' stage, and carried through into the Emerging Options Paper as a site that could contribute towards the district's needs to deliver 12,800 additional dwellings over the next 20 years (as per the emerging Strategy Paper, November 2018).
- 5.4 At present, the site is suitable available, and immediately deliverable. A full suite of technical work and surveys have been undertaken/carried out on site, illustrating Redrow's dedication to delivering housing on site within the near distant future. The technical information is highlighted in greater detail below and the documents prepared to date are submitted in full or as latest working drafts.
- 5.5 Redrow will be in a position to submit a planning application in Spring 2019. We understand that the application will be determined in the context of the adopted Local Plan with limited weight applied to the Emerging Local Plan Review at this stage. However we would suggest the following key factors at this stage should be balanced against any considerations regarding prematurity of bringing the site forward:
- With the exception of falling outside of the settlement boundary (as defined in the adopted Local Plan) there does not appear to be any fundamental policy considerations which would preclude development here, especially noting that Berkeley is a tier 2 settlement and identified for modest growth within adopted Local Plan policy CP3.

- The proposals will need to be considered in the context of the appeal decision for the land East of Berkeley (APP/C1625/W/15/3133335) which established that proposals on the edge of Berkeley comprised sustainable development and could be supported even though the scheme also fell outside of the defined settlement boundary and therefore contrary to policy CP2 and CP15. This appeal which was upheld at subsequent judicial review, was post adoption of the Local Plan.
- In addition to the above Berkeley appeal precedent we note that the rationale of accepting 'sustainable' development outside of settlement boundaries has also since been applied by SDC. For example at Cam in the consideration of outline application S.17/1366/OUT (granted 19/12/2018) for upto 90 dwellings we note the application committee report concludes." *The site is located outside the defined settlement boundary for Cam where the proposed development is contrary to the SDLP, however, there are site specific circumstances and material considerations in this case that are considered to outweigh the conflict with the SDLP.... The application site is near The Halt development concluded to be a sustainable location by the Planning Inspector at appeal. The site is located alongside an existing residential development and directly opposite the North East Cam allocated site. Here the proposed development would neither materially impact the countryside nor have a material impact on the setting of Cam. Due to these exceptional circumstances it is difficult to identify what harm development of this site would deliver to the strategic objectives and policies of the Local Plan.....Whilst lack of harm is a neutral matter in considering the planning balance, this, in combination with the established sustainability credentials for the location and the benefits of the provision of affordable housing at policy compliant levels plus railway station parking to relieve pressure on the existing parking facilities are afforded substantial weight that justifies a departure from the SDLP in this instance". We would therefore suggest that the proposals North West of Berkeley demonstrate similar circumstances by virtue of the previous appeal decision establishing development on the edge of Berkeley being considered a sustainable location and in accordance with the wider Local Plan objectives. Furthermore we would also suggest that the subject site has significantly reduced impacts on heritage and landscape features and settings than the appeal site.*
- The only major residential allocation in the Berkeley Cluster (Sharpness Docks) within the adopted Local Plan appears to remain stalled and therefore cannot be relied upon to deliver housing provision in the short to medium term. The proposals North West of Berkeley could contribute towards this provision gap.
- The development North West of Berkeley can be delivered without a requirement for strategic infrastructure
- There are no identified technical or environmental constraints which would preclude the development from coming forward.

- In summary the development is compliant with the NPPF housing growth agenda and the overall aspirations of the adopted and emerging local plan position.

Housing Provision

- 5.6 In considering the future of housing in the District, the emerging Local Plan identifies a need to deliver 638 homes per year for a 20 year period in order to deliver 12,800 homes by 2031; this is a 40% increase from the figure set out in Stroud District Council's current Local Plan of 456 homes per year. The site will provide a valuable contribution towards meeting this significantly increased target for delivery. Affordable Housing is also intended to be provided as part of the development.

Flood Risk

- 5.7 Adopted Local Plan Policy ES4 highlights that applications must be supported by Flood Risk Assessments, and that proposals must not increase the risk of flooding on or off site. JNP Group Consulting Engineers provided a 'Flood Risk and Drainage Summary Note' in June 2018. The summary highlights that Environment Agency fluvial flood mapping (including flood risk from the sea) indicate that the western area of the site to be within Flood Zones 2 & 3 (medium & high risk) associated with the watercourse which forms the western boundary of the site. The remainder of the site is located in Flood Zone 1 (low risk). The extent of Flood Zones 2 & 3 occupies approximately 25% of the site area and development is not proposed within this part of the site.
- 5.8 A surface water drainage strategy has been proposed which is reflected in principle on the Emerging Framework Plan in the form of attenuation basin within the western end of the site which also reflects the topography of the site. The fluvial and coastal flood contours are also mapped. This drainage strategy reflects significant engagement to date with the Environment Agency including modelling input and takes on board their requirements, resulting in the siting and scale of the drainage basin/attenuation features. The summary note also confirms that Wessex Water has confirmed that a foul water connection can be made to the existing network.
- 5.9 The summary note therefore concludes that the proposed development is deemed to meet NPPF requirements for both flood risk and surface water management.

Access and Transport

- 5.10 A Transport Assessment (TA) was undertaken by Vectos in June 2018. The report highlights the site's close proximity to Berkeley town centre. The town centre, located within a ten minute walk of the site offers accessibility to a large number of facilities and amenities, including Berkeley primary school (between the site and town centre), convenience store and health facilities. Canon Park bus stop is located 120 metres from the site. The site will be accessible for cyclists; connections will link through the development to the public right of way to the southern edge of

the site and also directly to Station Road to the East which forms part of the Sustrans National Cycle Network.

- 5.11 New Cycle and Pedestrian access will be created on site (as outlined in chapter 3), promoting sustainable transport and accessibility in line with policy EI12. On the basis of the above, access to sustainable modes of transportation including bus services (with enhanced links to rail links being funded by the development site Land East of Berkeley), walking and cycling offer a realistic opportunity to reduce trips previously made by car. The TA findings also conclude that there are no capacity or safety issues within the existing network which raise concerns with regards to the development proposals. The position and design of the vehicular access into the site from the B4066 has been informed by technical analysis and guidance from Vectos. Full design of the site access junction beyond the preliminary layout will be undertaken to consider the levels difference between the by-pass and site.

Landscape and Open Space

- 5.12 A Preliminary Landscape and Visual Findings report has been prepared by The Richards Partnership. The report study considered the landscape and visual characteristics of the land to the north west of Berkeley so as to inform and guide the development proposals for the site by providing a landscape development strategy. Should an application come forward on this site then this work can inform a formal Landscape and Visual Impact Assessment.
- 5.13 The report concludes that the local landscape to the north, east and west is well vegetated with frequent hedgerows, hedgerow trees and small copses, and mature vegetation along the road and railway corridors. Built form on the adjacent urban edge screens views from the south and the small scale undulating local landscapes further limit views.
- 5.14 Policies ES14 and ES15 note the importance of open space in enhancing quality of life for existing and future residents in places such as Berkeley. Open Space and a Local Area of Play will be incorporated into the scheme's design. Green spaces will form a large part of the site and its character, with the western boundary of the site dedicated to woodland space, planting and 'The Fishers' copse. The site's Trees, Hedges and Vegetation will be enhanced significantly in accordance with policy ES8, reflecting the rural character of Berkeley. We also note that the site is within close proximity to Canon Park on the opposite side of Station Road.

Agricultural Land

- 5.15 An Agricultural Land Classification (ALC) review report was undertaken by Kernon Countryside Consultants Limited in May 2018.
- 5.16 The detailed ALC survey has determined that agricultural land across the Site comprises a mix of Subgrades 3a, 3b and grade 4 quality land. The report states that although the subject site

comprises of some "best and most versatile agricultural land" i.e. 2.8 hectares of Grade 3a, 2.8 hectares was not considered to be a sufficient quantity to be considered significant. We would also note that the alternative site options considered within the Plan Review includes a site to the south which falls entirely within Grade 3a.

- 5.17 Therefore, the report concluded that the development of the site for non-agricultural development is in accordance with policy advice set out in the National Planning Policy Framework.

Ecology

- 5.18 A Phase 1 Ecological Assessment and follow up surveys have been undertaken by Tyler Grange. These include a bat survey undertaken in May 2018 and following discussions with Gloucestershire County Council's Ecologist, further bat surveys were undertaken over the forthcoming months. Further advice recommended badger monitoring along the north-eastern boundary of the site and winter bird surveys. The County ecologist has confirmed surveys for Great Crested Newts (GCN) and dormice were not requested, however a strategy for Great Crested Newts would be required. Therefore should a planning application come forward this will include a full complement of ecological surveys.
- 5.19 The ecology work to date has resulted in a number of mitigation proposals which have been incorporated into the development proposals including a potential badger sett along the north-eastern boundary which may require a 30m buffer and the Fishers copse, which could be used by bats, would ideally be covered by a 10-15m buffer. A 10-15m buffer to extend along the stream/ditch along the western boundary to allow habitat for any GCN that may be present has also been recommended and incorporated.
- 5.20 The project team is also aware of the potential requirement to undertake a Habitat Regulation Assessment (HRA) Screening Assessment in light of the proximity to the River Severn. In order to ensure a completely robust position a wintering bird survey is being undertaken for the site.

Acoustic Assessment

- 5.21 The acoustic work to date has indicated that some mitigation measures will be required with regards to potential traffic noise arising from the B4066. The initial findings conclude that a partially open window typically provides up to 15 dB of attenuation (BS 8233), it is apparent from the noise contour plot that the predicted levels would result in exceedances of the recommended internal ambient acoustic criteria during a situation in which windows are partially open for ventilation purposes. This will generally be the case where the external noise levels within the development areas exceed 50 dB $L_{Aeq,16hr}$ and 45 dB $L_{Aeq,8hr}$, for daytime and night-time periods respectively. To account for this, an appropriate glazing and ventilation strategy would need to be implemented for a number of the proposed residential properties.

- 5.22 The findings also conclude that it is also evident that external amenity areas associated with the proposed dwellings close to the northern boundary will experience noise levels above the upper threshold noise level of 55 dB $L_{Aeq,16hrs}$. Therefore, it will be necessary to introduce appropriate mitigation measures to reduce the noise levels in rear gardens. This would typically take the form of noise barriers or a combination of earthwork bunds and barriers. Furthermore the guidance proposed that the site layout could be improved by amending the orientation of the proposed buildings so that the first line of properties provides effective screening to external amenity areas and other dwellings setback further into the site.
- 5.23 Therefore the above findings will be used to inform the testing layouts for the proposals but the final mitigation measures will be confirmed at reserved matters stage. We would note that the acoustic measures on the land East of Berkeley were limited to building orientation, and limited plot window and garden fencing treatments.

Lighting Assessment

- 5.24 The lighting assessment work to date has concluded that the proposed development will have a negligible impact on the existing residential properties close to the development site. Although light spill from the site will increase in some locations as a result of the development, these are completely insignificant, with the maximum being just 0.02 Lux. The existing street lighting close to these potentially sensitive receptors is significant enough that the impact of the new development will be negligible in these locations.
- 5.25 The assumed luminaires to be installed on the site have little or no light spill due to housings that direct the light down and cut off any unwanted sideways illumination. The proposed landscaping and general layout contribute to the overall performance of the development and combined with the existing hedgerows and trees around the border form a natural barrier that helps to reduce light spill from the site. This results in a development that will have little or negligible impact on the surrounding area in line with the SLL recommendations.
- 5.26 In summary it has been shown that the proposed development will have an insignificant effect on the immediate environment with respect to lighting pollution. Although light spill has increased luminance levels at some locations, the potential increase in luminance is considered negligible.

6. Summary

- 6.1 This Pre-Application Planning Statement provides background on the site and its context, development proposals, and an overview of the planning context within which this application is made. This submission seeks a meeting and written feedback with regards to the potential development of up to 120 dwellings with associated parking and landscaping on land North West of Berkeley.

6.2 We consider that the above proposals reflect the aspirations of the Local Plan, whilst incorporating aspirations of the emerging Local Plan to bring growth to Berkeley, contributing towards the wider growth of the Stroud District, and therefore reflecting the aspirations of the NPPF in significantly boosting the supply of homes (para 59). The Local Plan review has demonstrated a need to deliver an increase of 40% more housing per year in the District over the next 20 years. The supporting technical and design work to date has demonstrated that the site is available, suitable and deliverable for development in the near distant future and on this basis it is appropriate to bring an application forward now for the above mentioned development.

Appendix II

Emerging Framework Plan by The
Richards Partnership (December
2018) Sketch



B4066

PLAY AREA

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NOTION