



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

20th January 2020  
E-MAIL ONLY

Dear Sir/Madam

**Stroud District Local Plan Review, Draft Plan for Consultation November 2019  
Representations on the Draft Plan for Consultation**

**HOOK STREET FARM, LYNCH ROAD, BERKELEY, GL13 9TF**

Rackham Planning has been instructed by Prestige Developments Ltd to submit representations to the Stroud District Local Plan Review, Draft Plan for Consultation, November 2019. This letter accompanies a completed "Policies Survey" and a completed "Other Sections Survey" (submitted on-line via Stroud District Council's website). It sets out representations relating to specific sections and policies of the Stroud District Local Plan Review and is duly submitted within the requisite timeframe (i.e. by 22<sup>nd</sup> January 2020).

Our client identifies with the Berkeley Cluster, owning a 7.3 ha site at Hook Street Farm, Lynch Road, Berkeley, GL13 9TF. The site at Hook Street Farm has been submitted as a potential new site for residential development as part of the Local Plan Review.

For ease of reference, this letter has been structured to accord with the relevant surveys.

**National Planning Policy Framework (NPPF) February 2019**

With regard to Plan Making, the NPPF (**Para 35**) confirms that:

*"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:*

- (a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and informed by agreements with other

- authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- (b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
  - (c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
  - (d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework.*

It is with the above in mind that the following comments are made on the Stroud District Local Plan Review Draft Plan for Consultation.

### **Section 2.3 – An Introduction to the Development Strategy**

**Support** Paragraphs 2.11, 2.15, 2.18 and 2.27

**Paragraph 2.11** states that *“The Draft Local Plan’s development strategy will distribute at least 12,800 additional dwellings and sufficient new employment land to meet needs for the next 20 years”*.

The Government’s aim, as enshrined in the NPPF is to significantly boost the supply of housing. The identification of the need to distribute at least 12,800 additional dwellings over the next 20 years is welcome and consistent with national policy (and is based on Stroud’s objectively assessed need as set out in Gloucestershire Local Housing Needs Assessment Consultation Draft October 2019). It is recognised that this is a 40% increase in the housing requirement compared to the adopted Local Plan (**Para 2.42**). However, it is considered that this should be a minimum and there should be flexibility in establishing land for additional dwellings to ensure flexibility in the Council’s approach and to ensure that the plan is effective (i.e. deliverable over the plan period).

To maintain the supply of housing the Government introduced a Housing Delivery Test (HDT) in July 2018. This is set out in **Para 75** of the NPPF which states that:

*“To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under- delivery and identify actions to increase delivery in future years”*

The first Housing Delivery Test (HDT) results for Stroud, published in February 2019 (Stroud District Housing Action Delivery Plan August 2019) , show an HDT measurement of 94%, based on housing

completions for the three year period from 01 April 2015 to 31 March 2018. This required an Action Plan to reduce the risk of future under- delivery and this was based on the 40% lower housing requirement in the currently adopted Local Plan. The need for the action plan demonstrates the challenge of delivering housing numbers to meet the ongoing housing need which will be enhanced with the significant increase in housing requirement set out in the Draft Local Plan Review.

**Paragraph 2.27** of the Draft Plan acknowledges that *“delivery rates are vulnerable to changes in economic cycles, brownfield sites can be complex and expensive to develop and the creation of new settlements is an ambitious undertaking. We may need to identify additional reserve sites, should the sites identified in this document not come forward at the rates envisaged, and we are interested to hear views on this”*.

We fully **support** the suggestion of identifying additional reserve sites should the identified sites in the Plan not come forward. Identification of reserve sites would help the District meet the Housing Delivery Test and potentially prevent the future need for delivery action plans. In this regard, consideration should be given to allocating reserve sites in the Draft Local Plan Review to boost potential housing delivery and help ensure flexibility in the delivery of the Local Plan requirements.

**Paragraph 2.15** states that *“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”*.

We fully **support** the continued identification of Berkeley as a Tier 2 Local Service Centre and the modest levels of growth encouraged in **Paragraph 2.15** of the Local Plan Review.

Berkeley is recognised in the 'Stroud District Settlement Role and Function Study – Update 2018' as one of the District's large settlements. The case for growth at Berkeley in this document states:

*“Growth should be prioritised towards the District's larger and better-resourced settlements. As one of the District's main towns, Berkeley should be a priority location. However, the town faces significant environmental, physical and topographic constraints, including flood risk, which make significant expansion difficult” (p.82)*

We fully **support** growth at Berkeley and consider that environmental constraints, including flood risk can be suitably addressed whilst still securing potential growth of the town, especially to the west (e.g. the proposed new Hook Street Farm site), where there is land is available, suitable and deliverable for development (This is set out in the New Site Submission Form submitted on behalf of Prestige Developments Ltd).

**Paragraph 2.18** states that *“Some limited development at small and medium- sized sites immediately adjoining settlement development limits at Tier 1-3 settlements will be allowed, to meet specific*

*identified local development needs (i.e. exception sites for first time buyers, self-build and custom build housing, rural exception sites), subject to being able to overcome environmental constraints”.*

We fully **support** the identification of limited development at small and medium sized sites immediately adjoining settlement development limits at Tier 1-3 settlements to meet identified local needs. We specifically support the inclusion of exception sites for first time buyers, self-build and custom build housing sites, as well as rural exception sites adjoining settlement development limits.

In terms of identifying land for homes, **Paragraph 71** of the NPPF identifies that:

*“Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority’s area. These sites should be on land which is not already allocated for housing and should:*

- (a) Comprise of entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of this Framework; and*
- (b) Be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards”.*

The allowance for housing to meet specific needs adjoining settlement boundaries as set out in **Paragraph 2.18** of the Local Plan is consistent with national policy.

**Paragraph 2.49** states that *“Other housing proposals will be supported, in accordance with the Draft Plan’s settlement hierarchy, within settlement development limits and, in specifically defined policy cases, outside of settlement development limits. These additional elements of supply will deliver levels of housing growth above the minimum requirement, providing for flexibility and headroom”.*

We fully **support** the identification of housing proposals outside of settlement development limits in specifically defined policy cases. As discussed above, uncertainties inherent in the development process mean not all sites will be delivered and it is important to recognise opportunities for additional supply in to ensure housing requirements are adequately addressed. As discussed further below, we consider that multiple plot self-build and custom build housing proposals should be included in policy as suitable on exception sites outside of defined settlement limits.

### **Meeting Stroud District Housing Needs up to 2040**

We fully support the following points of the housing strategy set out on page 35 of the Draft Local Plan Review:

- *At least 638 new homes per year for a 20 year period;*

- *A mix of brownfield and greenfield allocated housing sites of varying sizes to ensure delivery is maintained throughout the plan period;*
- *Opportunities to bring forward housing development on brownfield sites through the identification and potential allocation of sites appropriate for housing on the Brownfield Land Register;*
- *Additional affordable homes working with parish councils, co-operatives, community land trusts and community housing groups;*
- *A mix of dwelling types (1 bed, 2 bed, 3 bed, 4+ bed, flats, houses, bungalows, etc.) on Local Plan housing sites, in proportion to identified local needs;*
- *Exception sites for first time buyers and renters, subject to local needs;*
- *Rural exception sites to meet local affordable needs;*
- *Small scale housing in rural areas in the interests of social sustainability, subject to local community support;*
- *Self and custom built homes to meet needs identified on the self and custom built register, through a combination of site allocations, proportionate development on Local Plan housing sites and rural exception sites;*
- *Housing for local people, including where appropriate, using local occupier clauses to ensure local housing needs are met within or adjacent to existing communities.*

**Paragraph 2.48** states that *“Modest housing allocations will also be delivered at the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick and lesser levels of housing will be allocated at the Tier 3a villages of Brimscombe and Thrupp, Frampton-on-Severn, Kings Stanley, Kingswood, Leonard Stanley and Whitminster”*

As discussed above, given the large settlement of Berkeley and the range of local services and facilities on offer, we fully support the identification of modest housing allocations in Berkeley. In addition to the proposed allocation to the north west of Berkeley identified in the Draft Local Plan Review, we consider that a further allocation should be identified to the west of the settlement. This is discussed in further detail in relation to **Policy CP2**.

## **Section 2.9 Core Policies**

### **Core Policy CP2 – Strategic Growth and Development Locations**

We **support** Policy CP2 **subject to** increasing the housing allocation in Berkeley. **Policy CP2** allocates local development sites in Berkeley for up to 120 dwellings. Given the size of Berkeley and opportunities for sustainable growth to the west of the settlement (at Hook Street Farm) which are yet to have been fully explored, we consider that the local development sites in Berkeley should be allocated for approximately 40 dwellings. This would allow flexibility for inclusion of additional housing allocations and provide more flexibility in the delivery of housing to meet identified need.

### **Core Policy CP3 - A hierarchy for growth and development across the District’s settlements**

We **support** the thrust of **Policy CP3** which states that:

*“Proposals for new development should be located in accordance with the District's settlement hierarchy. This will ensure that development reduces the need to travel and promotes sustainable communities, based on the services and facilities that are available in each settlement. The use of previously developed land and buildings within settlements will be given substantial weight”.*

We do, however, also encourage the Council to further recognise and give weight to the use of previously developed land and buildings outside but near settlement boundaries as opportunities to enhance the deliverability of the Draft Plan requirements.

**Policy CP3** identifies the following:

*“Tier 2 - Local Service Centres Berkeley, Minchinhampton, Nailsworth, Painswick, Wotton Under Edge; Hunts Grove (anticipated)*

*These market towns and large villages have the ability to support sustainable patterns of living in the District because of the facilities, services and employment opportunities they each offer. They have the potential to provide for modest levels of jobs and homes, including through sites allocated in this Plan, in order to help sustain and, where necessary, enhance their services and facilities, promoting better levels of self containment and viable, sustainable communities. Further development will be achieved through strategic allocations, development within settlement development limits, town centres and employment sites and (exceptionally) adjacent to settlement development limits, subject to fulfilling the criteria set out in the Plan's Core and Delivery policies.*

We fully **support** the designation of Berkeley as a Tier 2 Local Service Centre and recognition that it has the potential to provide for modest levels of growth both within and (exceptionally) adjacent to settlement development limits. As discussed in more detail below, we consider that inclusion of multiple self-build and custom build houses as ‘exception’ sites suitable for developing adjacent to settlement development limits is important in ensuring a flexible approach to housing delivery in the district.

With regard to Local Service Centres, Figure 3 of Core **Policy CP3** sets out development which is appropriate adjoining Settlement Development Limits (SDLs). It lists these as:

- *Exception sites: 100% affordable housing, including entry-level homes and affordable self-build/custom build homes*
- *Single plots: affordable self-build or custom-build homes*
- *Live-work development*

- *Tourism / leisure development, subject to criteria*

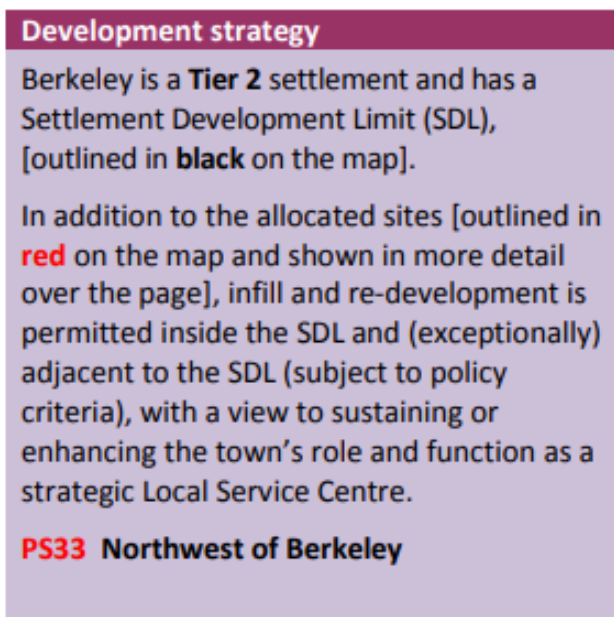
The inclusion of self-build or custom build homes, live-work development and leisure/tourism development adjoining SDLs is welcome and fully supported. However, we also consider that small sites (i.e. multiple plots) for affordable self-build or custom-build homes could be appropriate adjacent to settlement development limits subject to the assessment of impact. We consider that this would help ensure the flexible delivery of housing required in the District and request that additional flexibility is included in **Policy CP3** (Figure 3) to reflect this opportunity.

### **Chapter 3 – Making Places, Shaping the Future of Stroud District**

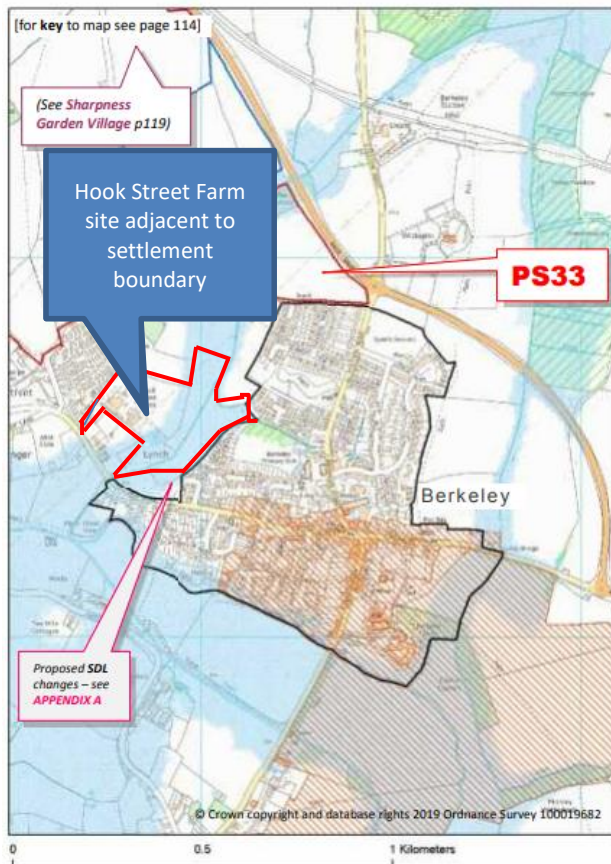
#### **Section 3.5 - The Berkeley Cluster - P.115**

We recognise that the principal physical constraint of Berkeley is the floodplain to the south west and east of the settlement. However, we consider that there are additional opportunities to the west of Berkeley for future development which could incorporate uses which are appropriate on the floodplain immediately to the west of the settlement boundary (i.e. open space/amenity space/nature conservation/community uses) and which could successfully deliver additional housing adjacent to the settlement. The “Landscape Sensitivity” assessment suggests that “*The preferred direction of housing growth in landscape terms is to the north west and west of the settlement*”. Development to the west of the settlement would accord with this desired direction of growth.

The Development Strategy for Berkeley is shown at **images 1 and 2** below:



*Image 1 – Development Strategy for Berkeley (p.115)*



**Image 2 – Development Strategy (Plan) for Berkeley (p.115)**

In addition to the allocated site (P33) to the north of Berkeley, we request that an additional site to the west of Berkeley is included in the Development Strategy (as show in **image 2** above). The proposed additional site for development is subject to a separate site nomination through the Draft Plan Site Submission Form. Allocation of this site for future development would be consistent with the Government’s objective of significantly boosting the supply of housing (para 59 of the NPPF) and would help ensure flexibility in the delivery of the 12,800 additional dwellings required by **Policy CP2**.

**Chapter 4 - Homes and Communities**

**Delivery Policy HC3 - Self-build and custom build housing provision**

The first part of Policy HC3 states that:

*“The Council supports the provision of self build and custom build dwellings within settlement development limits and single plot affordable self build and custom build dwellings adjacent to settlement development limits...”*



We support the inclusion of self-build and custom build dwellings adjacent to settlement boundaries, but consider that **Policy HC3** could be changed to allow multiple plots (rather than just single plots) for affordable self-build and custom build dwellings adjacent to settlement boundaries in sustainable locations (providing any impacts of such development are appropriately assessed and controlled). The inclusion of multiple plots for affordable self-build and custom housing adjacent to settlement boundaries in **Policy HC3** would make a positive contribution to housing supply, will help meet the Government's aspirations to increase self build developments and increase the flexible delivery of the Plan's housing targets.

#### **Policy HC4 – Local housing need (exception sites)**

Delivery Policy HC4 Local housing need (exception sites) states that:

*“Planning permission may be granted for affordable housing, including entry level homes, and single plot self-build or custom build affordable dwellings on sites well related to existing settlements. Such sites should be located close to, or adjoining, an accessible settlement with local facilities (‘Third Tier’) or above in terms of the Plan settlement hierarchy, unless specific local need and environmental considerations indicate that provision should be met at fourth tier settlements...*

*...The Council will consider the inclusion of some market housing on these sites where this is required to make the scheme viable. A high level of proof will be required to ensure that the level of market housing is de minimus, including consideration of whether Government grant availability could reduce or negate the necessity for market housing”*

We **support Policy HC4** and the inclusion of entry level homes, self-build or custom build affordable dwellings on sites well related to existing settlements. However, we request flexibility for including multiple self-build or custom build affordable dwellings as appropriate for inclusion on ‘exception sites’ as a mechanism for further increasing affordable housing delivery which in the past has failed to meet the District's requirement.

The Stroud District Housing Land Availability Residential Commitment in Stroud District at 1<sup>st</sup> April 2019 (April 2019) confirms an annual unadjusted requirement for 446 affordable housing (as per **Policy CP9** (Affordable Housing) of the adopted Local Plan. The report shows the total affordable units provided since April 2016 is 354. This falls well below the annual requirement of 446. The Draft Local Plan Review Requirement **Policy CP9** sets out the future overall unadjusted need for affordable housing as 425 houses per annum. In order to try and achieve the annual affordable housing requirement, it is considered that a more flexible policy on local housing need, which makes provision for example for multiple self-build or custom build plots on sites well related to existing settlements should be included in **Policy HC4**.

We fully **support** the inclusion of some market housing on exception sites as set out in Draft **Policy HC4** where this is required to make a scheme viable. This is consistent with advice in the NPPF (**Paragraph 77**) and could help the District to meet the annual affordable housing requirement .

### **Policy DHC3 – Live-work development**

**Policy DHC3** states that:

*“Live-work development will be supported subject to the following criteria being met:*

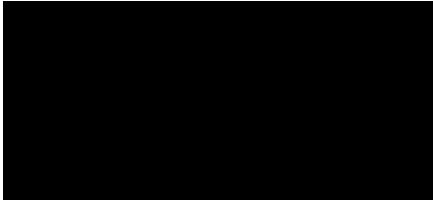
- 1. The site is located within or adjoining settlement development limits and would not result in the loss of part of a key employment site or another existing employment site which is suitable for continued business use;*
- 2. The work element is not ancillary to the dwelling and is physically distinct from the residential accommodation with a separate access;*
- 3. The residential floorspace of the live-work unit shall be occupied only by a person solely or mainly employed, or last employed in the business occupying the business floorspace of that unit, or by a widow or widower of such a person, or any resident dependants;*
- 4. Servicing arrangements should be appropriate to the scale of the use proposed and located so as to minimise impacts on residential accommodation;*
- 5. The residential element should meet the normal standards for housing development;*
- 6. The residential element satisfies the detailed criteria defined for meeting housing need at settlements. The business floorspace of the live-work unit shall be finished ready for occupation before the residential floorspace is occupied and the residential use shall not precede commencement of the business use.*

The inclusion of **Policy DHC3** on Live-work development in the Draft Local Plan Review is fully **supported**. Specifically, the provision for live-work units adjoining settlement development limits at criteria (1) of the Policy is welcome and provides an enhanced opportunity for sustainable development on the edge of existing settlements. The NPPF (**Paragraph 82**) requires planning policies to “...(d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”. The inclusion of a specific policy on live work units is thus consistent with the thrust of national policy and is welcomed in the Draft Local Plan Review.



We welcome the chance to discuss this submission further with the Authority and in this respect, please don't hesitate to contact me (details below).

Yours sincerely



**Rackham Planning Ltd**



CC: Prestige Developments Ltd; David Cahill Design Consultant