

[REDACTED]

From: [REDACTED]
Sent: 05 December 2017 18:32
To: _WEB_Local Plan
Subject: Stroud Local Plan Review - Representations submitted on behalf of Redrow
Attachments: Redrow Representations Stroud LP Review 05-12-17 Final full.pdf

Dear Sir / Madam

Please find enclosed representations submitted on behalf of Redrow with regards to their land interest at Berkeley (BER B).

We look forward to confirmation of receipt in due course.

Kind regards

[REDACTED]
Director, Planning Development & Regeneration

GVA

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GVA
An **APLEONA** company



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Our Ref: Ref
Your Ref: Ref

5 December 2017

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 Q's 2.3a, 2.3c, 3.1, 3.3 b/c/d, 3.5a regarding South of the District and specifically Berkeley (site BER B).

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 site BER B.

Please find enclosed a completed form and the text of our representations is set out below. We also enclose the findings of initial landscape visual and strategy work for site BER B to demonstrate how the form of development might come forward.

Question 2.3a

Tell us about housing needs and opportunities in your area:

- ***Does your neighbourhood provide opportunities for local people to access the housing market, bearing in mind the growing gap between local incomes and house prices?***
- ***Are there opportunities in your area for households to rent reasonably-priced properties?***
- ***Are younger people in your neighbourhood able to access housing without moving elsewhere?***
- ***If older people in your neighbourhood wished to downsize to smaller, more suitable properties in the area, are these opportunities likely to exist?***
- ***Would individuals or small groups be able to locate suitable land for self-build projects in the neighbourhood?***
- ***Do you know of other unmet housing needs in your neighbourhood?***

We are aware of the planning permission for the land East of Berkeley which will provide 56 affordable dwellings over the next 2-3 years. However, the specialist affordable housing evidence presented to the Planning Inquiry to support the proposals East of Berkeley identified that even with this provision, it would not meet the requirements for the Berkeley Cluster area (as defined in the adopted Local Plan) going forward. Further sites are therefore required.

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We are not aware of any other sites which are planned to deliver affordable provision within Berkeley. Whilst there have been limited affordable schemes at Lynch Road and Fishers Road permitted in recent years, the lack of any strategic growth within the Town means that there is a significant under supply of open market dwellings (especially smaller and first time buyer units) and affordable housing. This low growth is explained by the lack of site allocations in the previous plan and the current adopted plan which resulted in only 3 completions (market and affordable) per annum between 2006 to 2014 for the Town and wider Berkeley Parish (source: Local Plan Examination evidence presented by SDC Housing Growth by Parish 2016 – 2031 explanatory note).

Question 2.3c - Do you know of any suitable land for development to meet the housing needs of your neighbourhood, or do you have suggestions about how or where these needs might be met?

We support the allocation of **BER B** (BER006) which will assist in providing affordable homes within Berkeley as part of a wider residential development.

Question 3.1 - How should we meet future development needs?

- **Option 1: Continue to concentrate housing and employment development at a few large sites located adjacent to the main towns in the district**
- **Option 2: Take a more dispersed approach with some medium sized housing and employment sites on the edge of the larger villages, as well as towns**
- **Option 3: Disperse development across the district with most villages including at least one small to medium site allocated to meet local needs**
- **Option 4: Identify a growth point in the district to include significant growth, either as an expansion of an existing settlement, or to create a new settlement**
- **Option 5: Do you have an alternative strategy option that you would like us to consider?**
- **Do you have a preferred option? Or would some combination of these approaches be the best way to meet our future needs? Please explain why.**

There is significant risk with the option 1 approach of under delivery given the complexities of bringing larger scale sites forward. Whilst these sites can and should play an important role (Redrow for example have interests South of Gloucester and West of Stonehouse), there is a need to provide a range of sites not only for housing number delivery requirements but to also distribute the economic and social benefits from housing development throughout the District.

We would agree that the option 2 dispersed approach is therefore appropriate as it would allow appropriate 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 3.3b - We welcome views on the most appropriate locations for housing and employment growth on the southern edge of Stroud District. Current Tier 2 settlements in the area are Berkeley and Wotton-under-Edge.

We support a level of growth at Berkeley given it's tier two status in the existing Local Plan and our client, Redrow has agreed an option with the landowner of the site north west of Berkeley identified as **BER B (BER 006)** on page 54 of the consultation document.

We note that the BER B site is shown as outlined in red and note therefore that it is considered that it 'may have future potential'. **These representations therefore seek to demonstrate that the BER B site should be taken forward as a preferred option for growth as it is considered suitable, available and now, deliverable.**

We would note that this site has previously been promoted on behalf of the landowner (by Court Consulting) as site reference 118 in the 2016 SALA exercise proposing development on 3.75 hectares

of the 6.5 hectare site to deliver circa 110 dwellings (including affordable). We also note that the site appears to have been submitted during the same SALA exercise by the Town Council under site reference 124 seeking a development of upto 60 dwellings (all market). At the stage of these submissions we understand that a developer was not engaged on the site, therefore with Redrow now actively promoting this site it should be considered as a serious contender for future growth.

Redrow has commissioned initial technical work to assess the potential capacity of site BER B notably in terms of highways and landscape matters. The initial work has confirmed that the site should not be constrained in terms of these of these but we do acknowledge that part of the site falls within floodplain. **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 circa 135 dwellings.**

The transport advice from Vectos confirms that the site can be satisfactorily accessed from the bypass without any need for third party land.

The advice from the Richards Partnership provides an appraisal of the overall landscape visual issues for the site and considers a landscape development strategy for the site to demonstrate how it might come forward. We therefore append the following information which demonstrates the findings.

- Opportunities and Constraints Plan;
- Landscape Development Strategy Plan; and
- Supporting photo sheets.

The above submissions confirm that, with the inclusion of an appropriate landscape development strategy, it would be possible to introduce development onto the site without giving rise to undue landscape and visual effects. This would include:

- The provision of additional structure planting along the B4066 to help filter views from this stretch of road;
- The extension of The Fishers (woodland) southwards along the site's western boundary creating both a strong visual screen and a green infrastructure corridor linking to the hedgerow network to the south;
- The creation of a small area of open space and tree planting at the local high point at the eastern corner of the site. This would filter views of the existing and proposed development from the road network to the north and east, helping to improve the somewhat abrupt and unsympathetic urban edge which currently exists. It would also, in time, mature to form a backdrop to the proposed development when viewed from the west; and
- The incorporation of street trees within the development, which, as they mature, would help to soften the development and assimilate it into its surroundings.

We note that the Plan (page 54) also indicates potential growth locations at **BER A** on Fitzhardinge Way and **BER C** on Station Road. We would note that BER B and BER C (BER011) are in the same ownership, and BER B should be considered ahead of side BER C 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 BER B to the town centre and being adjacent to the existing settlement boundary.

We would note that BER A falls under a different ownership and the development of this site could be reliant on access through site BER B, 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 BER A. Also it appears that some of the land comprised within BER A 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 BER B provides a better, more

deliverable option for access of BER A. It should be noted that there is no agreement in place to provide such a means of access from BER B.

Therefore in summary we note that site BER B represents the best sustainable and deliverable opportunity to provide appropriate 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.

Question 3.3c Do you consider that there is more potential for further growth at Sharpness/Newtown? What are the opportunities and are there any potential barriers to growth?

We note that Berkeley is classified as a tier 2 town within the Core Strategy and therefore considered as more sustainable in nature than Sharpness which is tier 3. Therefore we would suggest that the growth of Berkeley should be seen as a priority in planning terms ahead of some of the greenfield options around Sharpness, some of which are significantly detached from the built up form of Sharpness and Berkeley and require major infrastructure investment to bring them forward.

We would also note that Berkeley benefits from the growth of the educational and employment opportunities at the power station site. The recent planning permission for the land East of Berkeley further confirms the acceptance that growth around the immediate boundaries of the town is sustainable in nature. We would also note the Guiding Principles within the adopted Local Plan (item 4, paragraph 3.62) suggest that appropriate development will be supported to boost Berkeley's role as a Local Service Centre for surrounding communities.

Question 3.3d We would also like to know whether there are specific community needs arising from Berkeley, Wanswell and Brookend that could be met at Sharpness/Newtown; and what safeguards could be put in place to protect the local character and setting of existing villages.

At this stage we would note that existing community provision in Berkeley should be protected through appropriate growth in Berkeley. Any new developments at Sharpness will inevitably use Berkeley for access to services and facilities given it's superior provision (as recognised in the hierarchical status in the current Plan) and the fact that the majority of visitors and residents to Sharpness will pass through Berkeley.

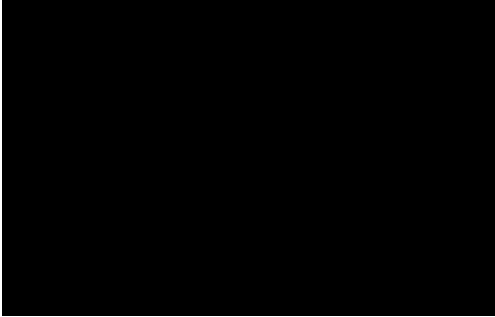
Question 3.5a- How should development proposals on the edges of our towns and villages be managed?

- ***Option 1: Continue with existing settlement development limits amended as necessary***
- ***Option 2: Assess proposals on a case by case basis using broader criteria (e.g. landscape impact; form of settlement, proximity to services, etc.)***
- ***Option 3: Continue with settlement development limits but expand the types of development that are allowed beyond them in the countryside***
- ***Option 4: Do you have an alternative approach that you would like us to consider?***

We would suggest that a rigid approach to settlement limits is only appropriate when they are reviewed on a regular and robust basis. We would note for example that the recent permission granted for land East of Berkeley was considered appropriate by the Inspector on sustainability grounds despite the site falling outside of the defined settlement boundary in the newly adopted Plan. Therefore we would suggest that option 2 maybe an appropriate position to consider. We recommend that Stroud District Council consider the approach taken by North Somerset Council in their adopted Core Strategy (2017) policy CS14 which allows for residential developments upto defined thresholds to come forward if adjacent to settlement boundaries of the larger settlements and technical criteria can be met. This provides reasonable flexibility to support growth in sustainable locations.

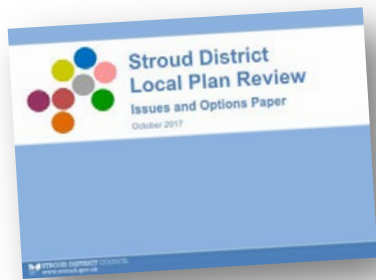
We hope that these representations are self-explanatory but please do not hesitate to contact me for any further clarification.

Yours sincerely



For and on behalf of GVA Grimley Limited

Enc. Completed Representation Form
Landscape Development Strategy
Opportunities and Constraints Plan
Photosheet 1 – 4.



Stroud District Council is starting the process of reviewing the current Local Plan. This consultation is seeking views about the range of issues that the next Local Plan will need to tackle, and options for addressing them. This includes the identification of potential areas for growth and development. We ask a series of questions throughout the consultation document (each of which is numbered). Please refer to the question number and/or topic in your response, where relevant.

You can download a PDF or an editable electronic copy of this form from our website www.stroud.gov.uk/localplanreview. You will also find the main consultation document on this web page, as well as some supporting material and further reading. **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (Local Plan Review: Call for Sites).**

The consultation closes on Tuesday 5th December 2017. Please email completed electronic responses to local.plan@stroud.gov.uk or post paper copies to **Local Plan Review, The Planning Strategy Team, Stroud District Council, Ebley Mill, Westward Road, Stroud, GL5 4UB**. Should you have any queries, the Planning Strategy Team can be contacted on 01453 754143.

Consultation response form PART A

Your details

Thank you for taking part. Please fill out your personal information in PART A. Your contact details will not be made public and won't be used for any purpose other than this consultation. We will not accept anonymous responses. Your comments may be summarised when we report the findings of this consultation.

Your name

(title): <input type="text"/>	name: <input type="text"/>
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Your company name or organisation (if applicable)

GVA

Your address (optional)

St Catherines Court Berkeley Place Bristol BS8 1BQ

Your email address *

<input type="text"/>

Your phone number (optional)

<input type="text"/>

If you are acting on behalf of a client, please supply the following details:

Your client's name

(title): <input type="text"/>	name: <input type="text"/>
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Your client's company or organisation (if applicable)

Redrow

Keeping you updated:

Would you like to be notified of future progress on the Local Plan review? (* we will do this via email)

- | | | | | | |
|------|----------------------------------------------------------|------------|-------------------------------------|-----------|--------------------------|
| i) | When the findings from this consultation are made public | Yes please | <input checked="" type="checkbox"/> | No thanks | <input type="checkbox"/> |
| ii) | The next formal round of public consultation | Yes please | <input checked="" type="checkbox"/> | No thanks | <input type="checkbox"/> |
| iii) | No further contact please | | <input type="checkbox"/> | | |

Consultation response form PART B:

If you have several different comments to make, you may wish to use a separate PART B sheet for each one (although you do not have to). If you use multiple PART B sheets, please make sure you fill in your name on each of them (you only have to fill out PART A once, as long as it is clearly attached to your PART B sheets when you submit the forms to us).

Your name

Your organisation or company

Your client's name/organisation
(if applicable)

The consultation is seeking views about whether the big issues identified within this paper are the right things to focus on and what options exist for tackling them. Are there other issues, options or opportunities that have been missed? **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (download a copy of the sites form at www.stroud.gov.uk/localplanreview).**

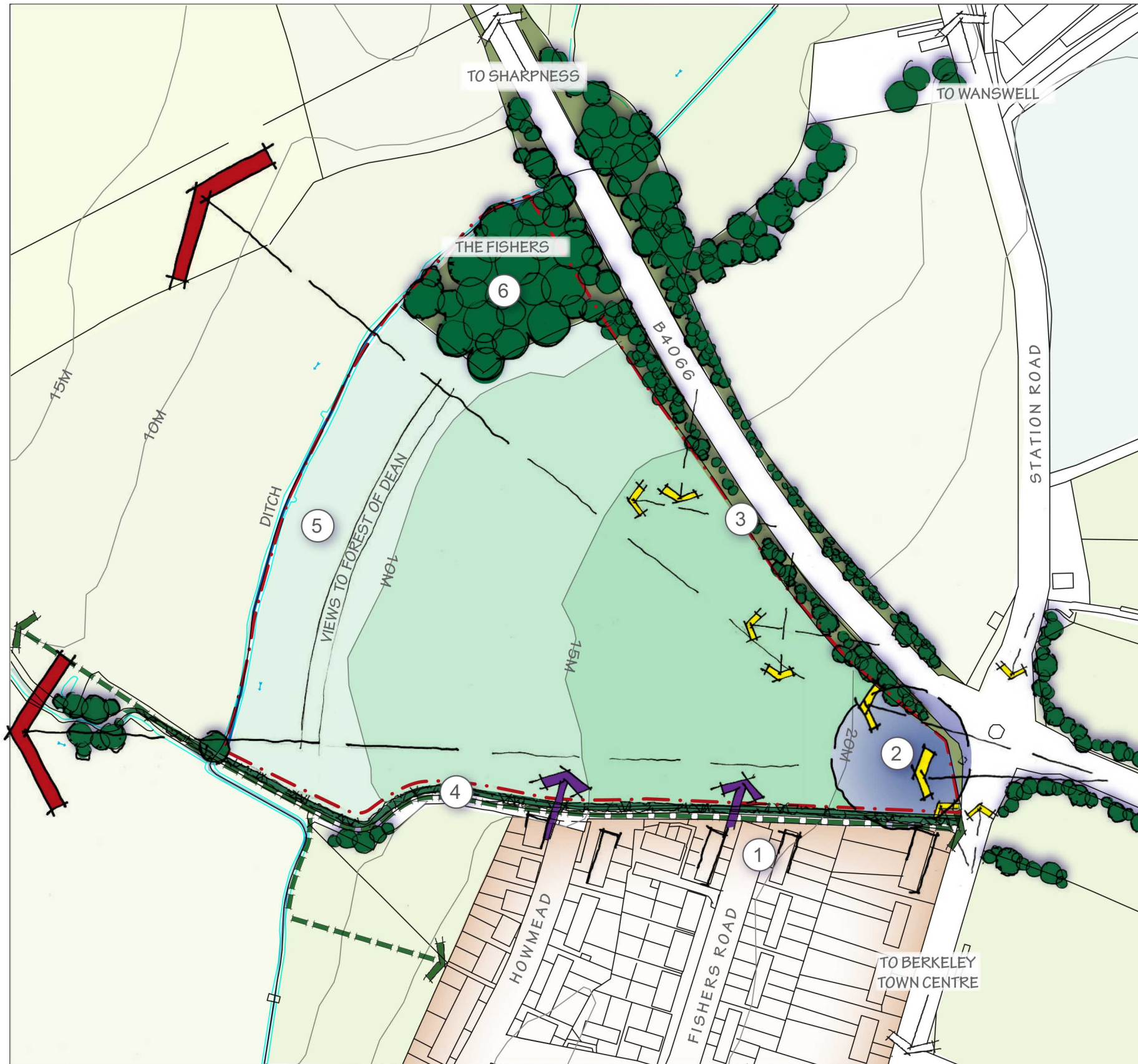
We ask a series of questions (highlighted in pink boxes) throughout the consultation paper. Each of the questions is numbered. Please can you reference the question number(s) and/or the topic here:

Question number: 2.3a, 2.3c, 3.1, 3.3 b/c/d - South of the District, 3.5a

Please use this box to set out your comments:

(Attach additional sheets of paper or expand this box if you need to)

Please refer to covering letter



Legend

- ① The houses on Station Road, Fishers Road and Howmead form the northern edge of Berkeley. These houses form an abrupt and somewhat unsympathetic interface with the countryside. While they have not generally been orientated towards the site there are, nonetheless, views across it from many of the properties.
- ② The eastern corner of the site forms a local 'high point', from which there are open views across the landscape to the west. It is also visible from the roads approaching the adjacent roundabout and forms part of the introduction to the northern edge of Berkeley (views 1-4). This area offers an opportunity to improve the introduction to the town from this direction.
- ③ The site's boundary with the B4066 is formed by a steep, vegetated bank which allows oblique views across the site from this stretch of road (view 5).
- ④ A well-used footpath runs along the site's southern boundary affording walkers clear views across the site in the winter months (view 8). In summer when the hedgerows have grown, views will become more filtered. Similar views will be available from the adjacent properties. There are a number of links to the adjacent streets and the path provides the opportunity to connect into any future development on the site.
- ⑤ The site's western boundary is formed by a steep-sided open ditch or rhyne, which has no vegetation along it and as such provides no visual containment to the site (view 9).
- ⑥ The Fishers is a dense block of woodland at the northern corner of the site which helps screen views of the lower parts of the site from the north. There is an opportunity to extend this woodland along the site's western boundary providing both screening and a green infrastructure link, which would be complementary of the existing landscape character, reflecting the many small blocks of woodland in the surrounding landscape.

Note: To be read in conjunction with photosheets 1-4

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Legend

- ① The local 'high point' is visible from the roads to the east as well as in more distant views. This area would be designed as informal open space with tree planting. This would help to improve the introduction to the town at this juncture, filtering views of the properties on Station Road. It would also act as a backdrop to the proposed housing in views from the west.
- ② A new road junction would be formed off the B4066 in order to access the site. This would necessitate the removal of a degree of vegetation. Additional planting would be incorporated along this boundary in order to filter and soften views of the development from the road and the north-east.
- ③ The proposed housing would occupy the centre of the site. It would be pulled back from the highest part of the site, which would be planted with trees, which would form a backdrop to the houses when they mature. Street trees would be planted within the scheme, ideally broadly following the contour lines. Over time these would help to soften and assimilate the development into the landscape from views from the west.
- ④ New woodland planting would be introduced along the western boundary. This would act as a screen to views from the west and form a strong separation between the site and the surrounding countryside, while at the same time providing a wide green infrastructure link between the existing woodland and the hedgerows to the south.
- ⑤ SuDS provision would be located in the south-western part of the site. There is the opportunity to incorporate this into a larger area of open space abutting the existing open land to the south.
- ⑥ There is an opportunity to provide pedestrian links to the footpath along the southern boundary, which links to both the town and the wider network in the countryside to the west. Pedestrian access would also be provided via the informal open space at the site's eastern corner.

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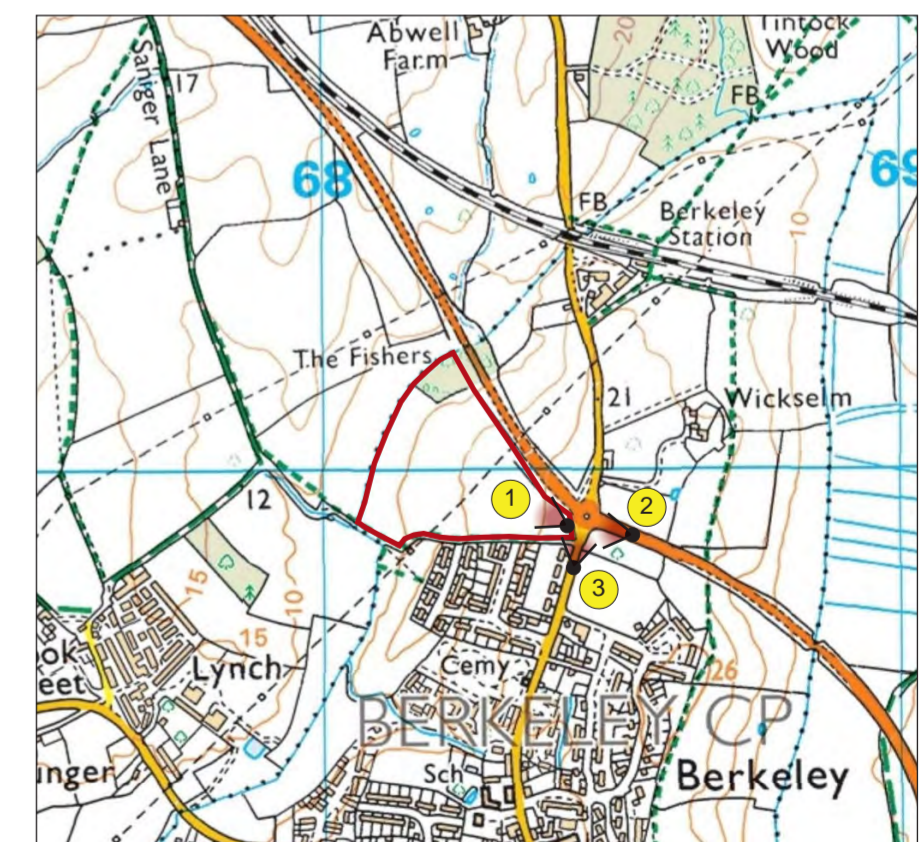
View 1. Looking westwards across the site from the entrance by the roundabout. The distance skyline is formed by the Forest of Dean.



View 2. Looking westwards from the B4066 as it approaches the roundabout to the north of Berkeley. The site sits just beyond the roundabout, with views across it towards the Forest of Dean.



View 3. Looking north-westwards from Station Road as it approaches the roundabout to the north of Berkeley. The site is located immediately beyond the house to the left of view.





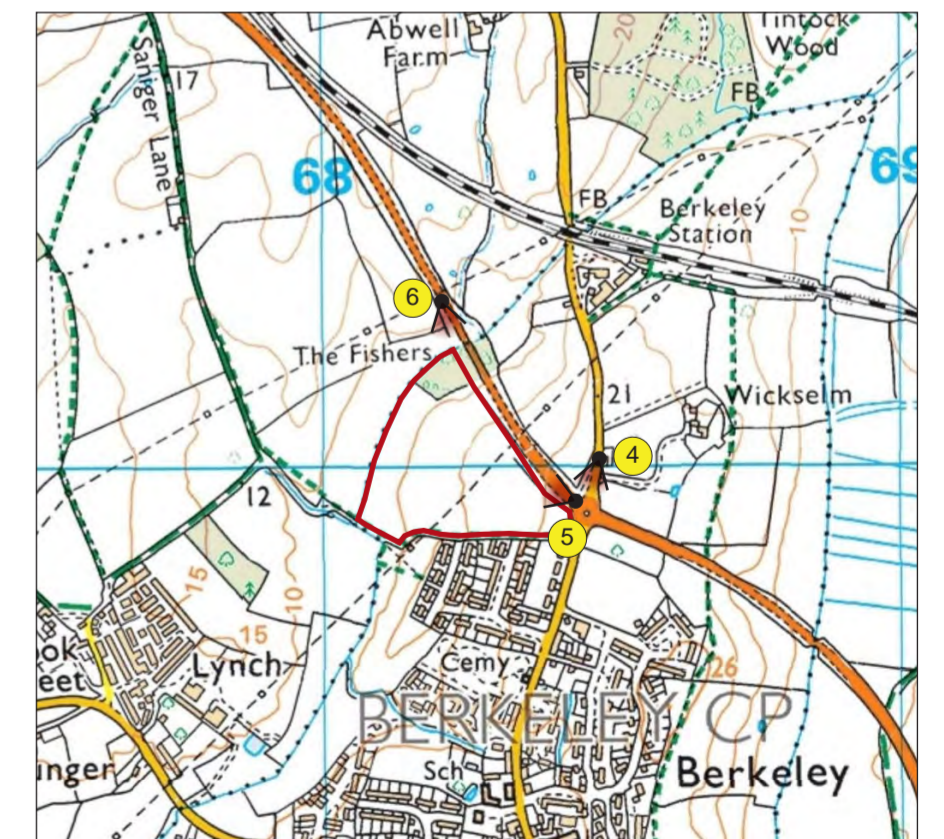
View 4. Looking south-westwards from Station Road as it approaches the town. The site is located adjacent to the houses to the left of view.



View 5. Looking north-westwards along the B4066 as it runs alongside the site towards Sharpness.



View 6. Looking southwards along the B4066 as it approaches Berkeley. The rooftops of the houses at the northern edge of the town are just beginning to come into view.





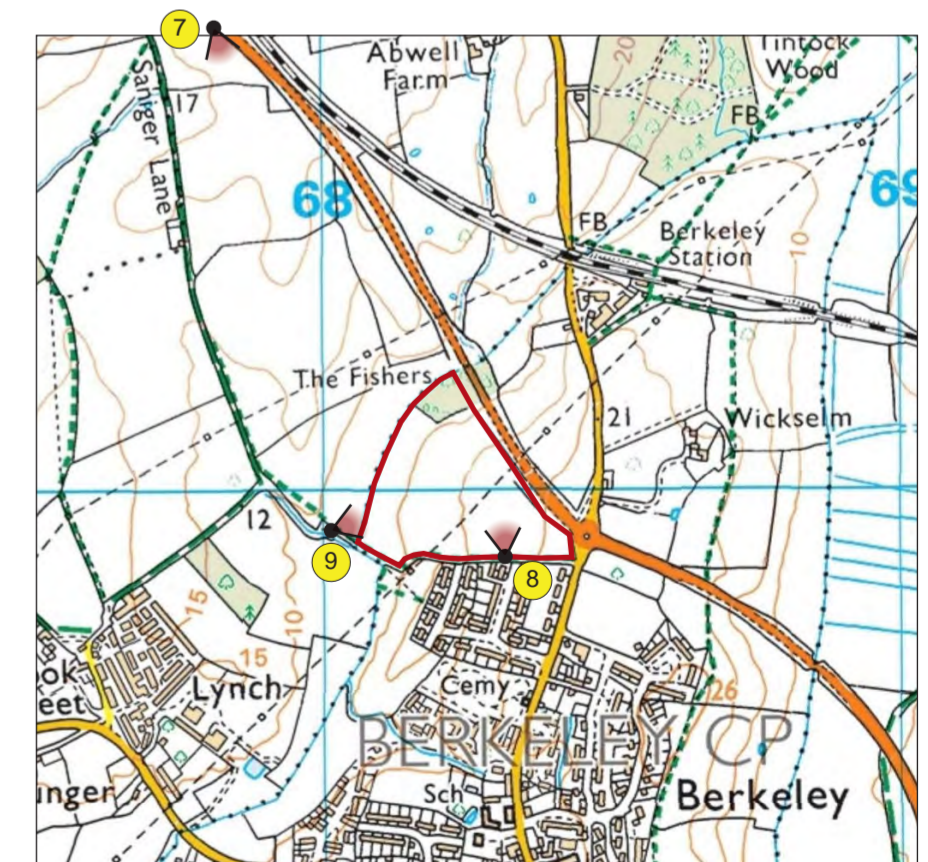
View 7. Looking south through a field gateway on the B4066. The town is just visible in the winter landscape, but would most probably not be during the summer. Berkeley Power Station forms a detracting element in the distance.



View 8. Looking looking north from the footpath that runs along the site's southern boundary (Berkeley Footpath 4). Similar views would be available to residents of Fishers Road and Howmead.



View 9. Looking looking east from Berkeley Footpath 4 from the western side of the ditch that defines the site's western boundary.





View 10. Looking east through a gateway on Hamfallow Bridleway 13. During the winter it is possible to discern the site through the intervening trees, in summer these views would be greatly reduced. The distant skyline is formed by the Cotswold ridge.



View 11. Looking looking north from Footpath Ham and Stone 9a to the north of Clapton Hill Break. From this location the site is largely screened by intervening vegetation and built form.



View 12. Looking looking east from Highfield Road to the north of Lydney. While the site has a visual relationship with the Forest of Dean, from this distance it is not possible to discern it with the naked eye.

