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To: _WEB_Local Plan
Subject: Stroud Local Plan Review Issues and Options Paper Public Consultation - Comments on behalf of Persimmon Homes Severn Valley
Attachments: Response to the Stroud Local Plan Review Issues and Options Public Consultation.doc; Land Promotion DPD Cam.pdf; Land Promotion DPD Kingswood.pdf; Berkeley Boundary.pdf

I attach a document with 3 appendices setting out comments on behalf of Persimmon Homes Severn Valley on the Stroud Local Plan Review Issues and Options Paper.

I would be grateful if you would take these into account and continue to keep us informed of the progress on the plan.

Please contact me if anything is unclear or if you would like to discuss any of the issues further.

Regards

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Stroud Local Plan Review Issues and Options Paper Public Consultation – Comments on behalf of Persimmon Homes Severn Valley

Question 1 – Priorities for Stroud District - Key Issues

Maintaining economic growth and meeting housing needs are key issues for the Local Plan to address and ensure that development is sustainable. In setting out issues there will clearly be conflicts between them, particularly between meeting growth and protecting the built and natural environment. It is not clear from a straight list of issues how these are to be prioritised and conflicts addressed.

We think it is particularly important that conflicts within specific topic areas are either avoided or addressed specifically. For example, there appears to be a clear conflict between Issue 3, to address high levels of commuting and Issue 4, to investigate transport improvements, which will inevitably only serve to increase the opportunity for commuting. In our view the potential role of Stroud District in meeting housing needs arising in Gloucester, means additional commuting is inevitable and therefore positive transport improvements to cater for it is the most important priority.

Issues 9 to 17 are grouped under the heading '*Affordable Housing*'. However, '*affordable*' is used in an interchangeable way, sometimes to refer to the NPPF definition of affordable housing and sometimes to apply to affordability in a wider sense. There is a need for greater clarity to make sure this distinction is clear. For example, the title could be changed to '*Housing which is affordable*'.

We agree there is a need for smaller, cheaper market homes, which will be more affordable in the general sense and it is a market that Persimmon Homes Severn Valley specifically seek to address. For example our proposals at Berkeley comprise a market mix which includes 61% two bed houses below 900 sq ft and only 15% four bed houses.

Issue 12, ensuring new housing development is located in the right place to create sustainable development, is a key consideration. However the settlement hierarchy approach adopted by the Council should mean development is directed to the right locations which are already sustainable and which would be supported by new development.

The principle change from the issues set out in the adopted Local Plan is the increased emphasis that will need to be put on working with neighbouring Authorities to meet housing needs (Issue 10) particularly in view of the acknowledgement in the Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury of a clear housing shortfall in Gloucester City and the fact that the JCS already identifies all of the most sustainable Green Belt locations. There is therefore a clear role for locations in Stroud District, south of Gloucester as the next most sustainable locations.

Question 2.3a – Housing Needs

There are clearly housing needs within Stroud which are not being catered for, not only due to market circumstances, but because insufficient houses have been identified in Stroud in the past in the right places.

There are a number of considerations here. The first is the impending adoption of the Gloucester, Cheltenham, Tewkesbury Core Strategy, and how the memorandum of agreement with Stroud will be taken forward. Stroud is part of the wider Gloucestershire HMA and the JCS Examination Inspector identified a housing shortfall in the JCS of 3,351 in Gloucester and Tewkesbury, including 1,346 specifically in Gloucester and a need for an early review of Gloucester's housing land supply to meet its need in the latter part of the JCS period.

Crucially the Inspector determined that the JCS would only be sound with a specific policy commitment to undertake early focussed reviews of the Gloucester and Tewkesbury housing land supplies. It is therefore important that the Stroud Local Plan Review is prepared in conjunction with this work so that relatively unconstrained land on the edge of Gloucester in Stroud can be assessed against other alternatives elsewhere. However, there is a mismatch in the timetables for the preparation of the Stroud and Gloucester Local Plans in the respective Local Development Schemes.

There is then an additional problem in Stroud where the timetable proposes that the Stroud Local Plan will not be adopted until 2021, which is outside the 5 yearly reviews advocated by the government and to be introduced into the NPPF.

The document Issues and Options document refers to the 2017 Housing White Paper '*Fixing our Broken Housing Market*'. Proposals set out in that have moved forward with a recent Government Consultation Paper '*Planning for the Right Homes in the Right Places*' which proposed a standard methodology for establishing OAHN. This will be implemented before the Local Plan is submitted and so is relevant in considering the housing numbers.

A summary of the Government's proposed methodology is:

- Demographic baseline based on an annual average household growth over a 10 year period;
- Work place-based median house price to median earnings ratio;
- Adjustment factor = $\frac{\text{local affordability ratio} - 4 \times 0.25}{4}$
- Local housing need = (1 + adjustment factor) x projected household growth.

Using this methodology the Government estimates a minimum OAHN for Stroud of 635 dwellings per annum, compared with the Local Plan figure of 456, a 39% increase. In reality the Government methodology only arrives at a revised OAHN figure not a housing requirement figure. It is therefore significant that the result is an increase of 39% in an unadjusted OAHN figure over the Council's fully assessed housing requirement figure. The figure derived from the standardised methodology can only be a starting point for deriving an appropriate housing requirement and requires additional upward adjustments for:

- Economic growth (NPPG 2a-018 says future job growth should not be jeopardised);
- Vacancy rates, second homes, concealed households;
- Housing needs – type, tenure, mix and specialist accommodation;
- Market signals (NPPG 2a-019 and 020).

In respect of other housing issues, whilst it is right to identify a lack of smaller or modestly priced properties to rent, there is equally a need for similar properties to buy. We recognise that self-build housing has a role to play, particularly in meeting needs at a local level and we support allocating specific self-build housing sites rather than seeking than a proportion of self-build units on conventional market/affordable housing allocations which does not provide the type of locations that self-builders aspire to.

Question 2.3b Local Housing Need Surveys

The value of local housing need surveys in influencing housing mix depends entirely on the methodology used and sample size and should not be the sole determining factor. Ultimately the builder, whether a large national house builder or a local contractor, has to be confident they can sell houses, otherwise they will not be built.

Question 3.1 – Future Growth Strategy

Four distinct strategic options are set out. We do not consider any single option on its own is realistic and will reflect the constraints and opportunities that exist. There are several reasons for this. Firstly, the principal town Stroud, which is the most sustainable location and should in theory be at the centre of a concentration strategy, is heavily constrained and cannot meet major development needs, without compromising the Cotswold AONB.

Secondly, the strategy of the adopted Local Plan which evolved over time was one of absolute concentration. Out of a total housing requirement of 11,400, 7,785 dwellings were committed, leaving a residual requirement of 3,615. The strategy concentrated 91% of these houses in five locations but with only 12% in Stroud Town itself. The dispersed element of the strategy was only 750 (21% of the residual).

Therefore we consider there is a need to redress this balance and enable more development in second and third tier settlements. In terms of those settlements that featured in the previous concentration strategy, we consider Cam is a sustainable and relatively unconstrained settlement which offers further opportunities for development in the Local Plan Review to specifically meet housing needs generated in Stroud District (as distinct from meeting Gloucester's needs elsewhere).

We therefore support a hybrid strategy which includes some concentration within a wider distribution strategy.

Question 3.2a – Gloucester's Fringe

It is clear that even as it is about to be adopted, the current Joint Core Strategy does not meet Gloucester's current housing needs and the JCS has only been found sound by the Inspector on the basis of an immediate review of those needs. Gloucester City with its very tight urban boundary, high density of development and designated Green Belt outside its boundaries means these circumstances are likely to reoccur in the future. This suggests, at the very least, a whole HMA approach is required. Indeed the Housing White Paper and the consultation paper 'Planning for the Right Homes in the Right Places' set out proposals to include a requirement in the NPPF for all Local Planning Authorities to produce a Statement of Common Ground for an agreed market area. This will be a requirement for the Local Plan Review.

Therefore we think consideration should be given now as to the role Stroud District can play. All the areas identified on the edge of Gloucester (G1, G2, G3 and G4) and Upton St Leonards, could have a role to play to contributing to meeting Gloucester's housing need, if not in this Local Plan Review, then in the future. In addition, consideration should be given to identifying some land as reserve sites to provide flexibility to respond if necessary.

Question 3.2b

We do not consider it appropriate to seek to establish a firm southern landscape boundary to the City which would be arbitrary and could be used to constrain the future growth of the City. Indeed we do not think it appropriate for this to be done in isolation in the Local Plan Review and if it is to be considered, it should be done on a sub regional basis in conjunction

with the JCS Authorities and, as set out above, in addition to allocating land to meet identifiable needs, also include reserve sites.

Question 3.2c

The treatment of and protection of Hardwicke, Haresfield, Brookthorpe, Whaddon and Upton St Leonards should be considered on a comprehensive basis as part of the consideration of development south of Gloucester, as set out in our response in Question 3.2b.

Question 3.3a – South of the District

Opportunities to improve transport links with South Gloucestershire need to be considered in the context of the emerging proposals in the West of England Joint Spatial Plan and Joint Transport Plan. These will provide sustainable transport links to Bristol and employment opportunities in the North Fringe of Bristol.

In this respect we suggest the Council should consider preparing a separate Statement of Common Ground with South Gloucestershire on the basis that the Housing White Paper/Planning for the Right Homes in the Right Places proposals suggest Authorities can consider more than one Statement of Common Ground.

Question 3.3b – Berkeley and Wotton-under-Edge

As we have commented elsewhere we think it is important that housing needs in Stroud District are met where they arise, particularly in view of the constraints in Stroud town to meet district wide needs in the most sustainable settlement. However, the position in Stroud town is mirrored somewhat in the Wotton Cluster, where Wotton-under-Edge itself has a tight urban boundary to the AONB with few, if any, opportunities for peripheral development. However, parts of Berkeley to the north of town are less constrained and clearly would have no impacts on Berkeley Castle. Therefore opportunities should be taken for further development to that being brought forward East of Berkeley by PHSV, to provide the opportunity for further improvements to the town and contribute to meeting housing needs in the south of the district.

Question 3.3c – Sharpness/Newtown

PHSV recently developed land at Newtown and our view is that the market at Sharpness and Newtown would not support major development.

Question 3.3d – Community Needs in Berkeley

We consider any community needs arising from Berkeley, Wanswell and Brookend should be met in accordance with the settlement hierarchy and the two second tier towns in the Wotton Cluster of Berkeley and Wotton-under-Edge in preference to Sharpness which is a Tier 3 village.

Question 3.4 – Hierarchy Based Approach

We generally support the principle of a hierarchy approach, particularly as there are a large number of villages which could potentially accommodate development. An approach which allowed development to be dispersed too widely would not be sustainable and potentially result in a large number of small developments, which would not contribute to and enhance services.

However in reviewing the plan, the opportunity should be taken to review the hierarchy both in terms of the number of tiers and in considering whether each settlement is in the correct

tier, as currently each tier contains a wide range of villages with different potential to accommodate additional services or new development, particularly in Tier 3.

We do not think it appropriate to set target numbers for each tier, but policies should set out criteria against which proposals should be assessed. Again the opportunity should be taken to review the criteria set out for each tier, particularly to reflect appeal decisions and Inspector's comments and to make the policies much clearer.

Question 3.5a – Development Proposals on the Edges of Towns and Villages

In addition, it is important to stress that when sites are proposed as allocations in the Local Plan Review they are supported by changes to the relevant settlement development limits and included within the settlement when the plan is adopted. This is to ensure consistent development management policies are applied in existing and new built up areas and allocated sites are treated in policy terms as part of a settlement and not part of the countryside.

The plan sets out four options for development proposals on the edges of towns and villages. However we do not think any single option is appropriate on its own and a wider approach needs to be taken and a number of key principles considered as follows:

1. The plan should not plan for the minimum housing requirement.
2. It should allocate sufficient sites to ensure it delivers assessed housing requirements.
3. It should build in flexibility in order to provide a safety valve and a response to change in circumstances.
4. It should enable a range of housing sites throughout the district to come forward to meet locally based housing needs in a sustainable way in each of the clusters.

Therefore we consider the plan should allocate sufficient development sites within a framework of defined settlement limits and set out a criteria based policy to enable additional proposals to be considered if necessary to meet any shortfall in housing needs and deal with changed circumstances.

Question 3.5b – Changes to existing settlement development limits

A necessary change is required at Berkeley arising from the grant of planning permission to PHSV on land east of Berkeley (S.14/0629/FUL).

Appendix 3 attached shows the existing and suggested revised boundary in the vicinity of the site.

As set out in response to question 3.5a, it is important that the new allocations are included within settlement development to ensure consistent application of development management policies

Question 3.6 – Broad Locations and Potential Sites

Given that development opportunities are clearly limited at the most sustainable settlement Stroud, we have used the landscape and accessibility assessments of settlements set out in the Issues Document to provide an indication of the next most sustainable alternatives. As a first sieve we have taken out settlements wholly constrained by the AONB and only included those entirely outside and unaffected by the AONB or only partially affected, where there is potential to accommodate development outside the AONB which would not impact on it.

Using the Accessibility Assessment, there are four settlements outside the AONB that are assessed as having very good or good access to services and facilities and a very large or large number of jobs. These are Cam, Dursley, Stonehouse and Kingswood.

In addition we have looked at settlements outside the AONB assessed as having a large number of jobs but poor or fair facilities, on the basis that jobs are more difficult to attract in a reasonable timescale than improving access to facilities in conjunction with development. That highlighted a further three settlements – Eastington, Berkeley and Frampton-on-Severn.

If the seven settlements are taken to represent the next best sustainable locations with potential to accommodate development, Persimmon Homes Severn Valley are currently promoting sites in two of these – Cam and Kingswood and documents setting out why the sites should be allocated in the Local Plan are included with these representations.

Question 4.1

We agree that it is important that the existing Local Plan evidence base is updated. Policies should be supported by a robust local evidence base rather than relying on wider generic evidence. In addition, the Council should ensure any evidence produced by local communities which is relied on as part of the Local Plan evidence base should be up-to-date and if it is not it should itself be updated.

Conclusion

I would be grateful if you could take the above comments into account in progressing the Local Plan Review. If anything is unclear please feel free to contact me.


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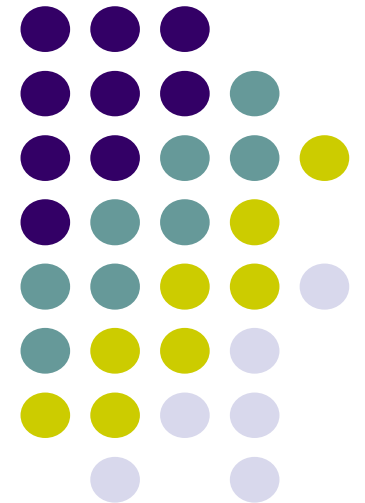
4th December 2017

APPENDICES

- 1 Land west of Draycott, Cam**
- 2 Land at Wickwar Road, Kingswood**
- 3 Berkeley Revised Development Boundary**

Land West of Draycott, Cam

Persimmon Homes
Severn Valley





Site

Cam and Dursley

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Section 1: Introduction

Vision

1.1 To achieve the allocation of land at West of Draycott, Cam controlled by Persimmon Homes Severn Valley.

Aims

1.2 To support the identification of Cam as a first tier accessible local service centre and focus for strategic growth in the Review of the Stroud Local Plan.

1.3 To identify land at West of Draycott as part of a sustainable extension to Cam and Dursley.

1.4 To demonstrate the deliverability of the land and provide the basis for the subsequent allocation of the land in the Local Plan Review.





Site

Section 2: Policy Context

NPPF

2.1 The National Planning Framework was published on 27th March 2012 as a key material consideration in the determination of planning applications. The document is an integral part of the Government's aim to make the planning system less complex and more accessible, to protect the environment and to provide a more streamlined mechanism that delivers the Government's aim to build 300,000 houses a year. The following items constitute a brief summary of the Framework's key messages, relevant to the promotion of land West of Draycott, Cam.

Para 7

- Sets out 3 dimensions to achieving sustainable development:

Economic, Social, Environmental

Para 14

- Establishes a presumption in favour of sustainable development.
- Local Planning Authorities should positively seek opportunities to meet the development needs of their area.

Para 16

- Local planning authorities need to update and produce local plans that are in conformity with the NPPF to retain control over shaping and controlling development in their own areas.

Para 17

- Sets out 12 Core Planning Principles.
- Every effort should be made objectively to identify and then meet the housing, business and other needs of an area.
- Focus significant developments in locations which are or can be made sustainable.

Para 47

- A key requirement for local authorities is to boost significantly their supply of housing.

Para 54

- Authorities should be responsive to local circumstances specifically in rural areas where market housing can secure affordable housing needs.

Current Local Planning Policy

2.2 The Stroud District Local Plan was formally adopted in November 2015 and is the development plan for the district.

2.3 The Core Strategy identifies 11,400 additional new homes between 2006 and 2031 with a residual requirement for approximately 3,615 dwellings.

2.4 Core Policy CP2 allocates strategic housing sites at Hunts Grove, Sharpness, Stroud, Stonehouse and North East Cam.

2.5 Core Policy CP3 establishes a settlement hierarchy, identifying Cam as one of the four settlements in the first tier of accessible local service centres.

2.6 Core Policy CP4 is a place-making policy which sets out guiding principles and a spatial vision linked to a number of mini visions for 8 area clusters.

2.7 Cam is within the Cam and Dursley cluster, which is identified as a strategic growth area in order to revitalise Dursley and Cam and provide a focus for rural communities in the south. In particular it will:

- Provide for 450 homes and up to 1,500 new jobs in a strategic allocation at North East Cam;
- Act as a major employment focus for the district;
- Upgrade Dursley Town Centre;
- Maintain the geographical and functional distinctiveness of Cam and Dursley;
- Conserve and enhance the high quality natural landscape, including the AONB and its setting.



Section 3: Land West of Draycott, Cam

3.1 The site is located in a sustainable town.
Utilisation of the site for residential development will:

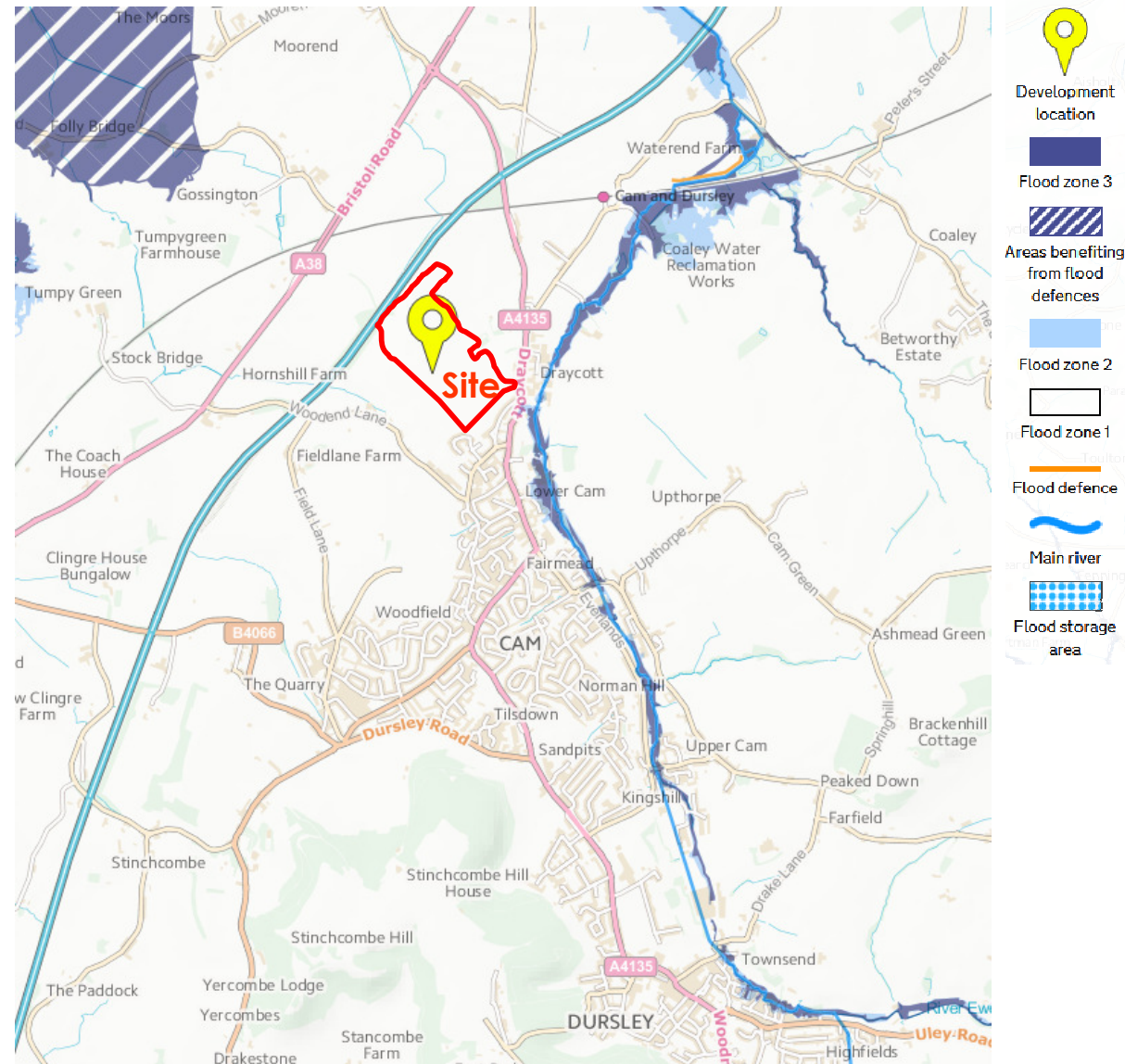
- Create a built environment that facilitates social integration and inclusive communities;
- Increase economic benefits through increased spending, construction jobs, Section 106 contributions and government new homes bonus;
- Deliver landscaping improvements to support wild life and SuDs to mitigate site drainage.

3.2 Therefore the inclusion of land at West of Draycott in the new Local Plan would be fully compliant with the 3 dimensions of sustainable development.

- The planning system must do all that it can to support sustainable economic growth. The proposed site could support sustainable economic growth by providing construction jobs, delivering increased investment and expenditure.

- The NPPF advises that full account should be taken of market signals to ensure the availability and deliverability of housing sites. Persimmon Homes consider this deliverability statement as proof of our intent to deliver high quality housing.

- This document also demonstrates that Cam is a sustainable location where development at West of Draycott will help to maintain existing facilities so that it is in accordance with NPPF Para 17.



Cam Flood Probability Map, Source: Environment Agency

Section 4: Planning Policy in Cam

4.1 The site was originally identified in the deposit draft of the Stroud District Local Plan, November 1999, under Policy Reference Hg1 for 250 dwellings. This allocation was for a smaller area due to overhead power lines which formerly extended west/east across the land and which was seen as a physical constraint and unviable to move at the time. The power lines have now been removed.

4.2 This allocation was deleted by the Council so that it would not impact on the development of the Lister Petter brown field site in Dursley which was considered to be more sustainable and a better policy fit in keeping with the regeneration of Dursley and the availability of alternative green field sites adjacent to the Stroud/Stonehouse urban areas.

4.3 However, this draft allocation demonstrates that it is a suitable and sustainable site for residential development in a different policy scenario.

4.4 The adopted Stroud District Local Plan November 2015 identified land to the north east of Cam for 450 dwellings and 11.4 hectares of employment in preference to the land West of Draycott. However the Local Plan Examination Inspector endorsed the sustainability of Cam and its potential for further development in his report:

- ‘Cam and Dursley are **significant sustainable settlements**, making up the District’s second largest population centre and in the first tier of the settlement hierarchy with an important retail, community and employment role and with good accessibility, including bus services and a railway station’;
- ‘Although **there may be some scope to accommodate more development here in the future**, the proposed allocation is consistent with the nature, scale and role of the existing settlement’;
- ‘**Further development** is not required to meet the identified housing requirement, but **could be reconsidered when the plan is next reviewed**’.

4.5 The advantages the Inspector identifies for north east Cam apply equally to West of Draycott as ‘**the site would provide excellent links to the local centre of Cam and is near the railway station.**’

(Our emphasis)

Emerging Cam Neighbourhood Plan

4.6 A Cam NDP Area was designated in February 2014 and work has started on preparing a plan which will need to be in conformity with the Local Plan.

Section 5: Settlement Context

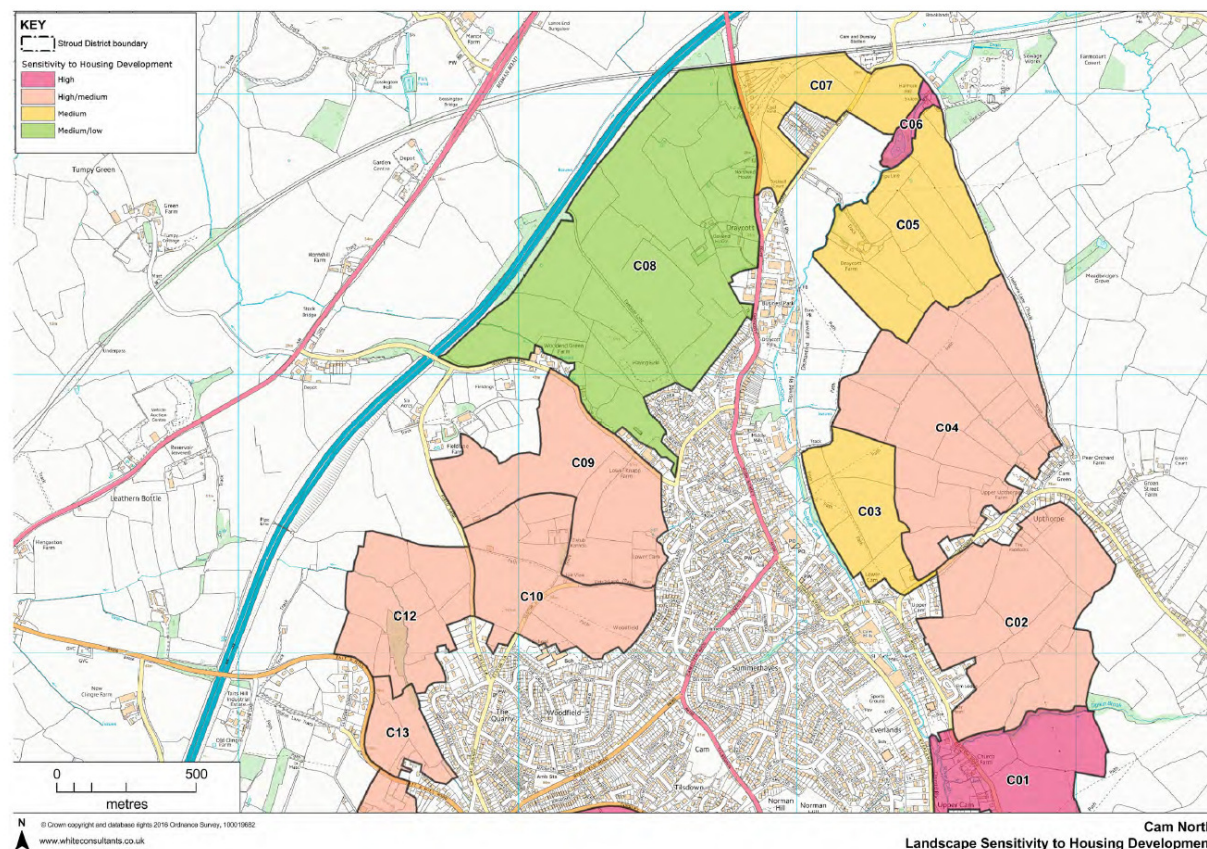
5.1 The Stroud District Settlement Role and Function Study, December 2014, identifies Cam as the second largest settlement in the District and together with adjoining Dursley, makes it a 'really significant conurbation and an important second focus for the District.' Cam is also one of the District's major employment hubs. Despite significant out commuting it is amongst the better performing settlements in terms of its ability to service the employment needs of its residents and it shows its strength as almost half its businesses are based in sectors that are forecast to see job growth. A high proportion of Cam's workers live locally.

5.2 There are only three active rail stations in Stroud District, one of which is in Cam.

5.3 Although Cam does not have a strategic retail role, it benefits from close proximity to Dursley, one of the District's two main retail centres. It also has the best local level of retail services in the District, with several neighbourhood centres and a Tesco supermarket in the main centre. These also provide very good accessibility to key services and facilities.

6.4 Therefore in the context of Stroud District, the urban area of Cam/Dursley is the second largest urban area in the District where it is entirely appropriate to accommodate additional development in the Local Plan Review, particularly in view of the severe constraints to further

development at the largest urban centre, Stroud. The development at the land West of Draycott will complement recent and continuing development north of Cam and help to maintain existing services and facilities and support the role of the town.



Section 6: Site Context

Landscape Setting

6.1 The Stroud District Landscape Sensitivity Assessment (December 2016) identifies the landscape importance of the setting of Cam and Dursley and this is the only site classified as medium/low landscape sensitivity to housing development and medium sensitivity to employment development.

6.2 Site specific landscape sensitivities which are identified in the assessment can all be addressed. In particular the existence of mature trees and hedges in an irregular field pattern can be accommodated together with the inter visibility with the M5 which will need to be addressed through a suitable landscape bund and additional planting.

6.3 An important consideration is that the land controlled by Persimmon Homes Severn Valley does not contain the fields around the listed Wood End Green Farmhouse.

6.4 Public rights of way across the site providing links to the wider countryside and the Jubilee Fields will be retained and development of the land will improve vehicular access to this important recreation area.

Site Characteristics

6.5 The site is assessed in the Stroud Strategic Assessment of Land Availability, May 2017, as a site with future potential (Site Reference CAM013).

6.6 The key characteristics of the site confirmed in the SALA Assessment are as follows:

- It adjoins the development limits of a Tier 1 settlement;
- It is not within a conservation area and does not contain any listed buildings, historic parks and gardens or schedule ancient monuments;
- It is not a key wildlife site, Special Area of Conservation (SAC), Special Protection Area (SPA), RAMSAR site or an SSSI and does not contain TPO trees;
- It is not within a flood risk zone;
- It is not employment land;
- It is not a protected outdoor play space.

6.7 As a result the SALA makes a positive assessment of the site. It says:

- There are no known physical constraints;
- No ground condition or stability problems;
- Development would not harm designated heritage or nature environment assets;
- Landscape sensitivity is medium low for housing uses and medium for employment and any impacts can be addressed by screening;

- There are no overriding physical constraints or potential impacts;
- The site could accommodate a mixed use housing/ community use/ employment scheme;
- The site is available and achievable.

6.8 The SALA Assessment confirms Persimmon Homes Severn Valley's own initial survey work regarding the potential of this site.

Site Details

6.9 The site has clear and well defined boundaries comprising:

- A northern boundary to the M5 motorway which runs on an embankment up to 10 m forming a well defined boundary;
- The western boundary is formed by Everside Lane;
- The southern boundary is to the rear gardens of existing houses on Draycott Crescent, together with a 50 m frontage to the A4135 which provides vehicular access to the land;
- The eastern boundary is formed by hedgerows and trees.
- The site is in agricultural use, predominantly low quality grazing.
- The site slopes from north/south and from west to east from 45 m AOD to 30 m AOD.

- The land is achievable, available and deliverable, being in a single ownership, The Trustees of the Excell Settlement and is controlled by Persimmon Homes Severn Valley by virtue of a single Option Agreement.

- The land can be accessed from the A4135 as shown on the Access Diagram.

- The land is adjacent to the Jubilee Playing Fields to the west of Everside Lane, which is a 16 acre site with sports pitches, skate park, play area and ball park. Access to the Jubilee Field is very restricted from Everside Lane and the development site can deliver an improved properly designed access road, which would enable further improvement of the playing facilities.



Photograph 5 View from Everside Lane adjoining Draycott Crescent, looking north over the southern point of the study area.



Photograph 6 View from the gateway off Everside Lane, looking east over the lower slopes of the study area.

Photographs from Land Appraisal by The Appleton Group, 1998



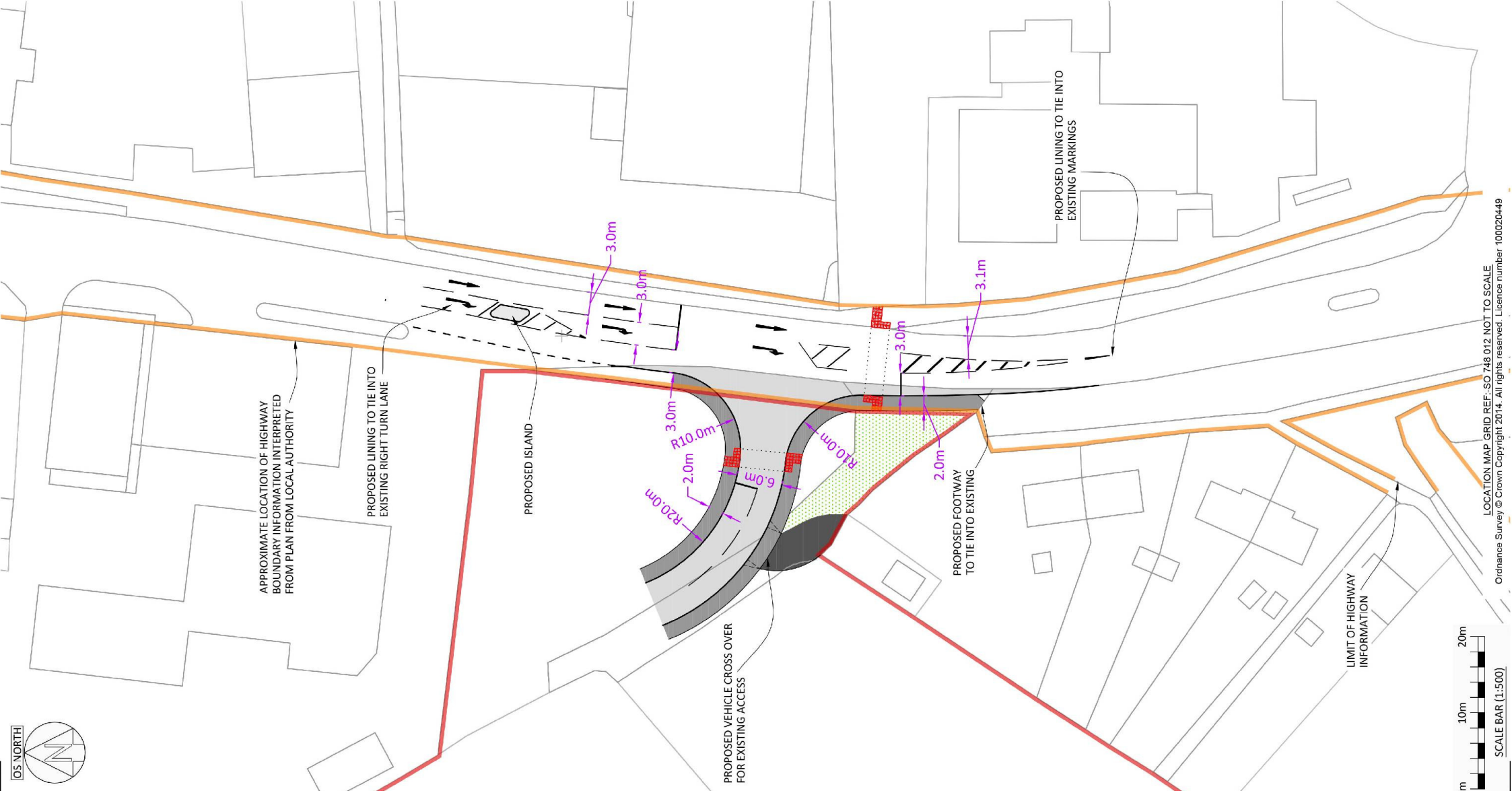
NOTE

APPLICATION AREA BASED UPON DRAWING
JDDDD_24-10-2014_14-52-30 (2).PDF

KEY

- PROPOSED KERB
- PROPOSED BACK EDGE KERB
- PROPOSED MARKINGS
- PROPOSED APPLICATION
- BOUNDARY
- HIGHWAY BOUNDARY
- PROPOSED CARRIAGEWAY
- CONSTRUCTION
- PROPOSED FOOTWAY
- CONSTRUCTION
- AREA NEEDED FOR PRIVATE ACCESS
- EXISTING TRACK NO LONGER REQUIRED
- PROPOSED CONTROLLED CROSSING TACTILES (RED)

Indicative Site Access



Rev	Date	Description	By	Cld
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Client:

PERSIMMON HOMES
SEVERN VALLEY

Project:
LAND OFF DRAYCOTT
ROAD, CAM, DURSLEY,
GLOUCESTERSHIRE

Project Number: C14909

Drawing Title:

INDICATIVE SITE ACCESS
GENERAL ARRANGEMENT

Drawn: Checked: Scale @ A3: Drawn Date: First Issue: 14/11/2014	AIT RMC 1:500
Drawing Status:	FEASIBILITY
Drawing No. 14909/SKT01	Revision -



LOCATION MAP GRID REF: SO 748 012. NOT TO SCALE
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Section 7: Why Land West of Draycott?

7.1 Persimmon Homes Severn Valley advocate the allocation of land West of Draycott, Cam identified as Site CAM B in the Issues and Options paper for the following reasons:

- The suitability of the location is demonstrated by the previous identification of the land in the Stroud Local Plan Deposit draft in 1999.
- The allocation of 450 dwellings and 12 hectares of employment land in the adopted Stroud District Local Plan, November 2015 demonstrates Cam is a sustainable location for further development;
- The land is not subject to flood risk;
- Development of the site provides the opportunity to provide an alternative approved access to the Jubilee Playing Fields and act as a catalyst for further improved recreation and playing facilities;
- The site has no impact on historical features and the proposed development would not include the fields around the listed Wood End Green Farm;
- There are no landscape or biodiversity designations affecting the land and it is identified in the Landscape Assessment as the least sensitive area around Cam;
- The land provides the opportunity to address any local landscape impacts, retain existing mature trees and hedges and provide a landscaping bund to the M5 which will further enhance the setting of the land.

FERSIMMON DEVELOPMENT
PROPOSALS

CONCEPT MASTERPLAN

1. Proposed New Vehicle Access point
2. Attenuation Ponds at low points of site
3. Housing fronts out onto roads and open space
4. Development blocks generally in perimeter block layout with active frontages and secure rear gardens
5. Open Space retained



Indicative Masterplan



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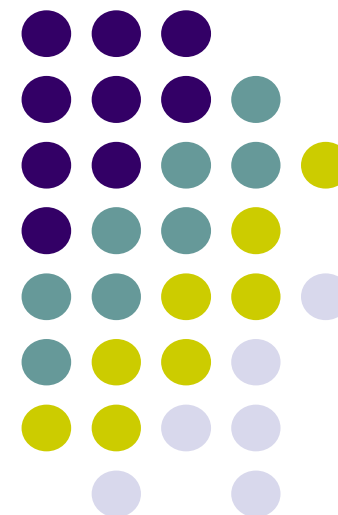


PERSIMMON
Together we make a home

Land at Wickwar Road, Kingswood

Persimmon Homes

Severn Valley





Kingswood

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Section 1: Introduction

Vision

1.1 To achieve the allocation of land at Wickwar Road, Kingswood controlled by Persimmon Homes Severn valley as shown on the attached plan.

Aims

1.2 To support the identification of Kingswood as a Third Tier Accessible Settlement with limited facilities and suitable location for appropriate scale in the Review of the Stroud Local Plan.

1.3 To identify land south east of Wickwar Road as part of a sustainable extension to Kingswood as the preferred option for expansion.

1.4 To demonstrate the deliverability of the land and provide the basis for the subsequent allocation of the land in the Local Plan.





Site

Section 2: Policy Context

NPPF

2.1 The National Planning Framework was published on 27th March 2012 as a key material consideration in the determination of planning applications. The document is an integral part of the Government's aim to make the planning system less complex and more accessible, to protect the environment and to provide a more streamlined mechanism that delivers the Government's aim to build 300,000 houses a year. The following items constitute a brief summary of the Framework's key messages relevant to the promotion of the land at Wickwar Road, Kingswood.

Para 7

- Sets out 3 dimensions to achieving sustainable development:

Economic, Social, Environmental

Para 14

- Establishes a presumption in favour of sustainable development.
- Local Planning Authorities should positively seek opportunities to meet the development needs of their area.

Para 16

- Local planning authorities need to update and produce local plans that are in conformity with the NPPF to retain control over shaping and controlling development in their own areas.

Para 17

- Sets out 12 Core Planning Principles.
- Every effort should be made objectively to identify and then meet the housing, business and other needs of an area.
- Focus significant developments in locations which are or can be made sustainable.

Para 47

- A key requirement for local authorities is to boost significantly their supply of housing.

Para 54

- Authorities should be responsive to local circumstances specifically in rural areas where market housing can secure affordable housing needs.



Wickwar Road, Kingswood

2.2 The site is located in a sustainable village. Utilisation of the site for residential development will:

- Create a built environment that facilitates social integration and inclusive communities;
- Increase economic benefits through increased spending, construction jobs, Section 106 contributions and government new homes bonus;
- Deliver landscaping improvements to support wildlife and SuDs to mitigate site drainage.

Therefore the inclusion of land at Wickwar Road, Kingswood in the new Local Plan would be fully compliant with the 3 dimensions of sustainable developments:

- The planning system must do all that it can to support sustainable economic growth.



The proposed site could support sustainable economic growth by providing construction jobs, delivering increased investment and expenditure.

- The NPPF advises that full account should be taken of market signals to ensure the availability and deliverability of housing sites. Persimmon Homes consider this deliverability statement as proof of our intent to deliver high quality housing.
- This document also demonstrates that Kingswood is a sustainable location where development at Wickwar Road will help to maintain existing facilities so that it is in accordance with NPPF Para 17.

Current Planning Policy

2.3 The Stroud District Local Plan was formally adopted in November 2015 and is the development plan for the district.

2.4 The Core Strategy identifies 11,400 additional new homes between 2006 and 2031 with a residual requirement for approximately 3,615 dwellings.

2.5 Core Policy CP2 allocates 4 strategic housing sites and outside of these, development will take place in accordance with the settlement hierarchy, set out in Policy CP3. This identifies Kingswood as a Third Tier Accessible Settlement with Limited Facilities which provide the best opportunities outside Local service Centres for greater self containment but will provide for 'lesser events' of development. This was tested in an appeal at Chestnut Park, Kingswood which was allowed for 51 dwellings.

2.6 Core Policy CP4 is a Place-making policy which sets out guiding principles and a spatial vision linked to a number of Mini Visions for 8 area clusters.

2.7 Kingswood is within the Wotton cluster, which provides very little specific guidance on Kingswood. However, it does identify some key features:

- Development opportunities are limited at Wotton-under-Edge due to the AONB and Conservation Area constraint sites adjoining the settlement boundary;
- Renishaw is based just outside Kingswood and is a major employer;
- 74% of working people commute to surrounding towns and cities (suggesting there is a need to increase self containment, for example by maximising the benefits of Renishaw);
- All local communities are active with a wide range of community groups.

2.8 It also sets out some guiding principles:

- The area will see no strategic development over the plan period;
- Appropriate development will be supported to sustain Kingswood;
- To boost Wotton-under-edge as a Local Centre and improve High Street vitality;
- To conserve and enhance the areas heritage assets, with particular emphasis on conservation areas at the heart of Wotton-under-Edge and Kingswood.

Planning Policy Issues

2.9 With no strategic development proposed, development on a local scale will be necessary to sustain the viability and vitality of the cluster, whilst protecting the heritage areas, but at the same time taking advantage of the key existing employment facilities including Renishaw, to provide the opportunity to reduce the level of out commuting. Development of land at Wickwar Road meets these objectives.

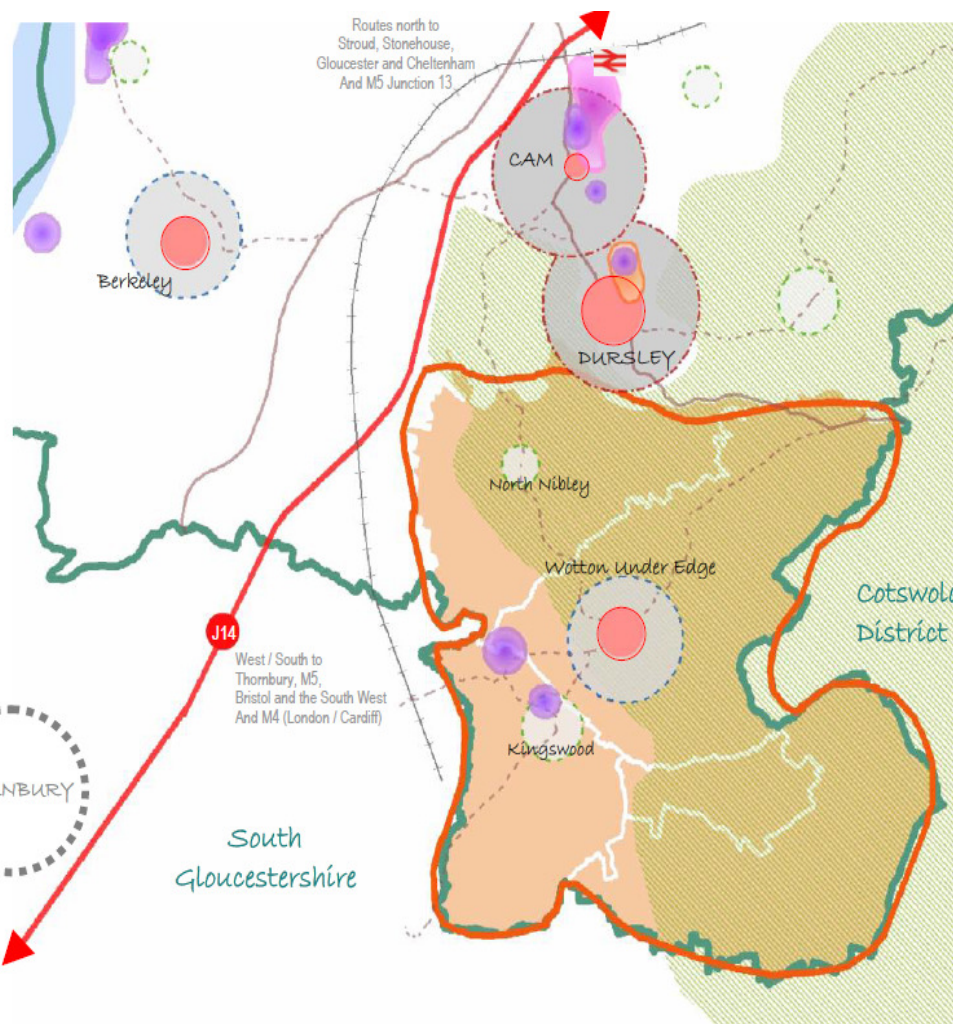
2.10 However, in relation to Kingswood it is important to stress firstly that opportunities for development within the built up area are currently limited and any residential development to support the role of the village would need to be outside the settlement boundaries. Indeed this was necessary in the first Stroud District with land allocated south of Charfield Road and north west of Chestnut Park (Policy HG22), and continued with the appeal decision at Chestnut Park in 2016.

2.11 Secondly, not all the 22 settlements listed in CP3 have the same level of facilities and the same character such that they either could support additional residential development outside the settlement boundary or indeed need to if there are opportunities within the existing built up area.

2.12 Thirdly, priority should be given to Kingswood in recognition of its role in supporting existing employment at Renishaw, in line with the other objectives of the plan to support employment opportunities.

Settlement hierarchy and key growth and development opportunities:

- Parishes:**
- Wotton-Under-Edge
 - North Nibley
 - Kingswood
 - Alderley
 - Hillesley & Tresham
- Towns:**
- "Local Service Centre":
- Wotton-Under-Edge
- Major villages:**
- "Settlements with limited facilities":
- Kingswood
 - North Nibley
- Town Centres:**
- Local service centres: a focal point for retail, leisure, cultural and community facilities, commerce and employment
- Growth and development nearby:**
- Strategic growth areas
 - Employment areas (outside of town centres)
 - Existing / ongoing growth areas
 - Conserving and enhancing the Cotswolds AONB
- Parishes of the Wotton Under Edge vision area**
- Stroud District boundary**



Vision Diagram 1.7:
spatial vision for the parishes around Wotton-Under-Edge

Wotton Cluster Vision Including Kingswood (Above Source: Stroud District Local Plan) and Kingswood Neighbourhood Development Plan (Right)

Kingswood Neighbourhood Development Plan

2.13 The Kingswood Neighbourhood Development Plan 2014-2031 was made on 18th May 2017. Policy SL1 focuses development at Kingswood within the settlement development limits, but includes criteria to assess development proposals outside the settlement limits.

Policy SL2 is a criteria based policy to support proposals that meet sustainable development characteristics.

Policy SL3 supports delivery of locally identified affordable housing needs which will be kept under review.

Kingswood

Neighbourhood Development Plan

2014 - 2031



Section 3: Settlement Context

3.1 The Stroud District Settlement Role and Function Study, December 2014 identifies the key characteristics of Kingswood.

3.2 It has a population of 1,389 but with an above average for the district of people aged 0-19, many of whom are likely to need housing in the near future. The projected population increase at 10% is below the district average. However, the trend for reducing household size means unless new homes are built the population will decrease. This in turn will lead to a reduction of economically active population and a decision needs to be taken on which settlements should have their employment role supported by additional accommodation for new economically active people. Given its location close to existing employment facilities, Kingswood should be supported by additional accommodation which this development site would contribute to.

3.3 Kingswood has a very strong employment role with almost 1200 local jobs. The biggest employment sector is manufacturing (influenced by the location of Renishaw) and with a high proportion of associate professional and technical workers and above the district average for professional occupations.



Source: Kingswood Neighbourhood Development Plan



Viewpoint 1: Wickwar Road near Neathwood Farm, looking north-east towards Kingswood: No view of site.

3.4 Commuting patterns in Kingswood are significant. It has a below average percentage of residents travelling less than 2 km and between 2 km and 5 km and a higher proportion (above average) travelling further than 60 km. It also has a high proportion of workers travelling in from outside the district and above distance travelled out of the district to work by local residents. All of this suggests there is potential to provide more housing development to support the local employment and reduce the impacts of commuting.

3.5 Kingswood has a Post Office, community hall, sports field and primary school and was assessed as 'good' in terms of overall accessibility.

3.6 All of the above suggests Kingswood should accommodate more housing in the next Local Plan period to support its role and function, take advantage of employment facilities nearby and support the use of its facilities and services.

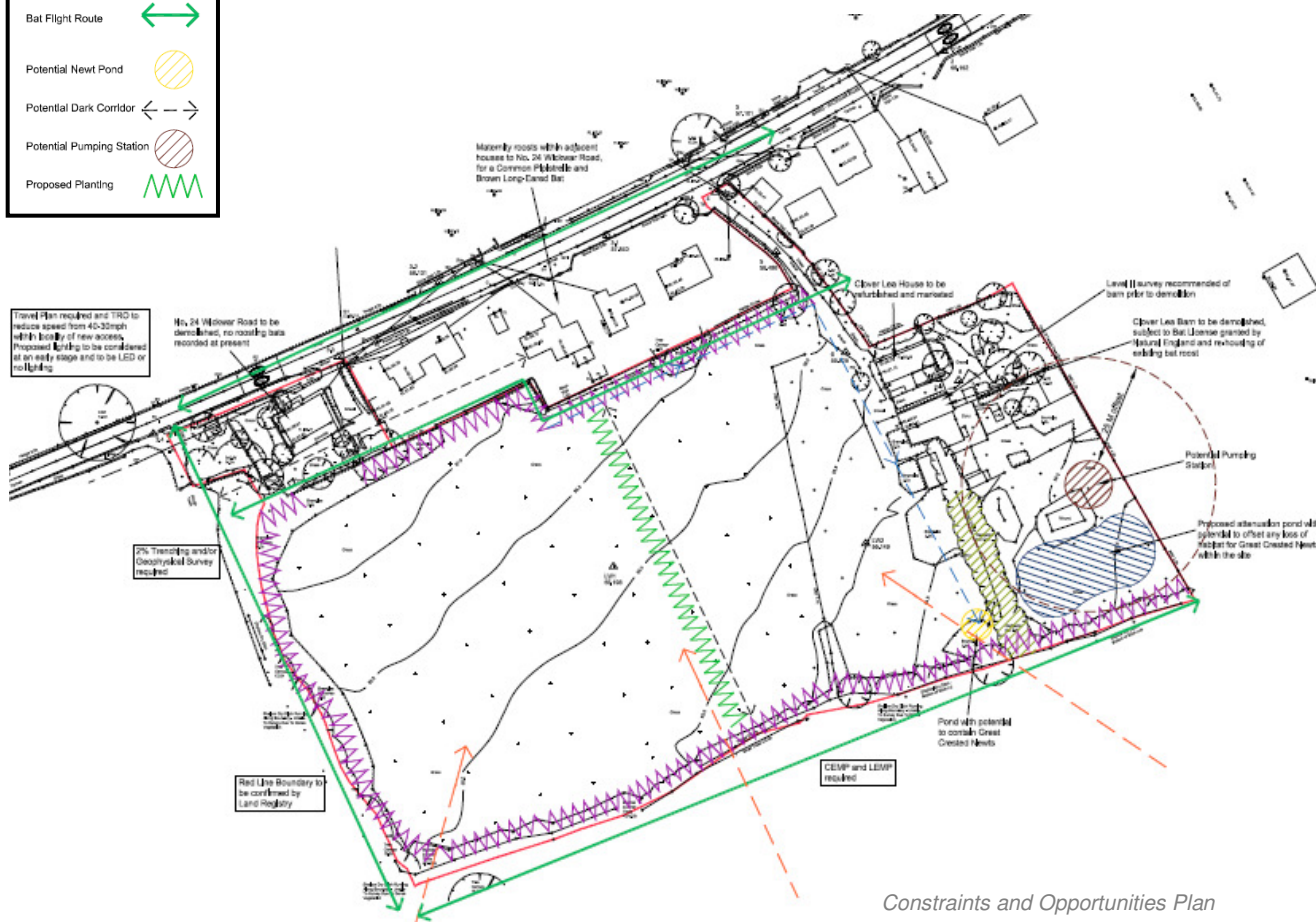
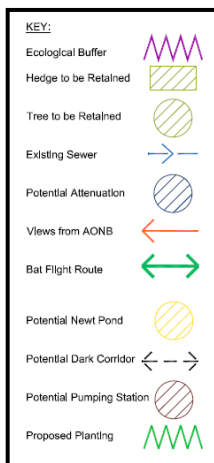
Landscape Sensitivity and Land Availability Assessment

3.7 Land to the south of Kingswood is identified with the lowest landscape sensitivity to housing development on figure 1 of the Stroud Landscape Sensitivity Assessment, December 2016. The area assessed (site KIN03) includes a wider open agricultural area to the south of the village. Therefore the Persimmon Homes Severn Valley land, which is well enclosed by mature hedgerows in isolation has even less impact in landscape terms. In the Stroud assessment of land availability, the site is the only site in Kingswood identified as a site with future potential in Appendix 3 of the document. This demonstrates:

- The site is relatively level;
- There is no known ground contamination or land stability issues;
- There would be no harm to designated heritage assets;
- There would be no harm to designated natural environment interests;
- Housing development may be appropriate in the small fields south of Wickwar Road and east of the wooded track which is adjacent to existing housing and screened by existing hedgerows;
- Redevelopment could provide for the demolition of 24 Wickwar Road to provide new access (although there are alternatives for access);
- Residential uses are compatible with the immediate area.



Viewpoint 8: Wotton Hill, looking south towards Kingswood.



Constraints and Opportunities Plan

Section 4: Site Details

4.1 The proposed site comprises approximately 4.86 acres located off Wickwar Road outside, but immediately adjoining, the settlement boundary of Kingswood. The site is in agricultural use and there is existing residential development on the northern and eastern boundaries. The site is close to the village hall and playing fields and is within walking distance of the centre of the village.

4.2 The site is suitable for residential development of up to 61 new dwellings (use class C3) with supporting infrastructure and facilities.

4.3 A planning application (Reference: S.16/0629/FUL) was submitted in March 2016 for residential development of 61 dwellings, public open space, landscaping and drainage infrastructure. A number of technical issues were raised in response to the consultation on the planning application, which were subsequently resolved. However, given the policy objection to the site being outside the settlement boundary and not allocated for development in the Local Plan or Neighbourhood Plan, the application was withdrawn in favour of promoting it through the review of the Local Plan.

Section 5: Why Wickwar Road, Kingswood?

5.1 Persimmon Homes Severn Valley support the allocation of 4.86 acres of land at Wickwar Road, Kingswood identified as Site KIN03, Option A in the Issues and Options Paper for the following reasons:

- Kingswood is a sustainable Tier 3 settlement;
- Kingswood has good access to employment;
- The scale of the site is in line with the scale of previous development in Kingswood;
- The site forms a logical extension to the development limits, is well enclosed and so would ensure the maintenance of the high quality landscape with no impact on views from the Cotswold AONB;
- There would be no harm to designated heritage assets including the Kingswood Conservation area;
- The previous planning application on the site demonstrates all other impacts can be subsequently mitigated;
- Development will support existing facilities in the village;
- Development will provide affordable housing to contribute to meeting housing needs in the south and the District.



Concept Plan

Drawing Revisions			
NO.	DATE	REVISION	BY

Schedule of Accommodation

Private

Accommodation Name	Size	No.	Total Gt Area (SqM)	Bed	Type
A1. Apartment	638	8	5104	2	Self-Contained
A2. Apartment	701	4	2804	2	Self-Contained
A3. Apartment	810	2	1620	2	Self-Contained
A4. Apartment	852	2	1704	2	Self-Contained
A5. Apartment	888	2	1776	2	Self-Contained
A6. Apartment	988	2	1976	2	Self-Contained
A7. Apartment	1000	2	2000	2	Self-Contained
A8. Apartment	1000	2	2000	2	Self-Contained
A9. Apartment	1000	2	2000	2	Self-Contained
A10. Apartment	1000	2	2000	2	Self-Contained
Total		42	39856		

Affordable

Accommodation Name	Size	No.	Total Gt Area (SqM)	Bed	Type
A1. Apartment	638	11	7018	2	Self-Contained
A2. Apartment	701	5	3505	2	Self-Contained
Total		16	10523		
Grand Total		58	50379		

Gross Site Area: 1.81 Hectares
 Net Site Area: 2.31 Hectares
 Site Density: 45.522 units/Ha
 Site Coverage: 18002 10.24%
 Allow for 20% Affordable Housing = 11 units

PROJECT:
Kingswood, Stroud

DRG TITLE:
Presentation Layout

JOB NO: 107	DRG NO: 100-1	REV: -
SCALE: 1:500 @ A1	DRN BY: RM	
DATE: 05/2015	CHK BY:	



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NOTES

Permission is granted to scale from this drawing for the purpose of Local Authority Planning Approval only. In all other circumstances DO NOT scale from this drawing. Please contact this office for any additional information required.

Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.

Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

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REV	DESCRIPTION	DATE	AUTH	CHK'D
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Key:

Existing Settlement Boundary - - - - -

Proposed Boundary —————

scale 1:2500

0 50m 100m 150m

TETLOW KING

ARCHITECTS : URBAN DESIGNERS : SUSTAINABILITY CONSULTANTS

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PROJECT

Berkeley, Stroud

For: Persimmon Homes

DRAWING

Amendment to Settlement Boundary Plan

SCALE	DATE	AUTHOR	CHK'D
1:2500 @ A3	FEB '14	RP	AF
JOB NO.	DRAWING NO.	REV	
PERS130306-SW	LP.01	-	