

Draft Representations Statement

Stroud District Local Plan

In respect of:
At:
Dursley

On behalf of:
Avant Homes

December 2018

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1.0 Introduction

- 1.1. McLoughlin Planning has been instructed by Avant Homes to submit Representations on behalf of its land interests in Dursley for the Stroud District Local Plan Review emerging Strategy Paper 2018. In terms of the Strategy Paper, Avant wishes to make a number of observations about the questions posed in the document and is essentially of the view that there are elements of the Paper that are sound in its treatment of Dursley and specifically Avant's land interests there. Where relevant, this document addresses the questions posed in the Strategy Paper setting out Avant's views on matters as per the questions.
- 1.2. With the above structure in mind, this document is structured as follows:
 - Section 2 – Responses to questions.
 - Section 3 – Site specific Representation.
- 1.3. In addition to the above, this document is accompanied by a Layout Plan prepared to support the allocation of Avant's land for housing development.

2.0 Responses to Questions

2.1. This Section of the Statement sets out Avant’s response to relevant questions posed in the Strategy Paper and these are answered as follows.

Question 1A

2.2. The Respondent’s position is that the issues identified are logical and reflect the District’s development needs. In terms of the way the issues are phrased, Avant wishes to raise the following comments:

- Issue 1 – The preparation of a Development Plan is about meeting a District’s development needs in terms of housing and new employment. It is considered that Key Issue 1 is right in so far as locating development in the right place supported by the right services and infrastructure, but actually the fundamental issue with Issue 1 is the level of housing development to be provided.
- Issue 3 – Avant do not see the maximisation of brownfield land as a central issue to the Plan. It fully recognises that there is a need for brownfield land to be developed, but it is not a priority when compared to earlier versions of National Guidance which sought to have a sequential approach to the release of land.
- Issue 4 – In terms of addressing the impacts of development, Avant are sensitive to this particular issue given that new development will inevitably have some form of impact on identified environmental considerations. The concern with the issue as identified is “indirect” nature of those impacts.

Question 1B

2.3. In terms of the way that the issues are proposed to be tackled, Avant has the following comments:

- Issue 1 – Avant supports additional development at sustainable locations in accordance with the Settlement Role and Function Study dated 2014. It also sees that there is a need for a wide portfolio of sites to enable a consistent delivery of housing development and not to put “all eggs in one basket” approach of relying on just a handful of large strategic development sites.
- Issue 3 – As referred to above, Avant is neutral on the needs to support the redevelopment of brownfield land and recognises the importance given to it in the Framework. However, the prioritisation of brownfield land should not and cannot be at the expense of the development of greenfield sites. Simply put, the District

has insufficient levels of brownfield land to meet its housing requirements. Whilst it is indeed desirable to see those areas of brownfield land in the District redeveloped, given that the Plans have consistently sought to redevelop brownfield land in the District and not all sites have come forward, it necessarily follows that there are instances where certain sites will be undeliverable for the foreseeable future. This therefore, places great reliance on greenfield sites to come forward and ensure the delivery of housing land.

- Issue 4 – In connection with the above response, Avant’s concern is how indirect impacts are quantified and mitigation of them qualified. If this logic is applied to development proposals, it is clearly easy to address or indeed identify what direct impacts are in terms of indirect impacts, the emphasis on the need to understand what these are could lead to decisions being made erroneously to refuse development proposals based on an unsubstantiated claim about indirect impacts.
- Issue 5 – In terms of dealing with the affordability issue there is a need for the Plan to differentiate between what is considered as open market housing and what is considered as affordable housing as per the guidance in the Framework. The reference to the provision of lack of affordable housing needs to be clarified that it is dealing with that that is purposely designed for the affordable sector rather than the open market sector.

Question 2.1A

- 2.4. Avant supports the Plan in terms of how it looks to address economic and job issues. The evidence base available in respect of settlement profile, shows that there are areas of the District where there is notable levels of out commuting to locations, either within the District or outside of the District and outside of the County. Whilst the Plan should make efforts to reduce the level of out commuting, it is simply impractical to expect all settlements to be self-contained. However, those efforts are supported by Avant because in terms of providing an element of self-containment or increasing the opportunities for self-containment, it drives the need for additional housing to be provided and a strategy by which the housing needs in the Government’s Standard Housing Numbers Methodology can be delivered.

Question 2.2A

- 2.5. Avant’s position in respect of the emerging Strategy’s desire to support the District’s varied portfolio of Town Centres is supported for the same reasons as per Question 2.1A.

Question 2.3A

- 2.6. Avant Homes welcomes the fact that on page 16 of the Strategy document, the document recognises the requirements of the Government's Standardised Housing Number Methodology and indeed, proposes a Strategy which looks to meet that as a bare minimum. Avant's preference would be for a more aspirational Plan that would deliver higher levels of housing development, but taking in to account National Guidance on the use of the Standardised Housing Number Methodology and that the number is minimum requirement which no Plan should go beneath. It necessarily follows that Avant supports the recognition given in the Plan for the particular target.
- 2.7. In terms of meeting housing need, Avant supports the broad spectrum of solutions that are available to the District Council as set out on page 18 of the Strategy document. However, it should be recognised that the allocation of greenfield sites will be an inevitable consequence of the need to meet the annualised housing requirement of 638 dwellings per annum. Avant caution the Plan against any strategy, which would look to potentially put that delivery rate under threat by virtue of the fact of providing a strategy which saw particular sites coming forward in preference to other ones.
- 2.8. Turning to some of the options available on page 18, Avant have the following comments to make:
- Build to rent – It is not clear from page 18 as to exactly what the Council's aspiration for build to rent homes are. Page 65 of the Framework provides definition of build to rent in that it is housing which is built for the rental sector, this is not built to rent for affordable housing as that would otherwise be known as affordable private rent. In terms of policy evolving in the Plan further as it goes through the Review process, it is considered useful for the Plan to give more thought to what the Strategy is for encouraging the build to rent sector, and how that is distinctly different to the affordable private rent sector.
 - Self-Build and custom built homes – Avant caution against any policy that would look to require an element of self-build or custom built homes to come forward from allocations made in the next stage of the Local Plan process. Avant's concerns with this particular issue are that there will inevitably be a wide portfolio of development sites and some of the smaller ones will be ill equipped to balance off the needs of environmental considerations and technical pressures with the need to provide a notional amount of self or custom built allowance for the simple

purpose of having such an allowance available. Avant's concern is that this could compromise the master planning and delivery of such sites.

Question 3.1A

- 2.9. In general terms, Avant supports the Vision 2040 set out on page 3 of the document. It considers the proposed Vision to be aspirational. However, in accordance with the Guidance in paragraph 15 of the Framework, there is a concern that some of the more peripheral matters could ultimately be clouding the overall message of the Plan, which is essentially to ensure that the housing and economic and social and environmental needs of a District are met in a Plan. There are some aspects of life style choice in the Vision, which we believe in this instance are an unnecessary distraction to the central message of the Vision which is about meeting development needs.

Question 3.2

- 2.10. Avant has the following comments to make on the Strategic Objectives:
- Strategic Objective SO1: Accessible communities – Avant's position is that it supports the need for affordable and decent housing for local needs. However, the Strategic Objectives need to recognise the requirement to meet the housing targets set out in the Government's Standardised Housing Number Methodology. Maintaining and improving accessibility to services and amenities is an important planning consideration, but the fundamental Strategic Objective of the Plan as per paragraph 15 of the Framework and paragraph 16 is meeting development needs.
 - It is considered that Strategic Objective SO1 should be revised to take account of what the role and function of the Plan is in housing terms and should be better aligned to mirror Economic Objective SO2, which identifies that there is a need to provide a very strong diverse and vibrant local economy.

Question 4.2A

- 2.11. In general terms, Avant supports the broad approach of the emerging Growth Strategy in terms of the distribution of growth required by National Policy for the District. As set out in other Representation's, the NPPF sets out the need to address the housing requirements. In so doing, paragraph 20 of the Framework equally requires full Strategic Policies to set the overall strategy for the pattern, scale and quality of development. When a Plan is examined, this overall strategy is a test of soundness. The Framework requires that a strategy has to be justified which takes into account the reasonable alternative strategies. In the context of Avant's interest at Dursley, the 2014 Stroud District Settlement Role and Function Study identifies Dursley as the fourth

largest economy in the District and the third largest Settlement with a higher than average percentage of working age adults and a lower than average percentage of retired population. It can be best characterised as a dynamic settlement with a good mix of population and economic activity. Given these facts, it is inevitable that a strategy will have to be adopted that seeks to direct additional development to Dursley. Given the development options that are available, it is equally inevitable that this will involve the release of greenfield land. In this context, Avant support the Development Strategy.

Question 4.4A

- 2.12. In terms of the definition of settlement limits, Avant wish to make the point that settlement limits should be designed to reflect existing patterns of development, as well as new patterns of development resulting from allocations for housing development. In this respect, it would be prudent to see the settlement boundaries of towns and villages across the District where there are allocations for housing development for both boundaries to be extended to encompass the allocations within development boundary. The benefits of this approach that in the longer term once the allocations are built out, it is clear as to what the extent of the settlement boundary is for any given settlement.

Question 5.0A

- 2.13. Avant Homes support the proposed mini Vision for Dursley. However, within the Vision it is felt that it would be helpful for the Vision to recognise the need that additional housing development will assist in meeting the continued needs of Dursley as well as assisting in providing a resident population growth to support the continued demand of the services and facilities in the town.

Question 5.1A

- 2.14. Avant Homes strongly support the allocation of site PS29 for housing development in the emerging Plan. In terms of the question posed, there are three main components. The first of which is whether growth is desirable, the identification of the best sites and whether alternatives should be considered. In response to these individual aspects, Avant's position is as follows:
- 2.15. The matter of growth being desirable cannot be an 'assumption' it is a necessity. National Guidance makes it clear about the need to build new homes to meet projected demands and the Standardised Housing Number Methodology equally makes it clear that the District is going to see a significant increase in its annual target over and above

the previous Local Plan. With this in mind, the Plan has to be working on the necessary requirement rather than assumption that growth has to take place. In accommodating the needs of the District, it is logical for new development to be located adjacent to the more sustainable towns and villages in the District.

- 2.16. In terms of Dursley as a location for growth, these Representations have set out that Avant clearly support the identification of Dursley as a growth settlement. Not only is this support based on the fact that Avant's site is identified as a potential allocation, but it is also based on the fact that there is a substantial evidence base supporting the Local Plan Review and indeed its predecessor, which identifies the fundamental role that Dursley performs in the District. This is one of the most sustainable settlements in the District and again, it necessarily follows that it should be a location where growth is directed. In terms of the identification of sites, as can be seen from a site visit, Dursley is a constrained settlement by topography and the AONB. Site PS29 represents the best option for additional development adjacent to the town, which is not in the AONB and not compromised by other physical environmental constraints. The following Section provides more detailed response seeking to promote site PS29 for development.
- 2.17. Turning to the matter of alternative sites, as can be seen from the previous Local Plan's Proposal's Map, Dursley is heavily constrained by the AONB to the south, east and to some degree, the west. In terms of other alternative sites being available, clearly the AONB is going to be a significant impediment to development.
- 2.18. In supporting the need to allocate Site PS29, paragraph 172 of the Framework requires that "great weight" should be given to protecting the AONB. Given the levels of development which are proposed, this inevitably leads to a question as to whether additional housing in locations within the AONB, but immediately adjacent to Dursley, could be considered as major development. If proposals for development in the AONB are determined to be major development, there is a requirement for such proposals to be Refused unless there is essentially a compelling need and the tests are met.
- 2.19. In terms of the tests, paragraph 172, bullet point B requires the decision take to look at the scope for providing development outside of the AONB or meeting the needs in some other way. In this case, Site PS29 is not within the AONB and immediately presents itself as an alternative option to any land which is within the AONB. Turning to the cost of the development of this site, Avant Homes is obviously aware of the outcome of the Appeal Decision. However, as will be demonstrated in the next Section, there is an evidence base to support the allocation of the site, giving the Plan the ability

to avoid development in this part of the AONB and/or triggering the major development test in paragraph 172.

3.0 Site Specific Representation

- 3.1. This Section of the documents sets out a Site Specific Representation on behalf of Avant's land interests at Dursley at Site PS29.
- 3.2. The plan attached shows how the site could be developed for circa 80 units depending on masterplanning.
- 3.3. In reviewing a Local Plan, paragraph 67 of the Framework makes it clear that Local Planning Authorities must have an understanding of the land available in their area. It goes on in paragraph 68, in the first bullet point that there is a requirement for Local Plans to identify the necessary sites to come forward within a five year period. This provides the context for which the Avant's site should be considered.
- 3.4. In supporting the allocation of PS29 for housing development, it is necessary to identify the evidence base which can be used to support the allocation. In this case the 2017 SALA provides an analysis of the site under parcels DUR010 and DUR013.
- 3.5. Turning to the analysis of the issues, this can be split into:
 - Landscape Impact
 - Other Technical Matters
 - Each is addressed in turn below

Landscape Impact

- 3.6. In supporting the allocation of the site, the previous Appeal decision, refusing planning permission on landscape grounds has to be addressed.
- 3.7. Whilst it is necessary to highlight the Appeal decision, the decision has to be seen in the context of what it was at the time. This was an Appeal against the refusal of planning permission under the previous Local Plan and the context of that decision does not necessarily carry forward into a subsequent review of the Local Plan. The Appeal decision is useful in that it identifies landscape as an issue. However, this also provides a basis for revisiting the site and seeing how it is possible to address the concerns. To this end, the attached plan shows development stepped back away from the highway, providing a clear buffer area, which can be used as public open space. This is a significant alteration to the scheme which was previously refused at Appeal and therefore, merits fresh consideration. To this end the SALA provides the necessary

analysis for supporting the development of the site and showing, from the Council's perspective, how the previous landscape concern can be addressed.

- 3.8. In the response to Question 5.1A, the issues associated with alternative sites have been addressed in the AONB, presents a significant policy impediment to development coming forward. Other issues that Dursley faces are obviously related to topography to the north and east. Given the sites exclusion from the AONB, it presents itself as a viable development opportunity.

Other Technical Matters

- 3.9. Having addressed the landscape concern, the Appeal Decision is notable for the fact that the Inspector saw no other technical concerns with the site. Therefore, it can be concluded that the site is:

- In a sustainable location within walking distance to shops and services and employment opportunities.
- From a Highway's perspective it can be accessed safely and there are no material impacts on the Highway's network.
- From a Flood Risk perspective, the site is outside the floodplain and that the site can be master planned to ensure that sustainable urban drainage methods are employed, not leading to any unacceptable elsewhere.
- From a Heritage perspective, there are no Heritage concerns or issues to be dealt with.

- 3.10. These conclusions are also mirrored in the 2017 SALA assessments for the site. Therefore, there are no other technical barriers to the site being allocated and developed.

- 3.11. To conclude, Avant have looked carefully at the Appeal Inspector's findings and have sought to modify the scheme to provide a more sympathetic form of development, which better meets with the concerns expressed in the Appeal Decision and the analysis in the 2017 SALA. The full details of the Layout's approach being adopted can be seen on the attached Plan that accompanies these Representations. The benefit of this revised approach is that it essentially seeks to take development away from the Highway and to provide a more softer edge through increased landscaping and areas of buffering between that existing development views in and out of the AONB. As a result of this work, it is considered that the proposal reflects on the concerns expressed by the Inspector and demonstrates a way by which these concerns can be overcome.

