From:

Sent: 05 December 2017 14:48
To: WEB Local Plan

Subject: Attachments:

Representations to Issues and Options Consultation
Appendix 1 to reps.pdf; Final Reps December 2017.pdf

Dear Sirs,

On behalf of our client, Avant Homes, we enclose representations and appendices to the Issues and Options consultation in respect of our client's site off Uley Road, Dursley. Please do not hesitate to contact the writer if you have any queries.

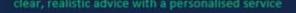
Yours faithfully

BELL CORNWELL LLP

Senior Principal Planner

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Local Plan Review

Our ref: 5192/LA

The Planning Strategy Team

Stroud District Council

Ebley Mill

Stroud GL5 4UB

05 December 2017

Dear Sirs

Stroud District Council: Local Plan Review, Issues and Options Consultation

Stroud District Council is in the early stages of producing a Local Plan Review to guide development across the District. The District Council is consulting on an Issues and Options paper which seeks to highlight some of the main issues which are to be addressed as part of the Local Plan. We support the Council's approach of pro-actively seeking to review the Local Plan in a timely way in order to meet the development needs of the District.

Background

This response is submitted on behalf of Avant Homes and we wish to promote a site (land at Uley, Dursley), which is suitable for development. We have previously submitted representations to the Strategic Assessment of Land Availability 2017, and the site was reviewed favourably.

We now enclose, as Appendix 1, a set of landscape plans, which include a site analysis, showing the site within its landscape context; a map which shows the wider setting and key views into the site, a set of photographs towards the site, a plan showing constraints and opportunities and two illustrative masterplans to demonstrate how the site could be delivered. We are happy to deliver either, depending on the Council's requirements moving forward. We also enclose a short statement providing a rationale for the designs.



In summary, the site is located on the eastern edge of the settlement of Dursley and is very well-located to the surrounding residential area. There are no physical constraints that would prevent the development of this site. The site is available for development, and is being actively promoted by a willing developer. It will therefore be able to contribute to the Council's housing land supply in the short to medium term.

The site is suitable and appropriate for allocation for residential development. In summary, the masterplan (option 1) shows an overall site area of 10.97 hectares, of which 2.92 hectares has been assessed as suitable for residential development. This results in a scheme of approximately 88 dwellings at a density of 30 dwellings per hectare. The relatively low density reflects the site's location which is in proximity (whilst outside) the Cotswold Area of Outstanding Natural Beauty (AONB).

The masterplan (option 2) includes a small additional small parcel to the north of the site off Uley Road (0.15 hectares) which would be suitable either for a small amount of additional residential development (4-6 dwellings) or for low level residential scale business development.

Two accesses are proposed from the existing highways network at Shakespeare Road and Uley Road and the masterplan shows linkages into existing footpaths and cycleways.

The proposal is landscape-led, and the areas proposed for residential development have been chosen to minimise any potential impact on the landscape. We note that the Cotswold AONB Conservation Board has not previously objected to development in this location.

The masterplan also shows significant areas that are proposed for public open space and ecological enhancements. The scheme has been designed to maintain and enhance the existing vegetation.

Given that the site abuts Dursley primary school, there may be scope to provide improvements such as drop off points to improve the parking situation at the school.

Key Issues

Whilst the key issues set out in the Issues and Options paper are generic, they are generally reasonable, and our site could actively assist in addressing those on housing matters.

Housing Requirement

Question 2.3a of the Issues and Options paper asks about housing needs and opportunities. These questions are generic and it is unlikely that they will result in tangible evidence coming forward. The starting point is that the Council has a high housing requirement and should aim to address this in



accordance with its own evidence base and Government policy as set out in the National Planning Policy Framework and the Planning Practice Guidance.

Question 2.3c asks about suitable land for development to meet housing needs. We have set out above how our client's site is available and suitable to meet this development.

Question 2.4a asks about community facilities and open space. The Masterplans (both option 1 and Option 2) include areas for both public open space and to provide play areas. These would have the effect of increasing the amount of open space and play facilities in the area.

Section 3.1 of the Issues and Options Paper does not quantify a housing requirement for the Local Plan Review. The Government's proposed formula for assessing housing need does show a considerable rise for Stroud District, with an increase from 448 dwellings per annum to 635 dwellings per annum. The final requirement will be advised through additional work including working with neighbouring authorities through the Duty to Cooperate. The signs are, however, that the District will need to find a higher amount of housing.

Section 3.4 of the paper sets out that Cam and Dursley are included at the top of the proposed settlement hierarchy, to be the primary focus for growth of homes and jobs. The evidence for the hierarchy is set out within a Settlement Role and Function Study that compares each town and village against a range of sustainability criteria on a consistent basis. This forms a robust, evidence based starting point for evaluating the spatial strategy.

Dursley Neighbourhood Plan

The Dursley Neighbourhood Plan has been published for its pre-submission (Regulation 14) consultation, with a consultation running between 10 November 2017 and 12 January 2018. We are concerned that the Neighbourhood Plan is likely to be out of step with the emerging Local Plan, and that it does not sufficiently grapple with the need to make deliverable allocations. The Plan sets out, as its development strategy that any site located outside the settlement boundary 'is neither required nor supported at the current time'.

The fact that the Neighbourhood Plan does not seek to make allocations for development is a wasted opportunity in terms of positive planning for the area. It also increases the probability of the emerging Neighbourhood Plan and the emerging Local Plan not being in conformity with each other, which could cause issues in meeting the basic conditions at the Regulation 16 stage.



The Neighbourhood Plan needs to clarify how it will take into account the emerging Local Plan and the housing needs within it. Given the timings, it may be necessary for the Neighbourhood Plan to commit to a timetable for reviewing the position with regard to its review.

We have previously met with the Neighbourhood Planning Group who agreed that they would reconsider our client's site if the housing requirement for Dursley increases in the future. We would be happy to discuss our proposed allocation with the Neighbourhood Planning Team on an ongoing basis, to ensure that the detailed design of the proposals properly reflects the aims and objectives of the Neighbourhood Plan and helps to deliver it. The Masterplan does reflect comments made by the Neighbourhood Plan Steering Group in June 2017, including a link through to the Uley Road, to increase permeability.

Response to Questions

Question 3.1: How should we meet future development needs?

We support option 2 which would allocate some medium sized housing and employment sites on the edge of the larger villages as well as towns.

This strategy would focus development in the most sustainable towns and villages, which benefit from shops and services and better transport facilities. This strategy would therefore be in accordance with Government policy which confirms that the purpose of planning is to achieve sustainable development.

Medium sized development is easier to assimilate into existing communities and requires less infrastructure than larger sites. Given the strategy of the existing Local Plan which focuses growth in a limited number of locations, it would be helpful to delivery rates to broaden the numbers of locations which will deliver development. Medium sized sites can provide housing more quickly, which is beneficial to the District's housing land supply.

When sites are in a variety of locations, there are less issues with market saturation and delivery can be speeded up.

The Government's housing white paper of 2017 (Fixing our broken housing market) sets out support for smaller and medium sized sites with the aim of assisting in making more land available for homes in the right places. This sets out in para 1.29 that "policies in plans should allow a god mix of sites to come forward for development so that there is a choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector...."



Question 3.4

In terms of the settlement hierarchy, we agree that this is a useful way of identifying settlements suitable for different levels of development. We agree that Cam and Dursley are, based on the evidence, highly sustainable areas for future development and are rightly identified as being in the top tier of the hierarchy.

Question 3.5a

This question asks how development proposals on the edges of towns and villages be managed, setting out 4 options. We agree that Option 1 (defining settlement limits) provide a useful and consistent starting point for the determination of planning applications if correctly defined.

The planning system is clearly plan-led and the role of the Local Plan is to allocate sufficient land in suitable locations to meet the housing requirement and to amend the settlement limits in accordance with this. In terms of paragraph 49 of the NPPF, the settlement limits would not be considered up to date if the Council could not, at any point, demonstrate a 5-year housing land supply.

Question 3.5b

We strongly suggest that the settlement development limit of Dursley should be extended to include our client's site.

Our site is identified in the broad locations and potential site allocations section as a broad location for future growth. The map on page 50 of the Issues and Options document shows that the preferred option is very clearly to the south east of Dursley. This is based on landscape sensitivity analysis, taking into account the Cotswold AONB. Sites which are being promoted in other parts of Dursley have been considered unsuitable or are not available.

Conclusion

We have set out above representations in support of our client's site (land at Uley, Durlsey), which is identified in the Plan as a broad location for the future growth of Dursley, based on landscape evidence that shows that the preferred direction for housing growth in landscape terms is to the southeast of Dursley. This site has previously been promoted to the Council, however, we now provide additional information in the form of illustrative masterplans showing two potential options for developing the site. We have also provided a landscape site analysis and some supporting analysis.



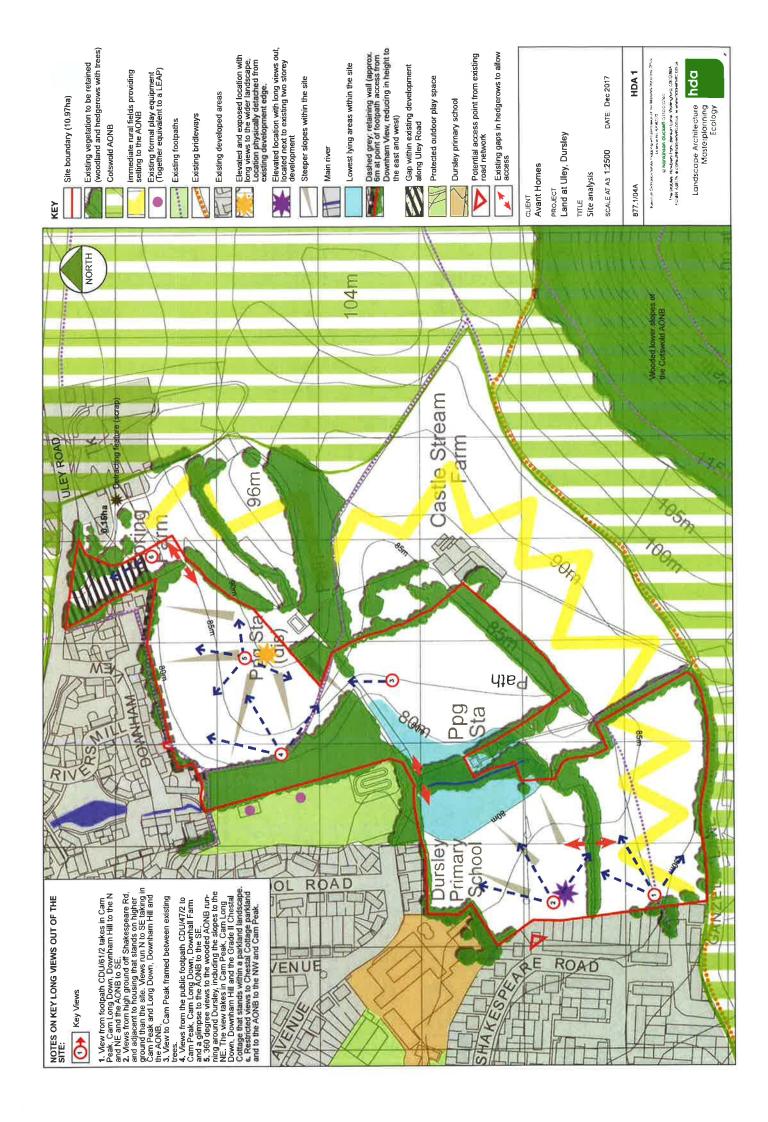
We are happy to discuss this further or to provide any relevant additional details.

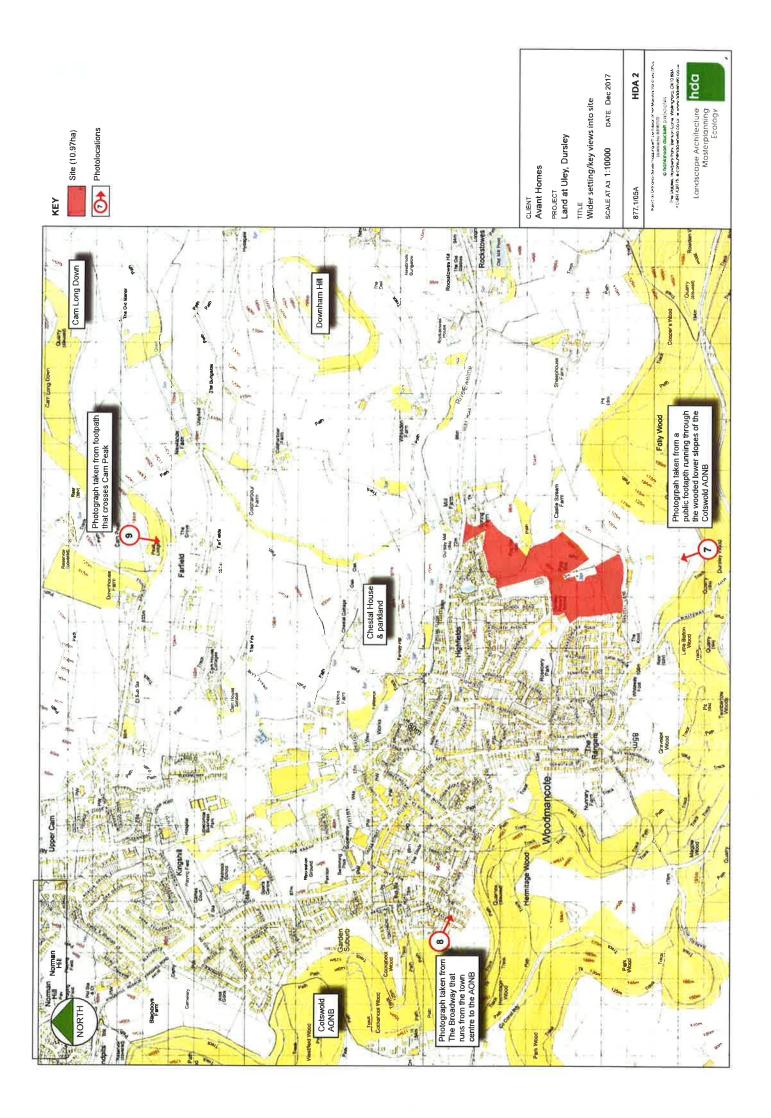
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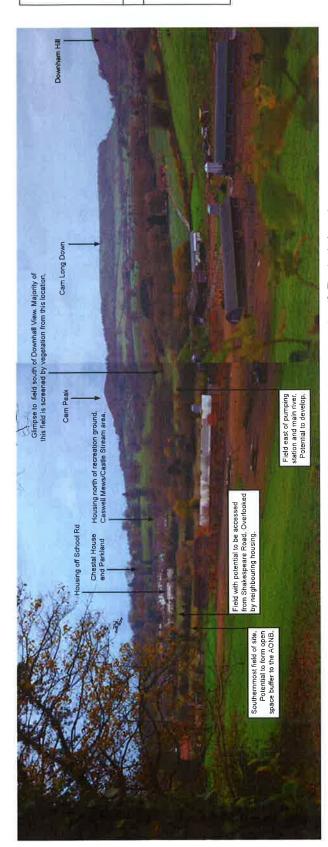
Yours faithfully,

BELL CORNWELL LLP

Senior Principal Planner







HDA 3

877, 1/06A

Landscape Architecture Masterplanning Ecology

DATE. Dec 2017

Photographs towards site

TITLE

Land at Uley, Dursley

PROJECT

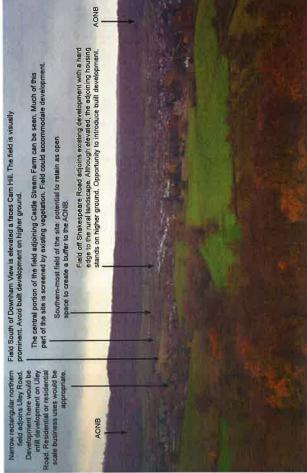
Avant Homes

CLIENT

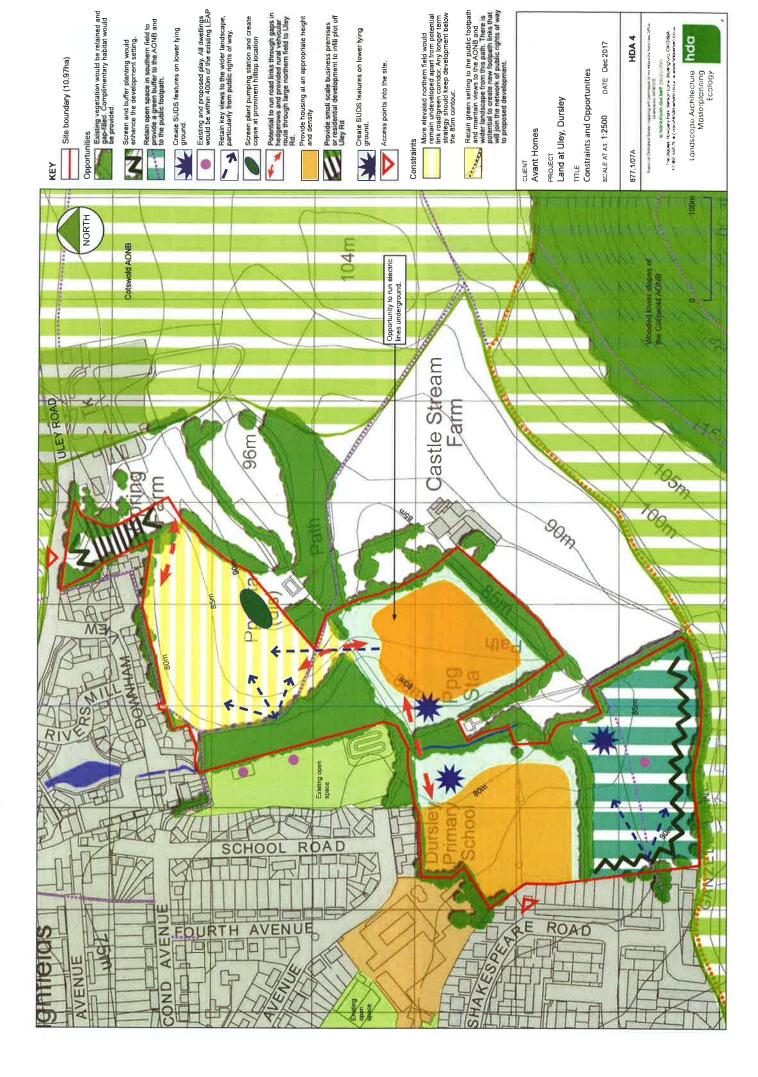
PHOTOGRAPH 7: View towards site from a public footpath that runs along the northern edge of Dursley Wood within the Cotswold AONB. The view looks north.



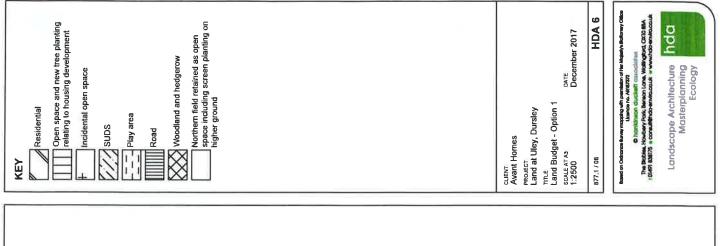
PHOTOGRAPH 8: View towards site from the AONB, west of Dursley town centre, The photograph looks to the SE from The Broadway, a road that rises up onto the AONB hills from the town centre.

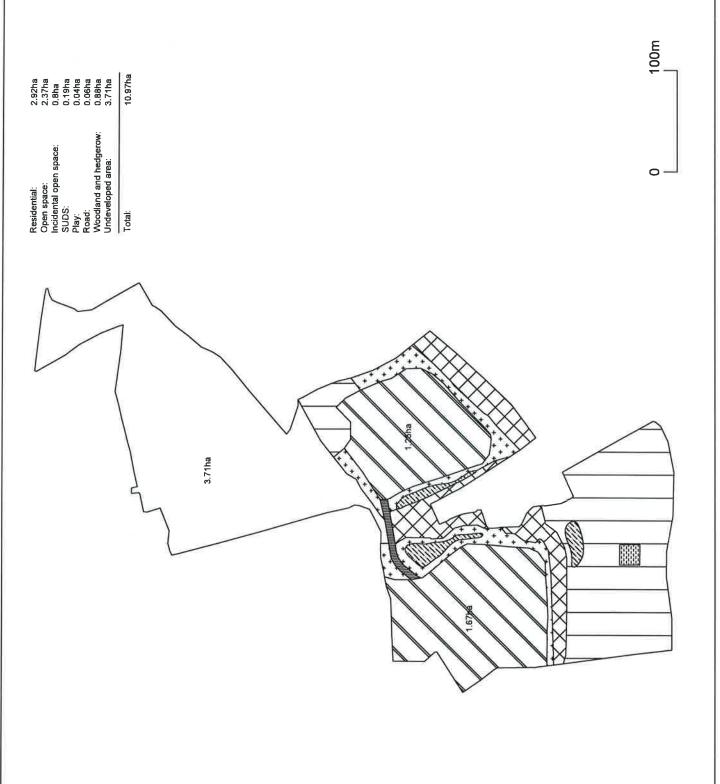


PHOTOGRAPH 9: View towards site from a public footpath that crosses Cam Peak. This point is very elevated and there is a 360 degree view.

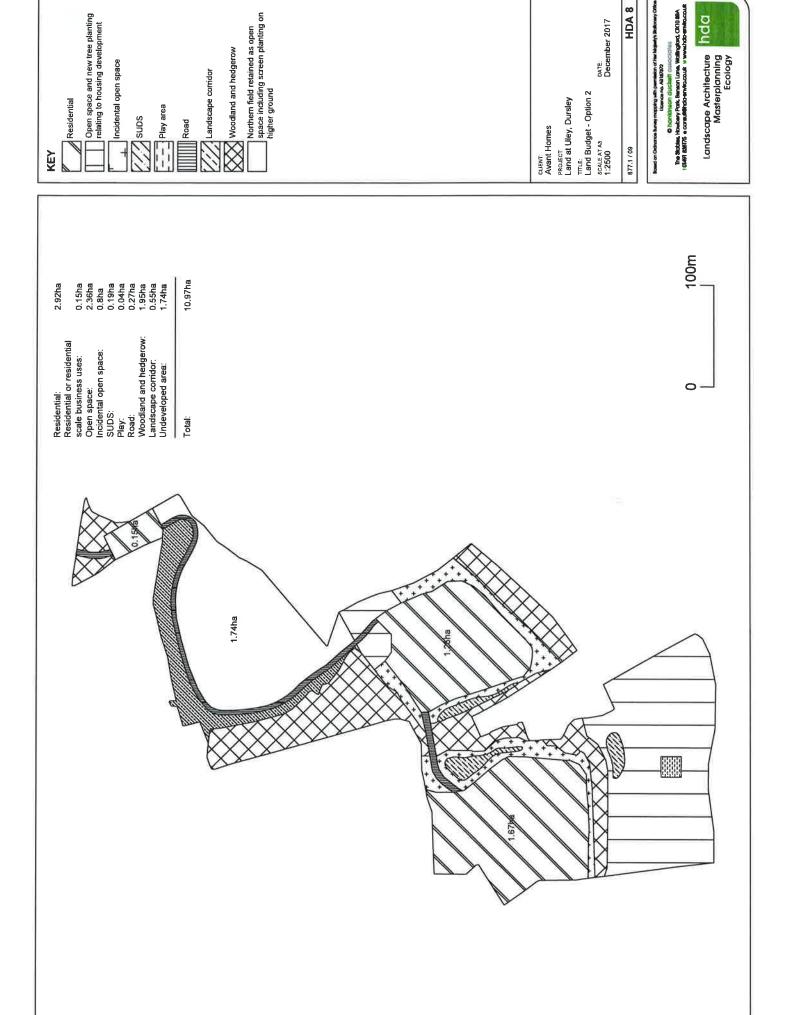












Land at Uley, Dursley

Landscape Statement

Produced for Avant Homes by Hankinson Duckett Associates
December 2017

HDA were commissioned by Avant Homes to carry out landscape analysis and high level masterplanning work for land at Uley, Dursley. The analysis comprised of a review of background information and studies, and site work to establish:

- site and local landscape character;
- relationship of the site to the AONB and its setting;
- extent of views into and out of site;
- how land uses might be zoned across the site to ensure the proposal 'fits' within the landscape and impact on the AONB is minimised.

The analysis work is summarised on plans HDA 1 to HDA 3. From the analysis work a Constraints and Opportunities plan (HDA 4) was prepared to inform a landscape-led masterplan for the site.

Summary of Analysis and Constraints and Opportunities for the site:

- The town of Dursley has developed along the valley floors of the River Cam and River Ewelme
 and is enclosed to the south and west by a bowl created by the major north-west to east
 ridgeline. To the north and east of Dursley further enclosure is provided by the steeply undulating
 and elevated landscape.
- This undulating landscape ensures that there are attractive and distinctive views out of the site to features such as the wooded slopes of the Cotswold AONB to the south and west and to Cam Peak, Cam Long Down and Downhall Hill to the north and east.
- The landscape analysis identified key views looking out from the site, including views from public rights of way (HDA 1).
- The analysis also identified publically accessible vantage points, from which the site was visible within the wider landscape (HDA 2 and HDA 3) and how the site is seen in the context of a setting to the AONB.
- These studies have led to the conclusion that the southernmost field of the site should remain undeveloped as it immediately adjoins the AONB and so would be most appropriate as a buffer to the AONB. The field is currently used by walkers and is linked to existing residential development at Dursley by a public footpath. It is an area that would be appropriate for use as public open space. A semi-natural character would be proposed to ensure appropriate setting to the AONB.
- The analysis also identified that the two fields adjacent to Shakespeare Road and Castle Stream Farm are well screened within views across the wider landscape. The fields are offset from the edge of the AONB and stand close to existing built development. As a result the fields were judged to be suitable for residential development at a height and density that reflects adjacent development. These fields include lower lying ground, close to the stream by the pumping station. This low-lying land is not within the floodplain and could accommodate SUDS features.
- The field south of Downham View is elevated above Downham View and is exposed to wider views, particularly from Cam Peak and The Broadway. The recommendation at this time would be that the field remain undeveloped, with the possibility of screen planting to the pumping station that stands at the highest point of the field. The field has potential to accommodate a

- road link running to Uley Road. It is recommended that should any built development be proposed for this land, in the longer term, that this be located below the 85m contour.
- The narrow field adjacent to Uley Road is relatively well enclosed by housing on both sides, but is viewed from Chestal House and parkland and has glimpses to wooded hillsides. This field would be appropriate for infill development, either residential or commercial, but at a residential scale.
- The analysis has identified options for open space and planting and this would include the
 creation of new habitats and links to the wider green infrastructure. Open spaces would be
 located so that they are closely related to development and retain open views to attractive
 features within the wider landscape.

Following the generation of a Constraints and Opportunities Plan, two masterplan options have been prepared. Option 1 restricts development to the southern half of the site. Option 2 extends to Uley Road. Key features of the proposals are listed below:

Option 1:

- The southernmost field would provide public open space for the development. It would retain the public footpath within a green setting and the field would create a buffer to the AONB.
- The POS would retain a natural character and new habitats would be created through native planting and inclusion of a SUDS basin.
- Views to the AONB would be retained from the public open space.
- Play equipment could be provided within this space.
- New planting would run along the western edge of the site to provide some additional screening of existing properties and the existing hard urban edge.
- The two fields could accommodate 2.92ha of residential land. Development would form back to back gardens with existing properties. Development blocks would be offset from existing vegetation to protect retained trees and their Root Protection Areas (RPAs) and to front development onto green corridors running alongside these vegetation belts. 88 to 117 dwellings could be accommodated with an average density between 30 and 40dw/ha.
- SUDS features would be located on lower ground, collecting surface water from swales running through the development.
- A small area of open space and an access route would be aligned with view 3 (HDA 1) to ensure the design maximises views to the wider landscape.
- New footpath connections would link the development to the existing public rights of way network.
- Simple circular access roads would be provided and lead to a hierarchy of residential streets and lanes.

Option 2:

The development areas would be the same as for Option 1, but would extend north to provide infill development off Uley Road and provide access through the site, linking Shakespeare Road and Uley Road.

- The link road could be low-key and rural in character. A narrow route with passing places would be appropriate.
- The road link would run along lower ground so that traffic movements would be less visible from the wider landscape.
- A landscape corridor including trees and a gently sloping swale would run alongside the road.
- Views to the wooded hillsides from the public footpath would be retained.

- A small copse could be planted on the top of the hill, screening the pumping station from the wider landscape and creating an attractive landscape feature in itself.
- New footpath connections would be made to link to the edge of Dursley.
- Infill development would be residential or small scale commercial.
- An opportunity exists to set this back from Uley Road, behind a landscape buffer. This would reduce any potential impact on Chestal House and its parkland setting.

