

# **STROUD DISTRICT LOCAL PLAN EIP**

## Submission on behalf of Avant Homes

### Matter 2 Spatial Strategy and Site Selection Methodology

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1. The purpose of this Paper is to set out Avant Homes (Avant) position in respect of the following Questions.

#### **Vision and Objectives:**

##### **Question 1**

2. In essence, Avant feels that the Plan is missing the opportunity to support its range of diverse communities and their strong sense of identity. Part of this is achieved through carefully managed growth. In the case of Dursley the Plan is limiting development, despite clear evidence available in the Plan which highlights that land is available and that it is the largest town centre in the District outside of Stroud.

##### **Question 2**

3. The purpose of the Mini Visions is to set out an overall objective for each one of the various sub-areas. In Dursley's case (where Avant's interests lie) the Mini- Vision recognises it as a focus for jobs and services in the southern part of the District. This is equally supported by the Strategy which highlights Dursley as the second largest Town Centre in the District. At the heart of the mini-vision is maintaining the vitality of these two centres. Avant's position that the Vision is disconnected from the Plan's actual approach to this settlement, as will be detailed in responses to other questions. Essentially, the Plan's Mini Vision is failing to set any meaningful levels of development at Dursley, but rather relying on Cam to take the bulk of the need.
4. Avant's position is underlined by Map7 on page 117 of the Plan which shows the Direction of growth clearly moving northwards of Cam. The Plan fails to recognise that there are opportunities outside of the AONB at Dursley for development.

#### **Spatial Strategy**

##### **Question 4**

5. The Avant position is that the Spatial Strategy is prepared on the basis of robust evidence, up to a point in terms of directing new development to sustainable locations. In terms of the overall scope of the evidence provided to support the Plan, it is clear that considerable

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effort has been undertaken to cover a number of technical, social and economic issues regarding the spatial strategy and site selection.

#### **Question 5**

6. Avant is not convinced by the Plan's heavy reliance on a small number of strategic delivery sites, including two new settlements. Whilst there may be a numerical argument for such sites, namely the ability to deliver a large quantum of housing in a handful of locations, the Plan fails to appropriately justify this based on evidence.
7. In terms of evidence, the primary source of the justification of the development strategy is detailed in Section 4 and Appendix 8 of the SA. This points to a new settlement/growth point strategy, based on a strategy of finding the least environmentally constrained areas of the District and focusing considerable levels of development in those locations as a means of meeting objectives such as:
  - Reducing the need to travel (especially by private car)
  - Providing significant quantities of affordable housing
  - Avoiding policy conflicts regarding the potential expansion of settlements or areas of settlements in environmentally more sensitive locations.
8. Whilst these issues are recognised as legitimate planning objectives, Avant is concerned that there is insufficient justification for such an approach and the Plan and strategy could have worked 'harder' to deliver a greater choice of development sites .

#### **Question 6**

9. Avant is concerned that there is a disconnect between the spatial strategy and the settlement hierarchy and scale of development proposed outside of strategic allocations. Given the low level of development (11% at non-strategic sites).
10. In terms of the Plan's overall approach, out of a total of 9,065 dwellings allocated as listed in Policy CP2 and discounting the 3,000 reserved to meet Gloucester's needs, the following is noted:
  - 8080 is directed to strategic allocations

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- Out of the 985 remaining
- 185 is allocated to Tier 1 locations (3 locations)
- 360 is allocated to Tier 2 locations (4 locations)
- 440 is allocated at tier 3A locations (7 locations)

11. Outside of strategic sites, it is clear that Tier 1 locations, such as Dursley only represents 2% of the overall number of homes allocated in the District. Such a small percentage does not mirror the objectives in paragraph 2.3.6 of the Local Plan. This seeks to concentrate development at the main towns, which includes Dursley.

12. Specifically referring to Dursley, the total number of dwellings allocated to the settlement in Policy CP2 (10 dwellings) equates to 0.1% of the Plan's overall allocation for the District. From a policy standpoint, Core Policy 3 considers that housing at Tier 1 locations are to:

*"They will continue to provide significant levels of jobs and homes, together with supporting community facilities and infrastructure to meet their economic potential in the most sustainable way. "*

13. Avant takes the position that the scale of development proposed at Dursley does not reflect the objectives of CP3 in that no meaningful allocations are proposed at the town.

14. Avant's concerns are articulated in the evidence base for the Plan in Document EB72, which is the most up-to-date source of data on the various settlements in the District. Although, the document has not been updated to reflect the Settlement Hierarchy in the emerging Local Plan. The document presents a generally positive picture about the vibrancy of Dursley as a location for growth, although the town has had the lowest level of housing growth for a Tier 1 location, at 3% between 2022 to 2018.

15. The aspirations of the Plan's strategy and CP3 have set out a positive framework for looking to address housing supply at Tier 1 locations and support the vitality and viability of these locations. Avant is disappointed to note that whilst new housing development is directed to Cam and Dursley, this is in the form of strategic urban extensions to Cam and opportunities to further expand Dursley have been ignored. Document EB72, in making the case for growth of Dursley (page 71), comments that it is:

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*"Growth should be priorities towards the District's larger and better-resourced settlements. As one the District's main towns, Dursley should be a priority location."*

16. This sets an approach that the Plan should be actively looking at opportunities for development. The Statement goes onto note that:

*"However, the town faces significant environmental, physical and topographical constraints, which make significant expansion difficult."*

17. In terms of that expansion, the Case for Growth does not rule out new development, but rather make the point that "significant" development at Dursley is "difficult", critically not impossible. . If the Plan was to continue as proposed would represent a continuation of minimal development at the town contrary to the stated aims of CP3.

18. In rectifying this issue, Avant's position is that there are opportunities to develop smaller, more readily deliverable site adjacent to the settlement, as put forward in the Regulation 19 Submissions.

#### **Question 11**

19. Avant's position is that the proposed strategy does not do enough to support the vitality of the second largest town centre in the District by limiting development at Dursley and looking to direct it to Cam and the Wisloe New Settlement. Additional housing development on the periphery of Dursley (as originally proposed by the Council) will assist in maintaining the town centre's economic performance.

#### **Question 27**

21. Avant questions to site selection methodology as documented in EB09 for the reasons set out in Avant's submissions made to the Regulation 19 Version of the Local Plan (these are documented in Section 4 of Avant's submissions).

#### **Question 28**

22. Avant is concerned about the site selection process in terms of the treatment of its land interests at Dursley and considers the approach adopted by the Council as unsound.

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23. Avant's Regulation 19 submissions (Section 4) clearly set out the background to how Avant's site at Dursley has been assessed by the emerging Local Plan and how it was put forward by the Council as a potential allocation. Critically, in proposing this as an allocation, EIP Document EB39 concludes (on digital page 27 of the document) notes the following:

"The Stroud Landscape Sensitivity Study identified the fields put forward in the site allocation (those directly south, east and west of the current pumping station). Provided the above measures are taken, the site is considered suitable for housing development."

24. Therefore, from a professional landscape evidence base standpoint, the site is capable of development. The decision of the Plan to delete the allocation and not carry it forward into the Regulation 19 Version of the Plan is documented in paragraph 2.4.7 of document EB9. In deciding to delete the proposed allocation, the document notes that:

*"But AONB issues contributed to PS04 and PS29 being progressed no further as proposed allocations."*

25. This decision is clearly unsound as EB39 clearly demonstrates that the site can be developed, subject to certain design criteria being taken into account. In reaching that conclusion, it is cognisant of the site's proximity to the AONB. In deciding to de-allocate the site, Document EB9 flatly contradicts the conclusions of EB39, although it does not offer any technical evidence to support this change in position. As a result, the decision to de-allocate the site is simply not robust.