

# Stroud District Local Plan Review - Additional Housing Options

## Representations on behalf of Avant Homes

---



### **Introduction**

1. McLoughlin Planning has been instructed by Avant Homes to prepare and submit representations on the 'Stroud District Local Plan Review – Additional Housing Options Consultation October 2020'. This document responds to the questions posed by the Council.
2. Contextually, Avant wishes to draw the Council's attention to the submissions made in January 2020 to the draft Local Plan in respect of its land interests at Dursley and the serious conflict between the Plan's evidence base and the Plan itself in respect of its site. Whilst it is noted that the current consultation does not seek repetition of previous site-specific representations from the earlier Document, Avant consider its representations to remain just as valid now as they did in January 2020.
3. For avoidance of doubt, Avant's site is identified as PS29 Ganzell Lane, Dursley in the Emerging Strategy 2018 Document.

### **Question 1 – Which strategy option(s) would you support, if additional housing land is required?**

4. Avant's position is that additional housing land is required and the strategy options presented are not sufficiently broad enough to encompass all the options available to the Council. In supporting this position, the following should be noted.
5. Paragraph 20 of the NPPF sets out a requirement that strategic policies make "sufficient provision" for new homes (Bullet Point A). In this case, the Plan's housing requirement will be determined by the standard method (SM) calculation. It is well-documented that the SM is currently under review, in light of the recent consultation exercise on the revised methodology. If this maintains a level of housing higher than the current draft plan, then it will be necessary to accommodate that additional development.
6. Table 1 of this consultation sets out the Plan's new housing requirement under the revised SM. It is necessary to highlight that Avant does not agree with Row D of the Table, in terms of the number of units allocated in the Draft Plan (see earlier representations) and there is a need for additional housing allocations over and above what is identified as the potential shortfall in planned housing supply.

# Stroud District Local Plan Review - Additional Housing Options

## Representations on behalf of Avant Homes



7. In making additional allocations, this consultation sets out 4 fixed options (intensification, towns and villages, additional growth point and wider dispersal). In general terms, Avant consider that there is a need for a combination of options. However, conspicuous by its absence is any reference in the Document (or accompanying Sustainability Appraisal) regarding the option for additional allocations at Tier 1 locations (the main towns, including Dursley).
8. As a result, the presentation of spatial options in the document is flawed in that it fails to meet the requirements of paragraphs 31, 32 and 35 of the Framework. These paragraphs when read together set out a requirement for relevant evidence, plans to be tested against a Sustainability appraisal and demonstrate that they are an appropriate strategy, taking into account reasonable alternatives. In this instance, the consultation fails on all three requirements in that the need to accommodate additional development and the opportunities for additional development at Tier 1 locations is conspicuously ignored.
9. In terms of the options available, commentary is as follows:
  - Option A - What evidence is there to support the intensification of existing proposed allocations in the Plan?
  - Option B – The consultation fails to recognise that there are options at Tier 1 locations.
  - Option C – The consultation advances two potential growth points, it is not explicit whether the Plan is seeks a choice between the two or promoting both. In any event, it is clear that the Council is placing increased reliance on the A38 corridor as a development corridor. What evidence is being presented by the Council to support the levels of development on the corridor and that development does not lead to “significant adverse impacts” on infrastructure (e.g. highways).
  - Option D – See commentary relating Options A and B.

**Question 3 - Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?**

# Stroud District Local Plan Review - Additional Housing Options

## Representations on behalf of Avant Homes

---



10. Avant Homes does not support the principle of the Plan making reserve allocations. It considers that such a course of action means that the Plan has actively failed to meet the requirement in paragraph 16(b) that a Plan should “be prepared positively, in a way that is aspirational but deliverable”.
11. The potential presence of reserve allocations in the Plan simply underlines the fact that the Plan is readily recognising that there is the potential for difficulties in the delivery of the allocations which have been made. Avant’s earlier submissions raise a number of concerns about the reliance on large strategic sites, particularly in the south of the District.
12. In terms of resolving the situation, there is clear guidance in the Framework in paragraph 11 about determining applications where a plan is considered to not be up-to-date. The need to undertake an “immediate review” of the Plan presents a complex and unnecessary burden on the Council and the development industry alike. This can be best avoided by ensuring that the Plan is deliverable and sufficiently flexible, in making a number of allocations.

### **Question 4 – Which strategy option(s) would you support, if a reserve site (or sites) is required?**

13. Notwithstanding Avant’s reservations regarding reserve sites in principle, it does not support Options A to E for reasons specified above. There is a need for a further Option to consider additional development at Tier 1 locations.

### **Question 6 – what should trigger a reserve site (or sites) coming forward?**

14. Question 6 underlines the difficulties in designing a policy mechanism for the release of a reserve site. The starting point is that contextually, there must be an under delivery in housing land supply in the District and that the Council is failing to post a 5-year housing land supply figure. As a result, the Council is failing in its duty in paragraphs 59 and 73 to 76 of the NPPF, in particular.
15. In such situations, the Plan will be considered to be ‘out-of-date’ and the presumption in favour of sustainable development will normally be engaged (paragraph 11d). In having reserve sites, the difficulty is that reserve sites may not be in a position to come forward

# Stroud District Local Plan Review - Additional Housing Options

## Representations on behalf of Avant Homes

---



(because of technical or land control issues) at the time when the Plan is considered to be out of date.

16. A second difficulty is how will the Plan decide which site will be released for development? Stroud is a geographically large and diverse district with urban and rural areas with different characteristics. Avant's concern is that any such release could give rise to unsustainable patterns of development.
17. It is considered that the most appropriate course of action is to allocate additional land over and above the SM calculation to provide sufficient robustness in housing land supply.

### **Question 7 – Do you support or object to the development of the sites identified?**

18. Avant advance the following comments on the new housing sites:

#### ***STR065 – Beeches Green Health Centre.***

19. There is insufficient evidence to support the Council's position that the site is capable of accommodating 20 dwellings, plus healthcare and extra care provision. This is a development site in an urban location with a variety of different uses. In addition, the allocation suggests a mix of uses being proposed on the site, not simply residential. In addition, the development of the site. Furthermore, there is no evidence supporting the allocation which would allow the site to come forward and not conflict with the provisions of policy EI6.

### **Question 8 – Are there any other sites that you would like to be considered for future housing development?**

20. In response, Avant wish to reiterate its position that land at its land at Dursley should be allocated for housing development.

### **Question 9 – Do you support or object to the development of the potential growth points identified, or any sites therein?**

21. Avant is concerned about the Plan's continued reliance on large scale 'Potential Growth Points' (PGP) as a means of delivering additional housing development. This concern

# Stroud District Local Plan Review - Additional Housing Options

## Representations on behalf of Avant Homes

---



reflects the fact that the Options Paper specifically excludes additional development at Tier 1 locations.

22. In order for either PGP to be delivered, the timetable for the adoption of the Local Plan will be critical. The Council relies solely on the timetable for delivery set out in the Site Promotion Document prepared by the site promoter and does not undertake any rigorous assessment of whether this is achievable or not. Based on current experience of delays to the Local Plan system caused by the White Paper and as of yet review of Standard Method, the promoter's claim to have the first dwelling delivered on the site by December 2024, is optimistic as it fails to recognise:

- Established research undertaken by Lichfield's in "Start to Finish – How Quickly do Large Scale Housing Sites Deliver" dated 2016 provides useful data on the time taken to deliver a large housing site such as what is proposed.
- Time taken for the preparation and submission of an EIA based application.
- Time taken by the Council for the determination of the application.
- Time taken in respect of the signing of a Section 106 agreement.
- Time taken in respect of the preparation and submission of reserve matters applications and the discharge of any pre-commencement planning conditions.

23. As a result of the above, the Plan's potential reliance on PGP sites, in addition to the other major development sites proposed in the District (see earlier submissions on this point regarding Allocations PS36 and PS37 in particular.