

**Representations to the Stroud District Plan Pre-Submission Plan Consultation (July 2021)**

**On Behalf of [REDACTED]**

**Land to the south of Hawthorn Villa, Dursley, GL11 4AJ.**

**Introduction**

Representations are made about the Stroud Local Plan – Pre-Submission Draft Plan Consultation (Regulation 19, June 2021).

This representation is being submitted on behalf of [REDACTED], owner of Land to the south of Hawthorn Villa, Woodmancote, Dursley is 0.6 Ha. The adopted Stroud Local Plan 2015 shows part of the residential garden of Hawthorn Villa as being not within the settlement development limit and this does not follow any boundary or feature “on the ground” or any evidence base. This representation is to propose a change to the development limit of the settlement to include the garden of Hawthorn Villa and link with a defensible boundary on the ground which is the hedge and fence line to the southeast of the main house this would make for a justified boundary. This representation is to a settlement boundary change in response to Policy CP1 and the Policy Map.

We have previously made representations to the Stroud District Local Plan Review – Draft Plan 2019 Consultation (Regulation 18, November 2019). The previous representation set out that the settlement development limit should be amended. The council have noted our previous submission to the Draft Plan Consultation. Noting in Appendix A – Potential changes to Settlement Development Limits page 134 “Dursley: The Dursley SDL should be amended to include the garden of Hawthorn Villa, Woodmancote as defined by the hedge and fence line to the southeast of the main house.” The council have not provided detail as to the features that would prevent the alteration to the SDL as suggested in our previous representation.

**The Site**



Aerial Photograph of the Site



Aerial Photograph of the Site from 1999



Aerial view of Site and surrounding uses.

The site is located to the South of Dursley and is situated to the edge of the settlement of Dursley, to the rear of Hawthorn Villa. The site is Greenfield land and is currently a paddock. The site is in a prime location for the expansion of the urban edge of the settlement and the site is outside, but adjacent to the Dursley Settlement Development Limit (SDL) and surrounded by development to the north and west.

The site is partially located within the Cotswold Area of Natural Beauty (AONB), however is bordered by residential development on its western and northern edge the boundary of which does not follow any feature on the ground. The site is surrounded by residential development on its western, northern, and eastern edge. In this respect the surrounding character and a large portion of the property are residential in nature and within the development limit of the settlement at this location. The site is in keeping with neighbouring uses and the wider settlement.

The site is also outside of the conservation area for Dursley, it would therefore have but minimal impact to the conservation area, which is already highly residential in nature, there are no listed buildings surrounding the site, with the closest located off Nunnery Lane. The site has no further constraints and is not within a flood zone 2 or 3 as indicated by the Environment Agency flood maps for planning.

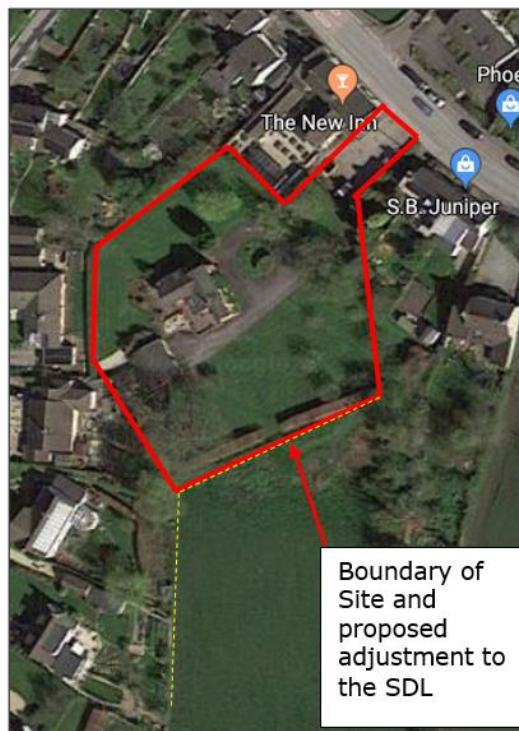
## **Amendment to the Settlement Development Limit (SDL)**

The site is residential and garden land and is at the urban edge of the settlement, the site is mostly within the current Dursley Settlement Development Limit. The proposed modification to the policy is to have entirety of the site within the SDL.

As shown on the below policy map for the Stroud Local Plan (the Black Line - SDL) the SDL cuts through the garden and rear of this property, the intention of this representation is to move the boundary in line with the boundary of the property, so that it is consistent with the applicant's private land ownership shown below in red with the yellow dotted line indicates the altered SDL. The proposed amendments would also ensure the SDL align with features on the ground as is the suggested modification to the policy map put before the examination for the plan to be found sound based on justified reasoning.



*Policy Map for Stroud Local Plan*



*Suggested adjustment to limit to fit property SDL.*

There are several issues that need to be considered in the overall amendment of the Development boundary.

Firstly, there is no clear evidence for why the line has been drawn so tightly to the property, with no clear evidence and without any clear indication as to the obvious boundary of the garden has not been followed. The SDL is also at odds with the AONB boundary. The aerial photograph from 1999 shows that the garden/property boundary has been in place for several years. The residential curtilage of Hawthorn Villa is clearly defined by mature beech hedge, which provides a robust defensible boundary which separates the garden from the adjoining paddock beyond as the land level rises. Many of the other gardens in the Town are also included in the settlement boundary and outside of the AONB this would further indicate an inconsistency and potentially an area on the policy map that should be amended. The map below shows the gardens that have been included within the boundary.

## The site

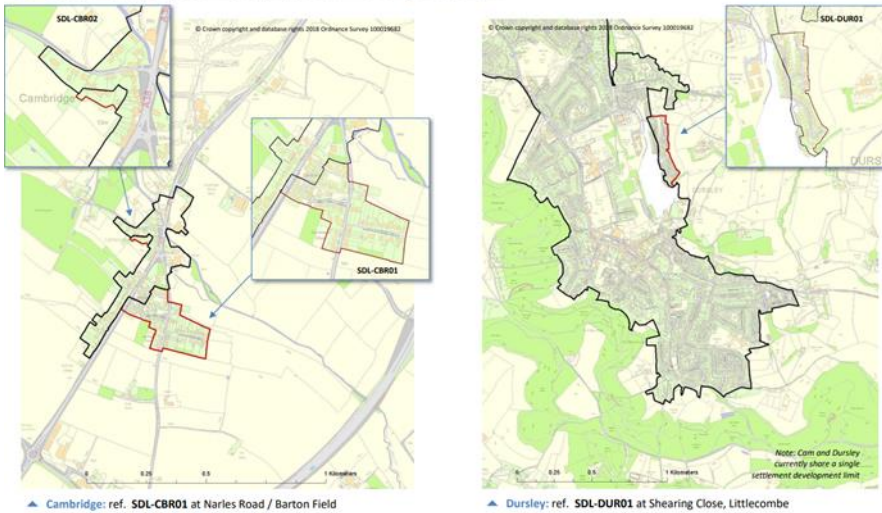


Stroud Adopted Proposal Map 2015

Secondly, the role and function of the settlement of Dursley for Stroud District as a Tier 1 settlement. The Stroud Pre-Submission Draft Plan 2021 Policy CP3 page 55 notes "the settlements set out within this hierarchy all have defined settlement boundaries or "settlement development limits" (SDL), within and (exceptionally) adjacent to which suitable development may be permitted". Dursley is part of the "the district's largest and most populous settlements, each of which benefits from transport infrastructure that enables good access to key services and facilities, with good links to their suburbs and "satellite" communities. They are the primary focus for growth and development, with a view to safeguarding and enhancing their strategic roles as employment and service centres". As such this is a key settlement for growth and housing. With the size, location, and services available to this settlement it is a prime location for future growth.

The SDL of Dursley should be amended to the suggested site boundary in line with the ownership of the property. The site is within a Tier 1 settlement and would complement the existing urban form and is part of the wider spatial strategy for a large portion of the district's growth. Furthermore, the council's Draft Plan for Consultation November 2019 Consultation Report April 2021 does not set out in detail the reasoned justification for the rejections of proposed SDL alterations and stated that "the council has reviewed each of the suggested changes to the settlement limits, assessing the existing development and natural feature characteristics of the locality and following any new development completion."

Note: SDL changes are shown in red. Existing settlement development limits are in black. You can see the existing settlement development limits for all the District's settlements by using our online mapping tool at [www.stroud.gov.uk/localplan](http://www.stroud.gov.uk/localplan).



## Appendix A: Pre-Submission Stroud Local Plan

An application was submitted to the council with the application reference s.20/0349/FUL. The application was dismissed at appeal, the proposed development was for the erection of two detached dwellings (one self-build) with provision for associated parking, garden, and associated works. The Inspector agreed that the proposal would not have a harmful effect on the conservation area and the general location is acceptable for residential development, notwithstanding the landscape concerns. The appeal reference is APP/C1625/W/20/3260430 the main issues for the Inspector were "the effect on the character and appearance of the area, bearing in mind the location of the Cotswolds Area of Outstanding Natural Beauty and the Woodmancote Conservation Area and the suitability of the location of the development, having regard to the policies in the development plan". The Inspector noted in his decision that "the settlement boundary bisects the appeal site, with the northern part within the settlement and the southern part outside. The boundary did not appear to follow any discernible feature on the ground." The Inspector confirmed that the council have specifically drawn the boundary to exclude the relevant part of the garden of No.86, that lies within the AONB, from the settlement. Exclusion from the settlement development limit based on the AONB should not be the only consideration in the alteration of the Settlement Development Boundary given that some settlements are located within the AONB.

## **Conclusion**

This letter for the Stroud District Local Plan Review – Pre- Submission Draft Plan 2021 Consultation (July 2021) demonstrates the site comprises of land in a sustainable location, adjacent to the settlement limit, its services and associated public transport routes.

On this basis, we would urge Stroud District Local Plan Review – Pre- Submission Draft Plan 2021 Consultation to amend the SDL to include the land associated within Hawthorn Villa.