

**Representations to the Stroud District Local Plan Review
On Behalf of [REDACTED]
Land to the south of Hawthorn Villa, Dursley, GL11 4AJ.**

Introduction

Representations are made with regard to the Stroud District Local Plan Review – Draft Plan 2019 Consultation (Regulation 18, November 2019).

This representation is being submitted on behalf of [REDACTED], owner of Land to the south of Hawthorn Villa, Dursley (the Site) is 0.6Ha.

This representation is to proposing a residential allocation in the paddock (the Site) to the south of Hawthorn Villa for circa. 10 dwellings.

The Site



Aerial Photograph of the Site

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.

Dursley is a very large settlement and is one of the District's historic market towns. Dursley has a strong 'strategic' retail role as one of the District's five town centres. It offers a very good level of local community services and facilities (GP, dentist and pharmacy, post office, primary schools and pre-schools, places of worship, pubs, town hall/community centre, sports/playing fields and playgrounds) and has an important role in providing a diverse range of 'strategic' services and facilities to a wider catchment (hospital, banks, secondary school and 6th form, library, swimming pool and leisure centre). Dursley has along with Cam) the best access to key services and facilities of anywhere in the District. The town has an important employment role and also functions as a 'dormitory' settlement and strategic service centre.



Policy Map for Stroud Local Plan

The Site is located within the Cotswold Area of Natural Beauty (AONB), however is bordered by residential development on its western and northern edge. In this respect a housing allocation in this location would be in keeping with the neighbouring uses of the area and Site boundary and visual impact of any residential development (which

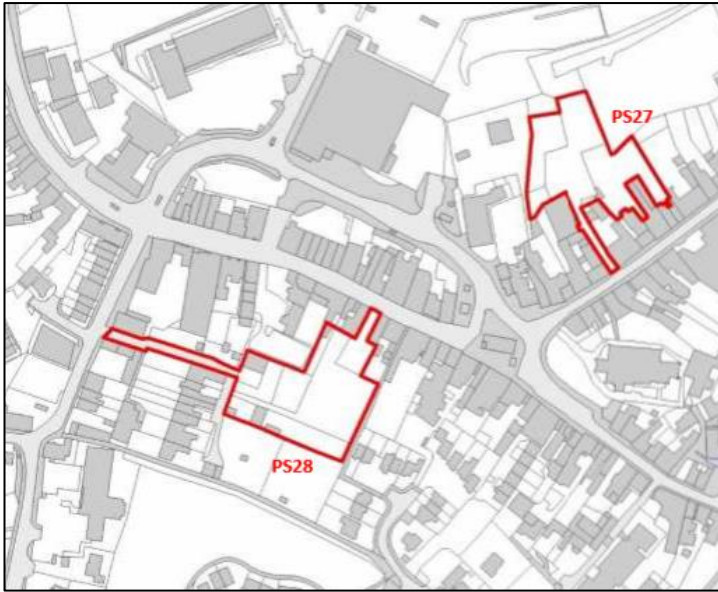
wouldn't be "major" in AONB terms) could be mitigated through layout, design and landscaping.

The Site is also outside of the conservation area for Dursley, it would be therefore have 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 of 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.

Residential Site Allocation Proposal

The role and function of the settlement of Dursley for the Stroud District is as a Tier 1 settlement. The Stroud Draft Plan 2019 Policy CP3 page 51 notes "*the settlements named in this hierarchy all have defined settlement boundaries or "settlement development limits" (SDL). Suitable development may be permitted within and (exceptionally) adjacent to SDLs, in accordance with other detailed policies in the Plan*". This Site would therefore be suitable for allocation within the Draft Local Plan.

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 clear that more development should be allocated to Dursley. As it stands only two allocations are proposed within the Draft Plan (PS27 1- 25 Long Street for town centres uses & PS28 land at Prospect Place for up to 10 dwellings), which is limited amount of proposed housing for the size and function of the settlement and the amount of housing required over plan period.



Stroud Draft Local Plan Dursley Allocations

Policy C2 page 48, states “*Stroud District will accommodate at least 12,800 additional dwellings, to meet the needs of the District for the period 2020-2040*”. This Site would help to meet that need and is suitable, available, achievable and deliverable.

Housing Delivery

As quoted in the Local Plan Review “currently, the Government requires the Local Plan Review to provide for at least 638 new homes per year”, through the Standard methodology. This is a 40% increase from the figure in the current Local Plan of 456 homes per year. Although 564 homes were built in the District last year, in order to meet the higher target over the 20 year plan period it will require the Local Plan to identify land for at least 12,800 new homes. Paragraph 59 of the NPPF makes it clear that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land come forward where it is needed...” This Site would contribute towards meeting this local and national housing need.

Paragraph 68 of the NPPF supports development of small and medium sites and recognises the important contribution that these sites can have to a five-year supply. This site would be classified as a small to medium sized site and would therefore meet one of the objectives set by Government for Local Authorities to allocate within their plans.

The Stroud District Settlement Role and Function Study Update (2018) highlighted the fact that housing accessibility and housing affordability varies markedly across different parts of the District. Effects on social cohesion and the vitality of communities may be particularly acute in settlements that have seen low levels of housing growth in recent decades, including some communities in the AONB, many of which are highly constrained such as Dursley. The study notes a core aim is to “*prioritise growth at the District’s larger and better-resourced settlements*”. Therefore, it has already been

recognised that *“it should be the case that a higher proportionate growth (above the District average) will be seen at higher tier settlements”* such as Dursley.

The Site should be allocated for housing within the Stroud District Local Plan Review – Draft Final Plan 2019 Consultation as residential allocation. The Site is adjacent a Tier 1 settlement and would complement the existing urban form, fulfilling key goals of the wider spatial strategy, housing need and prioritising growth in the Districts larger settlements.

Conclusion

This letter for the Stroud District Local Plan Review – Draft Plan 2019 Consultation (December 2019) demonstrates the Site comprises of land in a sustainable location, adjacent the settlement limit, its services and associated public transport routes.

On this basis, we would urge Stroud District Local Plan Review – Draft Plan 2019 Consultation to allocate the land for housing. This Site would help to meet housing need and access to services and facilities across the District and is suitable, available, achievable and deliverable.

We look forward to your response on these matters in due course as part of the on-going consultation process.

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Introduction

Representations are made with regard to the Stroud District Local Plan Review – Draft Plan 2019 Consultation (Regulation 18, November 2019).

This representation is being submitted on behalf of [REDACTED], owner of Land to the south of Hawthorn Villa, Woodmancote, Dursley (the Site). The adopted Local Plan 2015 shows part of the garden of Hawthorn Villa as being not within the settlement development limit and this doesn't follow any particular 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.

The Site

The Site is located to the South of Dursley and is situated to the edge of the settlement of Dursley. Dursley is a very large settlement and is one of the District's historic market towns. 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.



Aerial Photograph of the Site



Aerial Photograph of the Site from 1999

The Site is partially located within the Cotswold Area of Natural Beauty (AONB), the boundary of which doesn't follow any particular 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

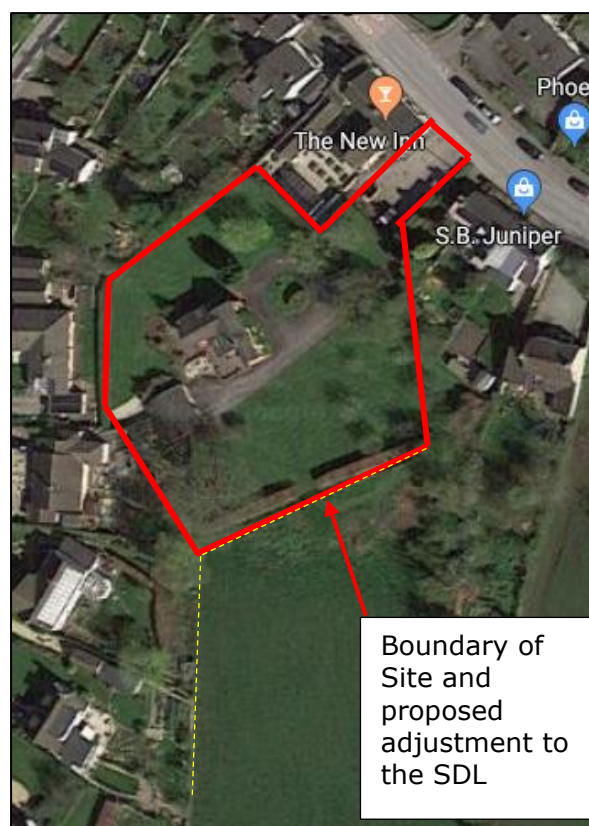
nature, there are no listed buildings surrounding the Site, with the closest located off of Nunnery Lane. The Site has no further constraints and is not within a flood zone 2 or 3 as indicated by the Environment Agency flood maps for planning.

Amendment to the Settlement Development Limit (SDL)

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 applicants 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.



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 aerial photograph from 1999 shows that the garden/property boundary has been in place for a number of years.

Secondly, the role and function of the settlement of Dursley for Stroud District as a Tier 1 settlement. The Stroud draft plan 2019 Policy CP3 page 51 notes "*the settlements*

named in this hierarchy all have defined settlement boundaries or "settlement development limits" (SDL)." 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 within the Stroud District Local Plan Review – Draft Final Plan 2019 Consultation. 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, there is no existing evidence base for up to date SDL's which should be considered in line with the preferred options for the Local Plan Review and future spatial strategy.

Conclusion

This letter for the Stroud District Local Plan Review – Draft Plan 2019 Consultation (December 2019) demonstrates the Site comprises of land in a sustainable location in the settlement within close proximity to its services and associated public transport routes.

On this basis, we would urge Stroud District Local Plan Review – Draft Plan 2019 Consultation to amend the SDL.

We look forward to your response on these matters in due course as part of the on-going consultation process.