



#### STROUD DISTRICT LOCAL PLAN REVIEW

#### **Written Statement**

In response to the Matters, Issues and Questions for the Examination in Public, Matter 2
On behalf of Mr. Peacey

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## 1.0 Introduction

- 1.1 SF Planning have prepared this written statement in response to the Inspectors Matters, Issues and Questions produced to guide the Examination in Public into the Review of the Stroud Local Plan.
- 1.2 The following written statement comments on the soundness of proposed changes the settlement development limits around Dursley, and in particular responds to Matter 2, Issue 2, Question 20, specifically parts a and d.
- 1.3 In response to this question, this statement suggests that further changes are required to ensure the settlement development limit around Dursley follows a sensible land pattern and defensible boundaries on the ground which can be implemented, leading to the settlement development limit in this area being more effective and robust.
- 1.4 Our clients land which is in question here, consists of a residential dwelling and attached garden at Hawthorn Villa, 86 Woodmancote, Dursley.

### 2.0 Question 20

2.1 Question 20 of Matter 2, Issue 2 asks:

Settlement development limits (SDL) or boundaries have been identified. Appendix A details proposed changes to some existing SDL on the policies map.

- a. Is it clear how SDL have been defined and are they justified and effective?
- b. Are the reasons for the proposed changes to the SDL clearly explained? Do
  they just incorporate completed development into the settlement boundaries?
   Do any of the proposed changes involve land within the AONB?
- c. It appears that the SDL proposed changes do not extend to include some committed development sites currently under construction and the proposed site allocations within the Plan. Whilst some explanation has been provided in the Council's response to the representations, we remain concerned that this approach would create policy conflicts for decision-makers when determining future planning applications for these sites, as they would be outside the defined SDL. Can the Council provide more detailed clarification on why they consider their approach is sound?
- d. Are any changes to the SDL for some settlements, as suggested through the representations, necessary for soundness?

#### Response:

2.2 In response to part (a), we do not consider the Settlement Development Limits (SDL) as currently proposed would be effective and have not been justified. This response specifically relates to the SDL which has been drawn around Dursley and across our clients land at Hawthorn Villa, Dursley.

- 2.3 The settlement development limit in this location has been carried over from the adopted 2015 Local Plan, and does not appear to have been reviewed, despite representation having been made to earlier versions of this plan review.
- 2.4 The SDL cuts across the garden of our clients land, and thereby not relating to any feature on the ground, which would make it difficult to define when used for decision making purposes. The following images (figure 1) show the SDL on a satellite image of the site, compared to the site boundary, including the residential garden attached to the property (this can also be seen in figure 3.



Figure 1 SDL and extent of site

2.5 There is no clear evidence why the line of the SDL has been drawn in this way, it follows no landform or defensible boundary on the ground to give rise to this line, and follows no other boundary in this area, including that of the Area of Outstanding Natural Beauty.

2.6 The residential curtilage is defined by a boundary of mature beech hedge, this would be a sensible settlement development limit to follow, and can clearly be identified in figure 2.

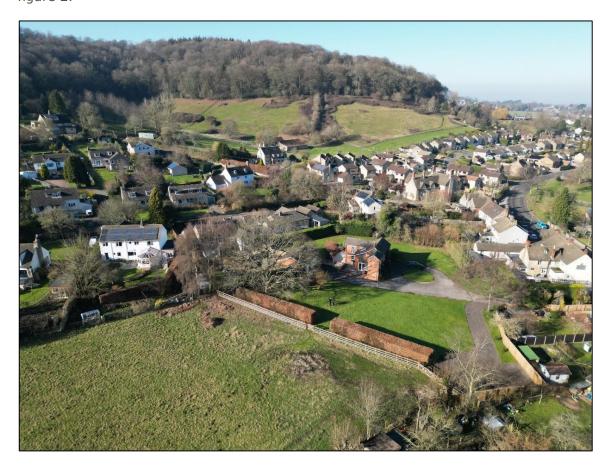


Figure 2 Drone shot, February 2023: Hawthorn Villa



Figure 3 Blue line- extent of residential garden, red line approximate SDL line

- 2.7 The current proposals are at odds with neighbouring properties in this area, which clearly have the full extent of residential gardens included within the SDL.
- 2.8 In response to part (d) of the question, the tests of soundness include being justified and effective, both points we argue (as above) the SDL in this specific location is not.

# 3.0 Summary and Conclusion

- 3.1 For the reasons of the currently proposed SDL not being effective nor has the proposal been justified we do not feel that the SDL as proposed is sound.
- 3.2 We respectfully request that the settlement development limit be amended to include the full site area of this site, which would align with the full residential curtilage of the site, and thereby making it easier to define on the ground, and more effective.
- 3.3 We confirm that we wish to appear at the hearings, to take part in the discussion around this question, as has been confirmed with the Programme Officer.
- 3.4 We are happy to provide any further information that might be helpful to the Inspectors around this site/ subject.

**Word Count: 845** 



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