

Dursley NDP Regulation 14 Comments Response Schedule

This schedule contains detailed comments received from both statutory consultees and residents/visitors/businesses as part of the Regulation 14 consultation for the Dursley NDP. It also provides the NDP Steering Group response and identifies changes made to the plan to take account of the points raised.

Other representations both verbal and written from statutory consultees and residents/visitors/businesses and the NDP Steering Group response are captured in two separate spreadsheets.

Comments	NDP Steering Group response	Amendment to NDP?	Log of changes
<p><u>Cam Parish Council comments -</u></p> <p>An excellent NDP with attractive logo and design - although there are a few layout issues and typos. I understand that as this is a draft these will probably be eliminated but have highlighted some here in hope that extra proof reading is always helpful.</p> <p>First impression notes:</p>	Noted with thanks	None	N/A

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<p>P 12 Explanation THESE PARAGRAPHS APPEAR TO CONTRADICT EACH OTHER</p> <p>“Dursley is one of the district’s main towns, and the Local Plan proposes that it should provide significant levels of residential and employment development over the plan period (to 2031)”</p> <p>“, only Cam is a focus for future strategic growth, with 450 dwellings and 12 hectares of employment land allocated there in the Stroud Local Plan (the North East Cam urban extension). Although this development is in Cam, it will impact on Dursley, with new residents likely to use the local facilities and services here”</p> <p>The Stroud Local Plan proposes that Dursley should provide significant levels of residential and employment development over the plan period (to 2031).</p>	<p>Wording is in line with Stroud Strategy for Cam/Dursley. But agree wording is a bit clunky, suggest amending to "However, only Cam' with "Adjoining Cam"</p>	<p>Minor amend</p>	<p>Amended</p>
<p>P12 Land in the AONB adjoining Dursley is not needed to meet housing requirements, and national policy gives AONB land the highest status of protection for its landscape and scenic beauty. Therefore, planning permission for development in the AONB will be refused, unless exceptional circumstances in the public interest can be demonstrated <i>be demonstrated</i>, in the public interest. REPEATED</p>	<p>Typo on p12 noted</p>	<p>Delete repeated text</p>	<p>Amended</p>

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P13 - Map is difficult to understand. There is no explanation about the pink areas or the light purple area of North Cam.	Add pink strategic site allocation to key	Minor amend to key	Amended
P15 - Four key brown field locations within the settlement boundary, outside of the AONB, which do not currently have consent for re- development, have been identified as having potential to contribute to improvements to the town centre, provide aesthetic improvements, and enhance key gateways into the town. <i>Explanation needed to explain this latter part of the sentence.</i>	Minor text amend replace 'enhance key gateways into the town' with "and enhancements in 4 key locations,"	Minor amend to text	Amended
These combine with other key policy principles supported by the NDP to form the NDP Development Strategy for Dursley, as summarised in Figure 4. (ILLUSTRATED NOT SUMMARISED)	Replace word "summarised" with "illustrated"	Minor amend to text	Amended
Paragraph 5 As is repeated	Typo noted	Delete repeated text	Amended
P18 - Doesn't this need updating?	Purchase of Reliance House, Long Street by DTC only completed in December during this consultation.	Plan has been updated.	Amended

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<p>P25 first para? policies included in the Neighbourhood Development Plan are all planning policies, which will be used to help determine (HOW) planning applications (ARE ASSESSED) within the Dursley Plan area. These (POLICIES) aspects will be the subject of an independent examination by a Planning Inspector, followed by a community referendum.</p>	<p>Minor amends suggested as follows:</p> <p>The planning policies included in this Neighbourhood Plan will be used to determine planning applications within the Dursley Neighbourhood Area.</p> <p>The planning policies will be the subject of an independent examination, followed by a community referendum.</p> <p>Each planning policy has a unique reference number which can be quoted when comments are made on planning applications, and which will be referred to by planning officers.</p>	<p>Minor amends to text</p>	<p>Amended</p>
<p>P44 Photo of library required - I see there is one later</p>	<p>There is a photo of the library.</p>	<p>None</p>	<p>N/A</p>
<p>P45 - should reflect the positive characteristics of the place and must be locally distinctive. (Good)</p>	<p>Noted with thanks</p>	<p>None</p>	<p>N/A</p>
<p>p54 Map unreadable</p>	<p>Map replaced</p>	<p>Map replaced with higher resolution</p>	<p>Amended</p>
<p>P61 last para GH? (I now see it is Growth Hub but for clarity best to continue to spell out for readers not familiar with the language)</p> <p>Sentence construction- not quite clear at start</p>	<p>Amend GH to say "Growth Hub"</p>	<p>Minor amend to text</p>	<p>Amended</p>

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P62 v Good idea!	Noted with thanks	None	N/A
P63 Project H last para - should that para be in this column?	Delete "(as shown on Figure 19)" but leave in remaining text	Minor amend to text	Amended
<u>Pre-submission Draft Version. November 2017</u> A concise and informative introduction to the NDP and the work carried out by the steering group over the over the 3 years.	Noted with thanks.	None	N/A
<u>Vision and objectives for Dursley</u> The photos and maps present a view on how you want to sympathetically build a future for Dursley	Noted with thanks.	None	N/A
<u>Dursley town Centre Planning Policy TC1</u> As Above	Noted with thanks.	None	N/A
<u>Dursley Town policy E1 E2 Economy and Local Businesses</u> Everyone is unsure about the future with BREXIT in mind, employment and will businesses be able to survive and prosper. It is good to see it you are seen to be mindful and given considerable thought. The photos of locals at work are a nice touch.	Noted with thanks.	None	N/A
<u>Dursley Landscape Character Assessment</u> Well presented, laid out in detail, photos enhance the true character of Dursley and the surrounding landscape	Noted with thanks.	None	N/A

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Comments from Stroud District Council. Section 3 - add more explanation and context to preamble text in this section.	Addition text in para 1 added, which makes reference to the settlement hierarchy.	Minor amend to text	Amended
Section 3 para p12, para 2 Add more Local Plan context e.g. mention settlement hierarchy Para 4 repeats	Addition text in para 1 added, which makes reference to the settlement hierarchy. Delete repeated para 4	Minor amends to text	Amended
Delete para 7 as it could date the NDP	Delete para 7	Minor amend to text	Amended
Para 8 amends suggested	Amend para 8 to cross refer to national policy and Stroud policy ES7 and emphasis given to the importance of Dursley's AONB setting.	Minor amend to text	Amended
Section 3 - p15 Development context para 5 anti-development tone	As above this para was deleted	Minor amend to text	Amended
Section 4 p21 Not clear why outside general policies section	A separate chapter on the Town Centre was agreed early on, there is no material change made by moving this section - so no change.	None	N/A
Section 4 p21 para 3 - include a more detailed cross reference	Replace "For more detailed information see the evidence base, which includes an update note (March 2017)." with "For more detailed information see the <i>Dursley Urban Design Framework Update Note March 2017.</i> "	Minor amend to text	Amended

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Section 5 p26 para 2 - amend reference to wooded hillsides	Amend text to delete "two" and replace with "The town is largely surrounded by"	Minor amend to text	Amended
<p>Section 5 p26 para 3 and 4 - include references to key documents in evidence base</p> <p>Section 4 p26 - Subjective statement about Cotswolds way and reference to green space benefiting wellbeing needs citation</p>	<p>Remove reference to Glos Wildlife Trust as evidence and replace with Dr Kathy Meakin – NDP Biodiversity and Wildlife Report 2014</p> <p>Add underlined "is considered <u>by local people</u> to provide some of the best..."</p> <p>Citation should be page 5 of Environment Report 2014.</p>	Minor amend to text	Amended
ES1 Green Infrastructure policy wording - suggested refinement	<p>Amend para 3, agree to main amends with some changes to refer to maintenance needs.</p> <p>Development proposals on land either within or adjoining Dursley's Green Infrastructure Network (as shown on Figure 7) should demonstrate how they will maintain, and where possible, enhance green links. Development proposals which propose a net gain to Dursley's Green Infrastructure work will be supported, where the infrastructure can be well maintained, and where the proposals are consistent with other policies in the plan.</p>	Policy wording amend suggested.	Amended
ES2 Ancient woodlands - suggested refinement	Amend as suggested to delete "Planning permission will be refused for" and replace with "will not be supported" after "ancient woodland"	Policy wording amend suggested.	Amended

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ES3 Key Views and Landscape	Amend suggested to shorten policy wording. Only agreed to remove para 5 - the remaining policy wording is retained unchanged.	Delete para 5	Amended
ES3 p32 para 1 - suggested amend	Delete word "glimpsed"	Delete word	Amended
P35 para 3 - suggested amend	Disagree with change as local people won't know what "townscape" means	None	N/A
p35 para 3 - suggested amend	replace "major work providing centres" with "major employment centres"	Minor amend to text	Amended
p35 para 4 - amend text or add citation	replace "there is a call" with there is "perceived demand" and include citation to: 'Housing affordability is an issue for people looking to buy or rent privately in Dursley' (GRCCs Dursley housing report 2015)	Minor amend to text	Amended
p35 para 5 - amend text	Replace "topography" with "landscape constraints" Replace "development locations" with "Potential Areas for Enhancement"	Minor amend to text	Amended
p37 Policy H1 - suggested wording refinements for clarity and simplicity	Don't agree with policy amends, this policy has been through a health check.	None	N/A
p37 H2 - refine text	No change sought	None	N/A

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p37 final para	<p>Add reference to (Neighbourhood Plan Consultation Report, 2018).</p> <p>Remove reference to Policy T2 .</p>	Add evidence reference.	Amended
p38 para 7 - delete first sentence	This was added for clarity for the community - no change agreed.	None	N/A
E1 p39 - rewording suggested for clarity and to better link to the Local Plan	<p>Amend to include most of the suggested amends, but not losing the detail in clause 1</p> <p>Changes of use of existing business premises away from employment activity will be supported where:</p> <p>i) It can be demonstrated that the existing use is no longer economically viable (i.e. that the site has been appropriately marketed for a reasonable price for at least one year for a suitable employment or trade service use)</p> <p>ii) The site is allocated as part of a mixed use development</p>	Amends to policy text	Amended
P41 para 1	<p>Replace para 1 with</p> <p>The Local Enterprise Partnership has a growth hub service which focuses attention on new business start-up and growth of existing companies.</p>	Minor amend to text	Amended
p41 para 2 and 3 - evidence needs to be cited.	Add reference to Economic Development evidence listed in section 6.	Minor amend to text	Amended

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p41 E3 Town Centre - rephrasing suggested	<p>Re phrase wording as follows:</p> <p>Development which seeks to maintain and enhance the viability and vitality of Dursley Town Centre, will be supported.</p> <p>Other minor text improvements to para 2 to make it read more like a planning policy.</p>	Amends to policy text	Amended
p42 Visitor Accommodation - add ref to design policies	Delete bullet i) as repeats policy D1 - which is more detailed.	Simplification of policy text	Amended
P43 Character and Design	<p>Add para 1 after which "in the views of Dursley residents" at end of para (Dursley NDP Consultation Report, 2018).</p> <p>Add ref as above at the end of para 6.</p>	Minor amend to text- to add citation	Amended
P45 para1- suggested amend	<p>delete final sentence of para 1 and replace with:</p> <p>Once made, the NDP will be supported by this evidence base.</p> <p>Suggested changes to Policy D1 by SDC not agreed by SG.</p>	Minor amend to text	Amended No Amends to Policy D1.

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P50 SF1 Policy - suggest deleting para 1 and replacement wording	<p>Delete policy para 1 and 2 and replace with</p> <p>"Development which involves the loss of any of the community facilities identified will not be supported unless, where the criteria below are satisfied."</p> <p>Note in explanation that the dental practice and the options are a use class which has some permitted development rights at present.</p> <p>Don't agree to remove completely as PD rights change fairly regularly, likely to change again within the life of the NDP.</p>	Minor amend to policy text and preamble	Amended
P53 para 2 - add reference	<p>Add reference to infrastructure audit by name in supporting text :</p> <p><i>Infrastructure Information Report</i></p>	Minor amend to text	Amended
SF2 - LGS policy	<p>Reference to NPPF to be retained as it is included in many other made NDP policies and Local Plan policies.</p> <p>Add list of Local Green Spaces as follows:</p> <ol style="list-style-type: none"> 1. Kingshill House Play Park 2. Highfields Play Park and Field 3. Cambridge Avenue Play Area 4. Land off Acacia Drive 5. Land off Hardings Drive 6. Long Street Town Green 7. Union Street Green 8. Holywell Orchard 	Add list of LGS to policy wording	Amended

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p55 - add citation para 2	Add reference 'Cam and Dursley Station Travel Survey Reporting and Recommendations. Final Report'	Minor amend to text	Amended
p55 para 3 - text amends	Leave text as is - it is not pedestrianised formally, but the surface treatment has the effect of a pedestrianised feel	None	None
P57 Car Parking T1	No amend suggested - as the intention of the policy is to cover the entire parish not just the town centre	None	None
p57 T2 - simplify policy title/amend wording	No change sought - title change non-essential and has a knock on change to much of the BCS etc. Amend text : Development proposals, which include, where possible footpath and cycle links to improve access to green space, the town centre, wider countryside and Cam and Dursley Train Station. will be supported."	Amend to policy wording	Amended

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<p>Luke and Carol Wilson.</p> <p>We are aware that the format of our response does not fit but would still like to submit the following document called 'Ferney Submission 3 (with photos).pdf' as well as a .docx version for you to use the pictures. Sometimes the .docx can go a wrong so we have submitted both.</p> <p>In summary we think that the Neighbourhood Plan has insufficient detail when describing sensitive areas such as Ferney especially with regards to Planning decisions. We are prepared to do further research and provide any assistance the council would like on this subject.</p> <p>Document containing photos and descriptions of key characteristics of Ferney cul- de-sac.</p>	<p>Thank you for sending in this detailed information and photos about Ferney.</p> <p>The NDP policy D1 on Character and Design refers specifically to "local evidence" of character and design being taken into account when planning decisions are made.</p> <p>The document sent in for Ferney could be added to the evidence base for the Dursley NDP.</p> <p>However, making specific changes to the NPD itself to just relate to Ferney, and no other area/street is not possible. Any reference to one area necessitates a detailed street by street assessment of the whole town. The current Urban Design evidence is more strategic that this, but it is a good basis for considering character in the NDP.</p> <p>In future should a further more detailed design assessment for the town be undertaken, this Ferney document could be brought into a more comprehensive Dursley wide character assessment. If and when this was produced policy D.1is flexible and would enable this (or any other new design/character evidence or assessment) to be utilised in the consideration of planning applications.</p>	<p>Refer to this Ferney Character review in the background documents section of the NDP.</p> <p>This document could then be added to the website.</p>	<p>Amended</p>

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<p>Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer level comments to make.</p> <p>Transport Comments</p> <p>The key observation we would make is that the NDP could refer to the Adopted Gloucestershire Local Transport Plan, and particularly to the issues and proposals raised in its Connecting Places Strategy (5) broadly covering or affecting Stroud district see http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/connecting-places-strategies-cps/ .</p> <p>Dursley sits within an important multi-modal transport corridor, and new development may both benefit from this and support increased local connectivity through its careful design and layout which the NDP can play an important role in securing. As part of this corridor the railway station plays an important role in providing public transport opportunities for people wishing to travel to Bristol and beyond as well as Gloucester and Cheltenham to the north. As such it helps reduce congestion on the local and strategic road network. Whilst the station sits outside of the Town Council area its</p>	<p>A reference to the Gloucestershire Local Transport Plan will be added to the evidence base for the NDP.</p> <p>Noted, this link is noted in the overall development strategy section which includes Cam/Dursley connections including the greenway and Cam Railway station.</p> <p>Noted Dursley Town Council welcomes this and look forward to working with GCC on transport matters including the projects identified in the NDP.</p>	<p>Add to evidence base list at the back of the NDP.</p> <p>None.</p> <p>None.</p>	<p>Amended</p>

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<p>Ecology Comments <u>SEA/HRA Screening advice for the Plan</u> The views of the District Council on Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) should be ascertained if not already. Looking at biodiversity alone the need for a SEA of the draft version of the NDP appears unlikely. Our conclusion is also that a HRA</p> <p><u>County Council Ecology Observations on the Plan Content</u> Although the supporting text mentions the AONB and the ancient woodlands present it does not give reference to locally re-designated Key Wildlife Sites such as Hermitage Wood, Gravelpits Wood and Dursley Woods. Further details on the Key Wildlife Sites plus notable species and habitats are available from the GCER at http://www.gcer.co.uk</p> <p>There are two general objectives of relevance to biodiversity under an 'Environment & Sustainability' theme and these can be easily supported. Green space (infrastructure) and landscape character are being given high importance in the plan. The proposals have some consistency with the Gloucestershire Local Nature Partnership's Strategic Framework for</p>	<p>Noted, an SEA/HRA screening has been undertaken, a full SEA/HRA is not required.</p> <p>Add reference to these key wildlife sites (by name) in the Green Infrastructure preamble text.</p> <p>Add reference to the GCER website in the evidence base list in the NDP.</p> <p>Add reference in evidence base</p>	<p>None.</p> <p>Add references to this document in pre-amble text to Green Infrastructure section and add reference in evidence base.</p> <p>Add references in evidence base</p>	<p>N/A</p> <p>Amended - some minor tweaks to wording to fit onto one page</p> <p>Amended</p>

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<p>We do not have any compelling reasons to recommend any change to the wording of the NDP policies which seem to fit in well with District and County objectives. They cover green infrastructure, ancient woodlands and landscape.</p> <p>I look forward to being kept informed of future progress regarding this matter. If you would like to discuss any of the points raised above please do not hesitate to contact me.</p>	Noted, with thanks.	None.	N/A

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<p>Bell Cornwell - Land at Uley Road</p> <p>SHLAA Ref DUR013</p>	<p>Dursley TC noted that Stroud has commenced a Local Plan review; however, at issues and options stage this has virtually no weight in planning terms. The Town Council is in dialogue with Stroud District Council about the Local Plan.</p> <p>It should be noted that the changes requested by Bell Cornwell to the Stroud Council SALA must be actioned by Stroud DC, they cannot be made via the NDP.</p> <p>Furthermore, changes to the Stroud Local Plan development strategy, are matters of a strategic nature (as confirmed in your letter, and as confirmed by Stroud DC). National policy requires that an NDP must be non-strategic in nature.</p> <p>Stroud Planning Policy team have been clear that the adopted Stroud Local Plan policy does not require Dursley to allocate additional land for housing, and in particular it does not require greenfield sites to be developed. If this policy basis appears to be likely to change through the Local Plan review, Dursley Town Council will work with Stroud DC to refine the policy approach. Such a strategic policy change could potentially trigger a NDP review, however it may be that key issues are instead addressed in the Stroud Local Plan policies.</p> <p>Dursley TC and NDP group have met Bell Cornwell and representatives of this site as part of the NDP development, and have considered the potential for this site with interest. We note the content of your latest submission to the Reg 14 consultation.</p> <p>The NDP includes general</p>	None.	N/A

Dec 2017

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Comments from Tracy Organ Well done and thank you for all the hard work that you and the steering group have put into this. (T.Organ]	Noted with thanks.	None.	N/A

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<p>Character</p> <p>Dursley has radically changed with significant and tangible increases in people and traffic. Once can never protect the character of a relatively small Cotswold market town, whilst allowing it to get bigger and bigger. The two are incompatible. Scientific studies show that the most sustainable way for people to live is actually in cities, therefore extra people should be housed in cities not by concreting over the farmland. I look forward to a time when policy makers are brave enough to seriously tackle the issue of global human population increase (reasons and solutions).</p> <p>(T.Organ]</p>	<p>Noted. The NDP does not propose any additional development beyond the town limits in agricultural land.</p>	<p>None.</p>	<p>N/A</p>
<p>Green Cycle Way (T.Organ]</p>	<p>Noted. The NDP supports the delivery of the Cam and Dursley Green Cycle Way and associated cycle infrastructure.</p>	<p>None.</p>	

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Employment (T.Organ]	Noted. The NDP supports the provision and protection of local employment sites within Dursley. The NDP does not have jurisdiction in respect of Cam,	None.	N/A
Train Station (T.Organ]	Noted. The NDP supports the delivery of the Cam and Dursley Green Cycle Way and associated cycle infrastructure. The NDP also supports other sustainable travel modes including bus connections to Cam and Dursley station,	None.	N/A
Pollution (T.Organ]	Noted. However the NDP cannot contain policies on pollution as this is not a matter that can be implemented through a planning application. The traffic impacts of new development will be assessed in line with National Planning policy to make sure there is no significant harm being caused.	None.	N/A
Parking Standard (T.Organ]	Support for the local parking requirements is noted	None	N/A

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Allotments (T.Organ]	Noted. Unfortunately National Planning Policy does not allow for specific minimum sizes of green space to be required as part of new development. However, the character policy in the NDP can be used to justify larger gardens so that new development is in keeping with local character.	None	N/A
Self-Build (T.Organ]	Support for the self-build policy is noted	None	N/A
AONB (T.Organ]	Noted. Protection for the AONB and its setting is enshrined in National Planning Policy.	Add importance of AONB landscape designation.	Text in the plan which refers to the Cotswold AONB has been strengthened to reflect the importance of this national landscape designation.
Cotswold Way/Tourism (T.Organ]	Noted. A policy on the Cotswold way is included in the NDP.	None	N/A
Equestrian Development (T.Organ]	Noted. However most equestrian and agricultural development has development exemptions so in many cases planning permission is not required. It is therefore difficult to have any impact on this though an NDP.	None	N/A

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Agricultural Land (T.Organ]	Noted.	Option to include reference to Agricultural land grades around Dursley high grade agricultural land is protected from development considered - however this is already a SDC policy, so it is not necessary.	N/A
Green Infrastructure Policy (T.Organ]	Noted, This is the intention behind the Green Infrastructure corridor which protects linear features and a buffer around them so they can remain functional habitats. Similar policies have been used successfully in NDP and Local Plans to protect environmental assets.	None	N/A
Brownfield and Underused sites (T.Organ]	Noted. This is entirely in keeping with the NDP approach.	None	N/A