

Local Plan Review Consultation

Key Issues

Question 1.0a

Have we identified the top 5 issues for you?

It would be good to see a reference to the benefits and importance of supporting the local economy in the top 5 issues as the provision of local jobs can help to remove and/or reduce the need for out-commuting.

Question 1.0b

Do you agree with the ways we intend to tackle these issues?

The top 5 issues are all very important.

With reference to issue 1 and the focus for concentrating development at locations where good access to services is currently available, it is essential that additional services are provided in tandem with new housing development and that the existing local population is not adversely affected by the increase in demand for these services that the residents of new housing will inevitably have (as stated by communities at the Issues and Consultations consultation in Autumn 2017 and restated in the emerging strategy November 2018).

Given the relevance of The Cotswold Area of Outstanding Natural Beauty and the Cotswold Way National National Trail to the Stroud District in terms of the landscape, environment and contribution to the underdeveloped local tourism economy, it really should be mentioned within Issue 2 and/or 4.

Local Economy & Jobs

Question 2.1a

Do you agree with the ways in which the emerging strategy intends to support the local economy and the creation of jobs?

We welcome the range of measures which the emerging strategy will help to deliver in support of the local economy and jobs.

These are aligned with and supported by relevant policies (see below) within the Dursley Neighbourhood Development Plan 2018.

Planning Policies E1, Safeguarding Employment Sites, E2, Encourage Start-up and New Businesses, E3, Town Centre, and E4, Town Centre.

Question 2.1b

Do you support an alternative approach? Or have we missed anything?

To avoid the unnecessary loss of employment land, the 'regeneration of under-utilised sites or low value employment sites for other uses' should be tightly controlled and where possible mixed use considered to avoid complete loss.

Small businesses are the most significant sector within Dursley. These enterprises range from the self-employed individual working from home to small businesses providing employment for 1 or 2 people. It is important that the plan has policies which support businesses at all stages of their development.

Assisting businesses with their creation, development and expansion is an important factor in maintaining a vibrant local economy, having flexible sites of varying sizes is a key objective.

As well as 'opportunities to foster ongoing employment-education links', this should also include opportunities for partnership working, developing business-business links/networks and the 'growth hub' service.

Our Town Centres

Question 2.2a

Do you agree with the ways in which the emerging Strategy intends to support the District's town centres?

In relation to town centres and Dursley, the ways in which the emerging strategy intends to support the town centre is aligned with the Dursley Neighbourhood Development Plan 2018.

Question 2.2b

Do you support an alternative approach? Or have we missed anything?

In addition to the planning system Dursley Town Council will actively seek an opportunity to work with the district council and other partners to bring forward suitable proposals to help deliver the Dursley Town Centre improvements listed in both the Emerging Strategy and the Dursley Neighbourhood Development Plan 2018.

A Local Need for Housing

Question 2.3a

Do you agree with the ways in which the emerging Strategy intends to meet local housing needs?

We agree with a majority of the ways in which the emerging Strategy will seek to deliver the local housing need. However, we would advocate strongly for the development of brownfield sites within existing settlement boundaries to be given priority over the loss of any greenfield sites. This approach would be supported by the Dursley Development Strategy (page 12 in Dursley Neighbourhood Development Plan 2018 (NDP)) and Policy H1 Housing Development also in the Dursley NDP.

We support the district council's proposal to seek opportunities to bring forward housing development on brownfield sites through the identification and potential allocation of sites appropriate for housing on the Brownfield Register.

Question 2.3b

Do you support an alternative approach? Or have we missed anything?

Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. (**Conserving and enhancing the natural environment para 170 of the revised National Planning Policy Framework 2018** (previously the National Planning Policy Framework 2012).

The top key issues identified within the emerging strategy emphasise the importance of this to the Stroud District. Issue 2 seeks to address 'Conserving and enhancing Stroud District's countryside and biodiversity' and Issue 4 'Developing strategies to avoid, reduce and mitigate the direct impacts of development on the natural environment'.

Planning policy and design guidance that supports this is vital given the benefit that the natural environment and green space has for communities, their health and their overall wellbeing.

Local Green Spaces & Community Facilities

Question 2.4a

Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?

The ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities are largely supported.

We would support a set of standards for local open space, sport and recreation and community facility provision, to guide future development which is higher than the current standards for these but not lower. As evidence collected as part of the Dursley Neighbourhood Development Plan 2018 (NDP) found that a survey of different types of outdoor play spaces within the Parish revealed that the provision of play spaces is insufficient for the population size, with the overall play space provision being 30% lower than the national guideline requirement (Dursley Outdoor Play Space Survey Revised September 2016).

The provision of Green Spaces also brings additional benefits to the population. Additional evidence from Dursley NDP states 'Preserving the green spaces within the town is also important, whether informal or designated play areas. There is national recognition that green spaces enhance well-being and are beneficial to health'. (Environment & Green Spaces Report 2015, page 5).

Please see our response to question 5.1a which details our opposition to the development of the greenfield site PS29. It is relevant to the "continued protection of identified areas of biodiversity, landscape, and heritage importance".

Questions 2.4b

Do you support an alternative approach? Or have we missed anything?

Given the significance of the Cotswold Area of Outstanding Natural Beauty and the importance of the Cotswold Way National Trail to the Stroud District, it's protection should be referenced on page 21.

In relation to Dursley, the points outlined on page 21 are aligned with the Dursley Neighbourhood Development Plan 2018.

A Vision for the Future

Question 3.1a

Do you agree with the vision for 2040 as drafted?

It would be good to include a reference to the Cotswold Way National Trail in the vision.

Tourism could be mentioned, alongside green technologies and creative industries.

Question 3.1b

Do you support an alternative approach? Or have we missed anything?

There is a need to ensure that work surrounding the Gloucestershire 2050 Vision is considered closely when developing the district's Emerging Strategy. The vision is examining infrastructure, connectivity and economic issues across the county and has so far identified the following project ideas for the future which would directly impact on development in our area:

- *Severn Vale Regional Park*
- *A new multi-purpose crossing between Lydney and Sharpness**

*The new crossing would provide a catalyst to grow the town of Lydney and to develop Sharpness from a small village to a town.

Strategic Objectives

Question 3.2a

Do you agree with the Strategic Objectives as drafted?

It would be good to include a reference to green spaces in either Strategic Objective SO1: Accessible Communities or Strategic Objective S01a: Healthy, inclusive and safe communities. There is no reference to green spaces in Strategic Objective SO5 Climate change and environmental limits or SO6: Our District's distinctive qualities.

Question 3.2b

Do you support an alternative approach? Or have we missed anything?

No Comment

The Emerging Growth Strategy

Question 4.2a

Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

The broad approach of the emerging growth strategy is supported. We understand the rationale for the approach in concentrating housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud where there is best access to services, facilities, jobs and infrastructure. We also appreciate that the delivery of 'new garden village communities' at Newtown/Sharpness and Wisloe provides an opportunity to transform all services for both new and existing residents and businesses.

However, we feel strongly that significant development sites within the Emerging Strategy should be located close to employment and key transport networks and infrastructure and we do not support the preferred direction for housing growth in landscape terms to the southeast for **Dursley**. With reference to site PS29 we ask Stroud District Council to find an alternative site to host these additional 80 houses. (Please see our response to **question 5.1a** which details our opposition to the inclusion of site PS29 in detail).

As stated previously, it is essential that additional services are provided in tandem with new housing development and that the existing local population is not adversely affected by the increase in demand for these services that the residents of new housing will inevitably bring. New and improved infrastructure should be provided prior to new housing and not after.

We are concerned about the impact on local schools and medical facilities and their capacity to cope with increased demand.

Also the increased traffic travelling on the A38 and the A4135 and the additional pressure on the existing road network and parking facilities, aggravating existing traffic, parking and safety issues. E.g. Silver Street, located on the busy A4135 in Dursley, acts as a bottleneck area that becomes congested with traffic and is routinely raised as a concern particular to pedestrians as the pavement is very narrow. Also, the Box Road/A4135 junction in Cam and its suitability and capacity to cope with increased traffic flow, as we currently consider it to be inadequate.

Any measures that would have an adverse impact on the flow of traffic travelling in and out of Dursley would be unacceptable.

Developments would potentially increase use of the Cam and Dursley Rail Station and local bus services. The rail station has seen an increase in use over recent years and is in need of improved parking provision and improvements to cope with additional pressures. Safer routes to and from the station for pedestrians and cyclists are important. We raised the need for a suitable pedestrian/cycle bridge over the Bristol mainline railway on the A4135 in 2016.

The Dursley and Uley Greenway is a vital community project, the planned route should be protected as it aims to provide a safe pedestrian cycleway through the areas, with eventual links to Slimbridge and the National Cycle Route.

Question 4.2b

Do you support an alternative strategy approach?

As above

Question 4.2c

Have we identified the right towns and villages for growth? Or do other settlements have growth potential?

Yes, in principle we support development being proposed close to Tier 1 settlements as long as the required infrastructure is in place and proposals respect existing environmental and landscape designations constraints. **(See our response to questions 4.2a & 5.1a)**

Question 4.2d

Do you support our approach to addressing Gloucester's housing needs?

We recognise that Stroud District Council is committed to working together with authorities within Gloucestershire to identify the most sustainable sites to meet future housing needs. We await the outcome of the assessment of potential alternative sites to meet future needs in 2019 and how this might impact on the Emerging Strategy. As a first priority we would emphasise the importance of potential sites within our district being used to meet our unmet housing need in the Stroud District.

Question 4.2e

Do you support an alternative approach to addressing Gloucester's housing needs?

No comment

Settlement Hierarchy

Question 4.3a

Are any of the settlements in the wrong tier and, if so, for what reason?

No comment

Question 4.3b

Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits? Or do you support an alternative approach of simply treating them as 'open countryside'? What are the pros and cons of either approach?

No comment

Question 4.3c

Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements? How should we develop a policy framework to achieve this?

We agree that the Local Plan should seek to manage the cumulative impacts of growth through an integrated approach whereby all impacts are considered together and not assessed in isolation from each other.

Dursley should remain as a Tier 1 settlement in conjunction with Cam. It is recognised that the town has both environmental and physical constraints and limits to growth.

Settlement Development Limits

Question 4.4a

Do you support the emerging Strategy's approach towards maintaining settlement development limits?

No, however we support continuing with the **current existing** approach to settlement development limits for Dursley. These are an established part of the strategy for managing growth and are well understood by stakeholders. The approach largely ensures environmental, biodiversity and landscape objectives are protected and issues with the different interpretation of written criteria are avoided.

Question 4.4b

Or do you support an alternative approach?

No

Question 4.4c

Do you support the proposals to allow some limited development beyond the settlement development limits?

No

Question 4.4d

Or do you support an alternative approach?

No Comment

Question 4.4e

Do you support the specific changes to existing settlement development limits that are set out in Appendix A?

The minor change proposed in Appendix A, to Dursley SDL – DUR01 Shearing Close, Littlecombe, is supported as it will bring the settlement development limit up to date.

Question 4.4f

Do you support any other changes to settlement development limits, not listed in Appendix A?

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Making Places: mini visions and priorities for your area

Question 5.0a

Do you support the proposed mini-visions for your area?

Dursley – Yes, we support the mini vision but specific references to natural environment, wildlife and green spaces need to be added.

Question 5.0b

Would you like to propose alternative wording for any of the mini-visions?

Dursley - Additional wording should include 'It will be a place where wildlife thrives, and the natural environment and green spaces can be enjoyed by residents and visitors'.

A reference to Tourism could be added in higher up, although it is mentioned late on.

Question 5.0c

Do you support the identified key issues and priorities for action for your area?

Dursley -Yes

Question 5.0d

Are there other important issues and priorities you would like to highlight?

The wording of the '**Making Places | Shaping the Future of Cam & Dursley**' section, including the key issues and priorities, outlined on page 68, largely reflects what is within the Dursley Neighbourhood Development Plan 2018.

The importance of reducing car borne traffic levels and delivering public transport improvements are also important issues and priorities for Dursley.

Making Places: potential sites and alternatives

If you would like to comment about whether we have identified the right settlements for growth, or whether other settlements have growth potential, please refer back to Question 4.2c.

Question 5.1a

Assuming some growth is desirable, have we identified the best site(s) at each town and village? Would you like to promote an alternative site for consideration through the next SALA?

The proposed development site PS29 North of Ganzell Lane in Dursley for 80 dwellings plus open space should **NOT** be included in the emerging Strategy.

It is a greenfield site located **outside the current defined settlement boundary** which should remain.

The existing settlement boundary follows the built-up area tightly to the east and west. It ensures that there is a countryside gap/buffer between the town and ancient woodland, key wildlife sites and landscape that is of intrinsic value to the character of the town and the beauty and setting of the Cotswold Area of Outstanding Natural Beauty (AONB), which overlooks the area.

The value of the Cotswold AONB itself is much wider for our district than its clear evidence-based landscape and environmental significance. It is also of the utmost importance in terms of the areas tourism offering and its ability to capitalise on the tourism industry so that it can contribute fully to economic growth of the area.

Development of the site would reduce the gap between the town and the AONB. The open character of the site, and its position adjacent to high sensitivity landscape areas, makes an important contribution to restricting the encroachment of the town into the countryside.

Development of the site is contrary to **Chapter 15 – Conserving and enhancing the natural environment para 170 of the revised National Planning Policy Framework 2018** (previously the National Planning Policy Framework 2012) which states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by:

Protecting and enhancing valued landscapesand

Recognising the intrinsic character and beauty of the countryside'

Also confirmed by the Planning Inspector (August 2015) for the Appeal decision in respect of Appeal Ref: APP/C1625/W/15/3007972 Land off Shakespeare Road, Dursley, Gloucestershire – which is relevant in this case and sought to develop 100 dwellings including affordable housing and open space; creation of new access to Shakespeare Road and internal roads, footpaths and landscaping.

Para 29 of the Conclusion states ...'*On balance, however, I do not consider that further housing in this location would outweigh the adverse impact the development would have on the wider landscape in the vicinity of the appeal site. Together with its effect on the setting of the nearby AONB this would be contrary to relevant development plan policies and objectives in the NPPF and PPG (now Local Plan Policy ES7).*

Development of the site PS29 would be contrary to policies CE1 and CE8 of the Cotswold Area of Outstanding Natural Beauty Management Plan 2018-2023, which seek to conserve and enhance the landscape character, scenic quality and enjoyment of its special qualities and natural beauty.

Development of site PS29 is also contrary to the following policies in the Dursley Neighbourhood Development (NDP) adopted by Stroud District Council in November 2018. It is important to stress that the Dursley NDP underwent extensive public community consultation.

The '**Dursley Development Strategy**' within the NDP sets out the context for development proposals which are supported by policies within the NDP.

Page 12 states that 'Dursley is constrained in terms of future development, with the urban area of Cam to the North and the Cotswold AONB surrounding the town to the east, south and west. The settlement boundary follows the built-up area tightly to the east and west. Ancient Woodlands and trees on the skylines surround, providing an attractive green backdrop to the settlement.'

The land in the AONB adjoining Dursley is not currently needed to meet housing requirements, and national policy gives AONB land the highest status for protection for its landscape and scenic beauty. The AONB and green setting of Dursley is a strong characteristic of the town which must be retained. Therefore, planning permission for development in the AONB will continue to be refused, unless exceptional circumstances in the public interest can be demonstrated in line with National Planning Policy (NPPF para 172) and Stroud '.

Page 15 Sites located outside the settlement boundary, many of which are in the AONB have been assessed as part of the Neighbourhood Plan process, but such development is not supported at the current time.

As long as development supports the policies within the NDPs, together with national and Stroud level policies, development would be supported in principle on brownfield and infill sites.

Development of site PS29 would be contrary to NDP policies **Environment and Sustainability Policy ES2: Key Views and Landscape**. The size and scale of this proposed development site would have an adverse impact on the Cotswold AONB.

Housing Policy H1 – Housing Development –due to the town's landscape constraints it is unlikely that further large-scale development will be possible, however, the development of sites within the settlement boundary will still be open to consideration – such as those identified in the development strategy as potential areas for enhancement.

The Dursley Biodiversity and Wildlife Report 2014, produced for the NDP, highlights the important wildlife corridors within Dursley and the wildlife value of site PS29:

*'Notably for Dursley: slow worms *Anguis fragilis*, great crested newts *Triturus cristatus* (protected under the Conservation of Habitats and Species Regulations 2010 and the Wildlife and Countryside Act 1981) small mammals and their attendant predators – kestrel *Falco tinnunculus* and barn owl *Tyto Alba* have all been observed in the fields included in the current housing development proposal for the land off Ganzell Lane (Eric Palmer pers. comm.). These fields are part of the last remaining rank grasslands with old un-flailed hedgerows to the south of the River Ewelme between Dursley and Uley'*

The Emerging Strategy seeks to address the top five issues identified on page 7, two of the five are very relevant to site PS29, given its location:

Issue 2 'Conserving and enhancing Stroud District's countryside and biodiversity including maximising the potential for a green infrastructure network across the district

Issue 4 'Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment'

Strategic Objective SO6, identified on page 25, is also very relevant:

Our District's distinctive qualities: Conserving and enhancing Stroud District's distinctive qualities, based on landscape, heritage, townscape and biodiversity

Development on site PS29 would conflict with the key issues and objective SO6. It would not conserve and enhance Stroud District's countryside and biodiversity, it would have a significant adverse impact on the landscape, the AONB, the natural environment and wildlife in the area.

The impact on the landscape would be irreversible. It would also result in the permanent loss of agricultural land. According to Natural England's Land Classification for Agricultural Land this area is grade 3a and 3b which is good to moderate. ALC grade 3a is classed as BMV (Best and Most Versatile) agricultural land, which confers protection via NPPF policy and PPG (*see notes below)

***The NPPF refers specifically to BMV agricultural land:**

Section 15 Conserving and enhancing the natural environment

Para. 170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- (a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory or identified quality in the development plan);
- (b) Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of best and most versatile agricultural land, and of trees and woodland.

In addition, Para 118 (b) of the NPPF highlights that undeveloped land can be used for other functions such as wildlife, recreation, flood risk food protection etc.

Site PS29 is in close proximity to an established working chicken farm. Future occupiers of the houses on the proposed site would be subject to an unacceptable level of smell and noise from the farm contrary to para 180 of the NPPF.

Site PS29 and the area located to the north of it are prone to flooding. The main water course of Castle Stream emerges and runs through the area before running into the River Ewelme and during extended periods of wet weather many natural springs appear. Development of the site would impact the water run-off and exacerbate existing problems, having an adverse impact on property and people in affected areas.

One such area is the existing Cotswold View development, which is represented by the Cotswold View (Dursley) Management Company. The company has documented evidence related to severe flooding and its impact on property and the B4066 Uley Road. These problems are linked to the emergence of natural springs on the proposed site, the high-water table level and increased/excessive surface water runoff. The Environment Agency Head Consultant, Stroud District Council's Water Resources Engineer and Gloucestershire County Council's Local Highways Manager have all been involved in ongoing issues related to flooding in the area.

The Environment Agency Head Consultant has advised the Management Company that even with the required SuDs surveys it would be difficult to locate all likely spring points and calculate future water runoff related to development of site PS29, potentially not all future water sources or volumes would be correctly diagnosed resulting in them not being intercepted or diverted safely. This would cause major issues on adjacent land, homes and watercourses further on.

Development of site PS29 would conflict with Strategic Objective SO5: Climate Change and environmental limits in the Emerging Strategy, which seeks to promote a "development strategy that mitigates global warming, adapts to climate change and respects out environmental limits by", among other things, "minimising and mitigating against future flood risks, recycling water resources and protecting and enhancing the quality of our District's surface and groundwater resources".

Evidence obtained from the Neighbourhood Development Plan audits highlighted issues within the existing transport infrastructure in Dursley.

Site PS29 is situated to the southeast fringe of Dursley. Development would significantly increase the traffic flow in the surrounding estates and through the town centre to get to main community facilities, supermarkets, main transport and highway links including the Cam and Dursley train station, which itself is in need of improvements to capacity.

Silver Street, located on the busy A4135, acts as a bottleneck area that becomes congested and is routinely raised as a concern particular to pedestrians as the pavement is very narrow.

Vehicular access to PS29 from the Shakespeare Road estate would be inadequate and would have a detrimental impact on the safety of highways users, contrary to para – 108 b of NPPF. The estate roads are narrow and are unable to safely meet the additional demands that would be placed upon them from the traffic generated by a development on site PS29 and additional highway users. The Ganzell Lane/Whiteway junction would also be inadequate given its location at the foot of a steep hill, on a corner, opposite a designated 'escape lane'.

Development on site PS29 would not be sustainable for the town. Development would be supported in principle on brownfield and infill sites.

Significant development sites within the Emerging Strategy should be located close to employment and key transport networks/infrastructure. **(Please see our response to question 4.2a, which is also relevant)**

Background Studies

Question 6.1

Are there any other specific local studies that you believe are needed to inform the Local Plan review? If so, have you any advice on the scope or content of any of these studies?

The Evidence Base for the Dursley NDP

<https://www.dursleytowncouncil.gov.uk/evidence-base-for-the-ndp.html>

Including the Cam and Dursley Rail Station Travel Survey commissioned by Dursley Town Council, Cam Parish Council and Gloucestershire County Council (2014).

The Cotswold Area of Outstanding Natural Beauty Management Plan 2018-2023

Gloucestershire 2050

<https://www.glos2050.com>

<http://naturalengland-defra.opendata.arcgis.com/datasets/agricultural-land-classification-alc-grades-post-1988-survey-polygons-england?geometry=-2.346%2C51.672%2C-2.33>

Magic Map Agricultural Land Classification

Castle Stream Farm, Dursley Agricultural land Classification October 1997

Planning Policy Guidance:

“Should planning take account of soil?”

The National Planning Policy Framework states that the planning system should protect and enhance valued soils and prevent the adverse effects of unacceptable levels of pollution. This is because soil is an essential finite resource that provides important ‘ecosystem services’, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution.

Paragraph: 025 Reference ID: 8-025-20140306

Revision date: 06 03 2014

How can planning take account of the quality of agricultural land?

The National Planning Policy Framework expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. This is particularly important in plan making when decisions are made on which land should be allocated for development. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The Agricultural Land Classification provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system.

Natural England provides further information on Agricultural Land Classification. The Agricultural Land Classification system classifies land into 5 grades, with Grade 3 subdivided

into sub-grades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non food crops for future generations. Natural England has a statutory role in advising local planning authorities about land quality issues.

See related policy:

paragraph 170

Paragraph: 026 Reference ID: 8-026-20140306

Revision date: 06 03 2014

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