



# Dursley Town Council



*Town Clerk:* Mr John Kay  
Jacob's House, Castle Street,  
Dursley, Gloucestershire, GL11 4BS  
Telephone: 01453 547758  
Email: [clerk@dursleytowncouncil.gov.uk](mailto:clerk@dursleytowncouncil.gov.uk)  
[www.dursleytowncouncil.gov.uk](http://www.dursleytowncouncil.gov.uk)

Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
Ebley Mill  
Stroud  
Glos GL5 4UB

22<sup>nd</sup> January 2020

Dear Sir/Madam

## **Stroud District Council Local Plan Review – Draft Plan for Consultation**

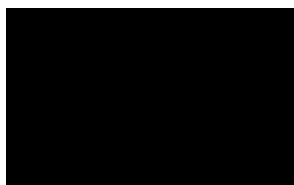
Please find enclosed Dursley Town Council's response to the Stroud District Council Local Plan Review – Draft Plan for Consultation, November 2019.

The Council appreciates all the hard work that has gone into reviewing the Local Plan and the challenges when planning the timetable for such complex and important strategy reviews.

Given its significance and the fact that the consultation period fell during the Christmas period again, we consider that a 12-week consultation period should have been set for draft Local Plan responses.

We would appreciate it if this feedback could be considered when setting the timetable for future consultations.

Yours sincerely



Town Clerk  
Dursley Town Council

Enc.

## **Stroud District Local Plan Review –Draft Plan For Consultation**

### **Response from Dursley Town Council clerk@dursleytowncouncil.gov.uk**

Dursley Town Council's representations in respect of the Stroud District Council Local Plan Review are outlined below, section by section. Please note that there is some cross over, the comments and concerns raised under one section may also be relevant to other sections of the plan, references are given.

#### **Section 1. Setting the Scene - Why do we need a plan?**

No comments

#### **Section 2. Making Places - The Development Strategy**

##### **2.1 Stroud District tomorrow – a vision for the future & 2.2. Strategic Objectives**

As stated in our January 2019 consultation response, it would be good to include reference to green space in the strategic objectives. Although we do recognise the open space and community strategy outlined under 2.8 and the inclusion of the new policy DES2 which covers Green Infrastructure.

Given the significance of the Cotswold Area of Outstanding Beauty and the importance of the Cotswold National Trail to the Stroud District, its protection should be explicitly referenced within the strategy.

##### **2.3. An introduction to the development strategy & 2.4. Our towns & villages**

The broad approach of the proposed development strategy is supported. We understand the rationale for the approach in concentrating housing growth at the main towns of Cam and Dursley, Stonehouse, Stroud and edge of Gloucester 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.

We feel strongly that significant development sites within the Emerging Strategy should be located close to employment and key transport networks and infrastructure.

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 do not support the preferred direction for housing growth in landscape terms to the southeast for **Dursley**. We are very pleased that site PS29 has **not** been included in the Local Plan document, for the reasons already stated in our January 2019 consultation

response which objected strongly to its inclusion and still stands. Please see section 3 below which also refers.

Regarding point 2.20, the developments in Cam will not provide “...a landscaped buffer between the existing edge of Cam and the M5 motorway” as stated. It will be a suburban buffer. Coupled with the Wisloe site, ribbon development will exist along the length of the A4135 from Dursley to the A38. With no plan for future employment growth this will be a vast dormitory development. It is essential that service, commerce, recreation, leisure etc are integrated.

The connectivity of the sites to existing settlements, public facilities, key employment sites, educational facilities is very important. This includes safe routes for pedestrians and cyclists and viable sustainable public transport infrastructure and services, without such things people will remain dependant on their car for commuting.

Please see the relevant points and concerns raised below:

### **Schools & community facilities**

We are concerned about the impact on our local secondary school Rednock and medical facilities (e.g. GP surgeries) and their capacity to cope with increased demand from the proposed large development sites in the area (Incl. Cam, Wisloe, Berkeley, Sharpness).

Proposed development sites for Cam and Wisloe do not include new secondary school provision and they will need it, along with other retail and community facilities, given their size.

A new secondary school is proposed as part of the Sharpness development, but this is marked as ‘phase 2’ and, dependant on the speed at which different developments progress, may not be ready to take on new students when they move into the area.

### **Highways**

We are concerned about the increased traffic travelling on the A38 and the A4135 and the additional pressure that development will place on the road network and parking facilities, including the M5 junction, aggravating existing traffic, parking and safety issues.

The following are of particular concern:

- 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.
- A concentration of traffic at the Slimbridge roundabout which is our main link to the A38 and M5 transport connections. The capacity and operation of this roundabout to cope with increased levels of traffic is important.
- New junctions onto the A4135, congestion and maintaining the flow of traffic in and out of Dursley.
- The Box Road/A4135 junction in Cam is our main route to the train station and it requires complete change to accommodate increased traffic flow. The current junction is difficult and hazardous.

In relation to highways improvements, any measures that would have an adverse impact on the flow of traffic travelling in and out of Dursley would be unacceptable.

In recent years the Council has strongly opposed proposals to install traffic lights at locations, including:

- At Draycott, Cam on the A4135
- On the A4135 over the Bristol mainline railway bridge (2015, S.14/2612/DISCON).
- Proposed traffic lights at the Sandpits/Tilsdown/ Dursley Road junction (2016, S.15/2804/OUT & the Stroud Local Plan Capacity Assessment, public meeting held on 27/09/16 (70 members of public attended).

Traffic lights would have an unacceptable adverse impact on the flow of traffic travelling in and out of Dursley.

There is no evidence that traffic lights improve the flow of traffic. In the past use of traffic lights has resulted in long queues, congestion and delays which also has an adverse impact on the environment and emissions. The Council campaigned hard several years ago to successfully remove the traffic lights at the Castle Street/May Lane junction in favour of the existing mini roundabout which dramatically improved the flow of traffic.

The Council considers a roundabout to be a suitable, sustainable alternative measure, in terms of traffic flow, maintenance and the environment, to a signalised junction.

We would like to be kept fully informed of progress on the Stroud Local Plan Capacity Assessment document and to be consulted on any measures it proposes.

Connectivity is very important; developments need to consider this carefully and incorporate safe walking/cycling accessibility to nearby town centres / primary and secondary educational facilities.

### **Public Transport & The Cam & Dursley Station**

The proposed 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. It is recognised that there is a lack of car parking with overspill onto Box Road and a need to improve station facilities and capacity.

There is no clear plan given to resolve the parking issue or what the station improvements may be. Councils at all levels should work together with relevant interest groups and Network Rail, including the Cam and Dursley Transportation Group and the Cotswold Edge and Severn Vale Tourism Network, to agree a clear vision and plan for the station now so that it can be built into the masterplan and strategy.

Safe routes to and from the station for pedestrians and cyclists are currently lacking and are very important if you want to encourage more people to use public transport over cars.

We raised the need for a suitable pedestrian/cycle bridge over the Bristol mainline railway on the A4135 in 2016. The footway on the A4135 which crosses the railway line, between the A38 roundabout towards Box Road, is too narrow and incomplete in areas. This needs to be improved with a widening/reconstruction of the bridge itself (which currently appears to be subsiding) to accommodate a suitable footway without adversely impacting the flow of traffic or by providing a new pedestrian/cycle only bridge, linked to footways.

There also needs to be an increase in bus service frequency and bus stop infrastructure, with improved connections to Cam and Dursley railway station and to key employment sites/zones. There is the potential for a park and ride to improve integration and benefit settlements. The bus station in Dursley and the Rail Station would benefit from 'real time' information regarding buses and public transport fares must be affordable.

Having a good bus/train service to Gloucester/Bristol doesn't necessarily mean that people will automatically be better off getting to their place of work, if they have to walk 3 miles to the station because there has never been an integrated bus service or if the walking/cycling routes there are unsafe.

### **The Greenway**

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

We recognise that the developments proposed offer an opportunity to get the route and links to Slimbridge and the National Cycle route delivered. Developers should not however be allowed to undermine the route itself and its accessibility by proposing inappropriate and inadequate finishes. It should be clearly incorporated into the plan and fully inclusive in its design.

The Greenway should be accessible to everyone – cyclists, people with physical challenges, walkers, school children, horse riders, commuters and those who just want a short leisure trip, families, shoppers.

## **2.5. Housing**

The provision of high quality housing that supports a mixed community in terms of tenure and age profile is a key aim of the Dursley Neighbourhood Development Plan.

We recognise that the supply of affordable homes is an issue across the district, as is providing well designed energy efficient homes that will be fit for the future.

Affordable housing is required for people who do not qualify for social housing but cannot afford market housing at today's prices. It is also vital to ensure that there is enough social housing within the allocation of affordable homes and there should be greater focus on this.

Innovative models of housing such as starter homes, community land trusts and self-build are some of the methods of delivery that the Dursley Neighbourhood Development Plan would like to support while always ensuring that design quality is high.

The core and delivery policies under 'homes and communities' and 'our environment and surroundings' are positive in terms of energy efficiency design but they need to be strengthened to ensure that new homes must incorporate the latest in energy efficient design, enough car charging points and high-speed fibre broadband. Fitting solar panels, ground source heat pumps, charging points and other energy efficiency designs must not be viewed as a choice by developers – words like 'should' and 'encourage' within policies could, unfortunately, help developers do the minimum and wrangle out of designs that are vital if we want to build homes that are future proof and meet the District's carbon neutral target.

## **2.6. Local Economy & jobs**

Employment growth outlined in the current local plan has not progressed as envisaged in the Cam and Dursley area; non-development of existing allocated sites is a concern, as is delays.

Also of concern is the site in Cam allocated as employment recently being lost to a new housing development at Coaley Junction.

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. The evidence put forward to justify the loss of employment land should be extensive.

Small businesses are the most significant sector within Dursley. These enterprises range from self-employed individual working from home to small businesses providing employment for 1 or 2 people. It is important 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.

Transport infrastructure and connectivity is also important to the local economy, this includes everything from adequate public parking for customers, integrated public transport links to high speed fibre broadband.

In terms of the local economy, the emerging strategy is closely aligned with and supported by the combination of policies and projects outlined in the Dursley Neighbourhood Development Plan (NDP) 2018 to support our local economy, encourage new start-ups, retain town centre retail offer and provision, support change of use from existing properties to hotel and guesthouse, support local tourism and safeguard existing employment sites and support viable mixed use development.

## **2.7. Our town centres**

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.

## **2.8. Local Green Spaces & Community Facilities**

The Dursley Neighbourhood Development Plan (NDP) 2018, Policy SF2 outlines 6 designated green spaces, in accordance with the provisions of para. 100 of the National Planning Policy Framework (NPPF).

The Dursley Green Infrastructure Map, within the Dursley NDP highlights the valuable natural habitat features e.g. woodland, grassland and green links within the town. 'Project K: Green Infrastructure' in the Dursley NDP seeks to further develop this map and establish a Green Infrastructure (GI) Plan in order to better protect and enhance green connections for people and wildlife.

This has clear links with the emerging strategy which seeks to deliver "a mapped GI network, linking urban areas to the wider countryside, identifying important habitats, landscape features, river and green corridors and ecological networks".

## **2.9. Core Policies**

The numbering appears to be incorrect on page 47, it states '2.8 Core Policies', should it be 2.9?

### **Core Policy DCP1**

The following text is problematic: "*designed to discourage the use of the private car, irrespective of fuel source...*" The emphasis should be to support new electric vehicles. There should be no implication that maintenance of existing provision or new development will be compromised.

### **Core Policy CP3**

The policy states that suitable development may be permitted within and (exceptionally) adjacent to Settlement Development Limits (SDL), in accordance with other detailed policies in the plan.

Settlement Development Limits are an established part of the current strategy and the Dursley Neighbourhood Development for managing growth and are well understood by stakeholders. The current approach largely ensures environmental, biodiversity and landscape objectives are protected and issues with the different interpretation of written criteria are avoided.

We recognise that the proposed policy CP3 allows for some flexibility and that in reality, under the existing Local Plan, there have been applications that have been granted planning permission for developments outside the settlement boundary on appeal, following district objection/refusal.

It is vital that the policies that sit alongside CP3 within the plan that would control development adjacent to the SDL are very clear and strong otherwise this has the potential to undermine the objective of managing growth. There is a real danger that there could be a proliferation of small developments, single plots or live-work developments, for example, that could adversely impact the countryside and undermine the purpose of the Area of Outstanding Natural Beauty designation and the character of the settlement. It needs to be tightly controlled.

The wording of delivery policies needs to be reviewed to ensure that there are no weaknesses. Policy CP3 states that “*exception sites: 100% affordable housing, including entry-level homes and affordable self-build/custom build homes*” but the last paragraph of the proposed delivery policy HC4 provides developers with a potential loophole they can abuse and use to reduce affordable housing for market housing on the basis of viability. It states “*The Council will consider the inclusion of some market housing*”.

#### **Core Policy CP4**

New development should embrace the concept of restoration.

#### **Core Policy CP6**

Developers should be constrained such that any unapproved deviation from the agreed plan is restored.

### **Section 3. Making Places – a spatial vision for Stroud District** **Making Places – Shaping the Future of Cam & Dursley**

We do not support the preferred direction for housing growth in landscape terms to the southeast for **Dursley**.

Dursley is constrained in terms of future development, with the urban area of Cam to the north, and the Cotswold Area of Outstanding Natural Beauty (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 backdrop to the settlement.

Please see comments below relating to sites.

#### **PS29 North of Ganzell Lane**

Dursley Town Council is very pleased that site PS29 has **not** been included in the Local Plan document.



The Council's consultation response, dated January 2019, clearly outlines the detailed reasons for opposition to development on this sensitive site and our position remains unchanged.

We would not want to see the site included in any 'reserve sites' list should it exist.

Any arguments that development here would enhance the AONB are not supported.

In the 'Stroud District Council (SDC) Local Plan Review Emerging Strategy Consultation Report – Part Two', SDC have recognised that development here, close to the edge of the AONB, would cause unnecessary harm and adverse impact on the setting of the AONB, particularly when there are other locations away from the AONB that are available to meet the needs of the local area and the District. Also recognised are the potential impacts of increased traffic in an area already subjected to congestion, the loss of usable agricultural land and open fields for amenity use (walking).

The site is very relevant to the following priority issues and strategy objective within the emerging strategy:

- *Conserving and enhancing Stroud District's countryside and biodiversity including maximising the potential for a green infrastructure network across the district.*
- *Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment.*
- *Strategic Objective SO6: 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 all of the above. It would not conserve and enhance Stroud District 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.

The Dursley Biodiversity and Wildlife Report 2014, produced for the Dursley Neighbourhood Development Plan (NDP) 2018, highlights the important wildlife corridors within Dursley and the wildlife value of site PS29.

The Dursley Green Infrastructure Map, within the Dursley NDP highlights the valuable natural habitat features on the site including woodland, grassland and green links (intact hedgerows). 'Project K: Green Infrastructure' in the Dursley NDP seeks to further develop this map and establish a Green Infrastructure (GI) Plan in order to better protect and enhance green connections for people and wildlife. It has clear links with the emerging strategy which seeks to deliver "a mapped GI network, linking urban areas to the wider countryside, identifying important habitats, landscape features, river and green corridors and ecological networks".

Also relevant is NDP policy ES1 *'Development resulting in the loss or deterioration of irreplaceable habitats including Dursley's Ancient woodlands and aged or veteran trees found outside ancient woodland, will not be supported, unless the need for, and benefits of, the development in that location clearly outweigh the loss'*.

Development on site PS29 would result in the permanent loss of good agricultural land. Land that has the potential to help achieve sustainability, produce local food, provide local jobs and contribute to a carbon efficient approach to living (e.g. low food miles), now and in the future.

According to Natural England's land classification for agricultural land this area is grade 3a and 3b which is good to moderate. Agricultural Land Classification (ALC) grade 3a is classed as BMV (Best and most Versatile) agricultural land, which confers protection via National Planning Policy Framework (NPPF) policy.

The NPPF refers specifically to agricultural land under 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 status 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 the best and most versatile agricultural land, and of trees and woodland;*

The national targets to reduce carbon emissions and the priority issue within the emerging strategy *"Moving the District towards becoming Carbon Neutral by 2030, whilst adapting to the impacts of climate change and providing resilience for the future"*, only highlight the importance of retaining this agricultural land further.

Under section 11. 'Making effective use of land', Para. 118, the NPPF also recognises *that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.*

In our consultation response dated January 2019, we provided detailed information relating to ongoing flooding issues and natural springs on the site and the area located to the north of it and the reasons why development of the site would only exacerbate existing problems.

Since the last consultation, from November 2019 to January 2020, the issue has only been further evidenced by Stroud District Council Principal Estates Surveyors and Severn Trent's involvement in pumping water from the pumping station in this area and dealing with extensive flooding on the land. (See photos supplied under 'Relevant Supporting Information/References')

### **PS28 The Old Dairy/Land off Prospect Place**

The site is identified in the Dursley Neighbourhood Development Plan (NDP) 2018-2031 as a Potential Area for Enhancement in the Dursley Development Strategy. The NDP states the following to be taken into account:

*Community Views and links to NDP policies:*

- *This area is detrimental to the appearance of the town centre, and has remained semi-derelict for some years. Enhancements to the appearance of this area would be supported in principle. (policy D.1)*
- *There is potential for mixed uses to be introduced, including employment and residential given close proximity to the town centre (policy TC.1). May Lane is a key street facing the library, entrances and activity onto this street would be welcomed (policy TC.1)*
- *Vehicle movement and access is already problematic, there are currently loading areas for shops, as well as access to residential properties, from May Lane. Improvements to the delivery operations of the supermarket loading area as accessed from the private lane would be supported.*
- *This location has an important Green Infrastructure role which should be retained, with due consideration given to protecting on site ecology (policy NE.1).*
- *Any new development must reflect the character of the location and sensitivities of the Conservation area and listed buildings (Policy D.1).*
- *There are major level changes through the site and the impact of any proposals on long views should be assessed (Policy ES.3).*
- *Pedestrian through access onto Parsonage Street should be retained, but there is scope to improve the route (policy TC.1, Project E).*
- *There are a number of residential and holiday let units in this location, proposals should not be detrimental to residential amenity.*

In March 2019 Dursley Town Council welcomed Stroud District Council's report to the Strategy and Resources Committee regarding the above site and the decision to proceed with the feasibility studies, as recommended under Phase 1 of the project identified.

Given this, the Town Council would very much like to be party to the discussions surrounding the development of the site and the different stages moving forward.

### **PS27 1-25 Long Street**

Dursley Town Council would very much like to be party to the discussions surrounding the site.

The evidence base for the Dursley Neighbourhood Development Plan includes a Site Assessment for this area of land. At the time suggested development uses were for retail and recreation rather than housing.

Sainsbury's has a clear view of the site and development would affect local businesses such as the Ye Old Dursley Hotel (was the Old Bell), Capones and also local residents. The site also provides some valuable parking provision which is used.

Access to the site is restricted by a very narrow road adjacent to a listed building which would restrict development.

Any development would need to be in keeping with the conservation area and the wooded area on the site is featured on the Dursley Green Infrastructure Map so due consideration should be given to this and protecting on site ecology.

### **PS26 Land off Acacia Drive/Oak Drive**

The Council notes that, while not mentioned in the Local Plan document itself, within the 'Stroud District Council Local Plan Review Emerging Strategy Consultation Report – Part Two', it is proposed that any development of this site would contribute to the supply from windfall development, for which an allowance is made in the Draft Local Plan.

The site was considered as part of the Dursley Neighbourhood Development Plan (NDP).

The evidence base for the Dursley NDP includes a Site Assessment for this area of land. At the time suggested development uses were for housing or community space.

It was considered for Designated Green Space but it did not meet the criteria at the time and was therefore not progressed.

The site does feature on the Dursley Green Infrastructure map as amenity grassland so due consideration should be given to this and protecting on site ecology should it be developed.

### **PS21 Land adjacent to Tiltdown House**

We have raised points above, under 2.3, regarding highways and transport which are relevant to this site and its connectivity. Please refer.

### **PS24 – West of Draycott**

We have raised concerns and comments above, under 2.3, regarding schools and community facilities, highways, the rail station and the Greenway which are all relevant to this site and its connectivity. Please refer.

A new secondary school will be needed to support proposed new developments both here and at Wisloe, as will retail and community facilities.

Entrance to the site at the north east corner may be hazardous given its proximity to the railway bridge, which forms the brow of a hill.

The site will need considerable provision of trees and hedgerows to minimise its impact on the rural setting and local ecology.

### **PS25 -East of River Cam**

We have raised concerns and comments above, under 2.3, regarding schools and community facilities, highways, the rail station and the Greenway which are all relevant to this site and its connectivity. Please refer.

Given its proximity to the River Cam, the proposed development site must accommodate flood protection and surface water run-off effects.

The site must integrate with schools provided for other new developments (PS24, Wisloe, Sharpness).

The site will need considerable provision of trees and hedgerows to minimise its impact on the rural setting and local ecology. The Rackleaze Wetland nature reserve is located in close proximity and should be protected from adverse impact.

### **PS36 – Sharpness Garden Village**

We have raised points above, under 2.3, regarding schools and community facilities, highways and the rail station which are relevant to this development and its connectivity. Please refer.

The proposed development site must take into account flooding and potential sea level rise in the future. Associated roads and infrastructure should also consider this so that in the event of flooding the new settlement is not cut off.

The new secondary school provision is vital for this and surrounding developments. The development as proposed would appear to fit as a tier 2 settlement.

### **PS37 – Wisloe Garden Village**

The adverse impacts on the A38 and A4135 and on the flow of traffic in and out of Dursley, as a result of this development and the associated increase in traffic, are of great concern.

We have raised concerns and comments under 2.3, regarding schools and community facilities, highways, the rail station and the Greenway which are all relevant to this site and its connectivity to the wider area and neighbouring settlements. Please refer.

A new secondary school will be needed to support the proposed new development here and in Cam.

The site will need considerable provision of trees and hedgerows to minimise its impact on the rural setting and local ecology.

The northern edge will need flood protection from the River Cam.

The development as proposed would appear to fit as a tier 3a settlement.

## **Section 4. Homes and communities**

### **Delivery Policy HC4**

In relation to Policy HC4, please refer to comments above under 2.9. Core Policy CP3.

Please refer to comments above under 2.5 Housing.

## **Section 5. Economy & Infrastructure**

### **Core Policy CP12**

On a fiscal basis how is priority of development trickled down? If this is not clearly defined Stroud, having top priority, will always benefit and other places will become neglected.

### **Delivery Policy EI12**

In relation to Policy EI12, see points raised under Section 8 for Appendix C.

## **Section 6. Our environment & surroundings**

Please refer to comments above under 2.5 Housing.

### **Delivery Policy DES2**

Delivery policy DES2 Green Infrastructure is a welcome addition to the plan.

## **Section 7. Delivery & Monitoring**

No comments.

## **Section 8. Appendices**

### **Appendix A – Potential changes to settlement development limits**

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

### **Appendix B – Areas of search for renewable energy locations**

No comments.

## **Appendix C – Parking standards for vehicles & cycles**

The parking standards are confusing, in particular Table A. The table title refers to 'Minimum cycle and motorcycle parking standards' but the table heading states 'Car parking'.

The Tables/Numbers relating to car parking standards for 'strategically significant land uses' and car parking standards for 'other land uses', are no longer specified by the Local Plan and will be a matter for negotiation and assessed according to individual circumstances.

While we recognise the proposed parking provision will need to be demonstrated to be suitable based on the factors outlined under 1 i-v., the wording in Parking Standards under 2, 6 and 7 encourage reduced parking provision and car ownership.

The Dursley Neighbourhood Development Plan (NDP) recognises that adequate parking spaces for new housing is a common concern for local people. NDP Policy T1 states *"Development which supports provision of car parking, especially development which provides higher levels of car parking than mandated in the Stroud Local Plan, will be supported"*.

Car parking is essential per dwelling – ideally off road for 2 cars as a minimum.

In Dursley we have seen the adverse impact of inappropriate/insufficient parking levels being applied to developments (e.g. Lister Road & Crest Nicolson development) and the impact this can have i.e. increased on-street parking levels, inappropriate parking, poor access and safety issues.

Regarding the proposed Parking Standards, there is concern that reducing parking provision will be taken too far and developments will end up with inadequate parking and that not enough weight will be given to the local reality when negotiating parking.

In areas that are not identified as proposed strategic locations for future employment growth people will likely remain dependant on their car for commuting.

In many places' viable suitable alternatives to car travel do not yet exist, public transport is limited, under developed and poorly integrated.

In reality the move over to charging plug-in cars may actually increase the need for parking provision within developments as spaces will need to be located close to home charging points - it will be more difficult to park elsewhere when you need to charge the car to get to work. The standards should also guard against a situation where the only alternative for people is to trail charging wires across access roads and pathways.

The importance of maintaining and increasing public car park provision in town centres, such as Dursley, will only grow given the increased demand that developments will bring to the area and more people visiting to shop and use the facilities and services.

## **Relevant Supporting Information/References**

- 1. Dursley Town Council's Response to the Local Plan Review Emerging Strategy Paper Consultation – January 2019**
- 2. Dursley Neighbourhood Development Plan 2018-2031 & evidence base**
- 3. Site PS29 - Photos relating to flooding Incident Nov 2019 – Jan 2020**



*Photos taken during flooding*



*Photos taken after the drainage by Severn Trent had commenced, shows the receding water and the 'tide mark' where the leaves got to, i.e. an even bigger flood than shown here. Certainly, impassable and the stream higher up was also swollen and flooding onto the fields.*





*Further photos following drainage, showing the view of previously flooded area and stream and culvert entrance.*

*Photo taken in the wooded area, in the corner of Highfields Play Park on 4/12/19. Shows trees submerged in flood water stretching into field beyond the play park. Which at the time looked like a large pond.*

**4. Agricultural Land Classification detailed Post 1988 ALC survey, Dursley, Castle Stream Farm (ALCB06497)**

<http://publications.naturalengland.org.uk/publication/5107923712737280?category=5106896712237056>

*Dursley Town Council's Response to the Local Plan Review Draft Plan for Consultation November 2019 – January 2020, was agreed at Full Council on 21/01/20.*