



**Dursley Neighbourhood Development Plan 2018-2031**  
**Examination Note – 17<sup>th</sup> August 2018**

Response to the Initial Comments of the Independent Examiner by the Neighbourhood Development Plan (NDP) Steering Group (SG) on behalf of Dursley Town Council.

Paragraph numbering for this response is the same as that in the Initial comments from the Independent Examiner.

Paragraphs 1 and 2 are noted.

Paragraph 3 The NDP Steering Group has prepared these comments on behalf of Dursley Town Council, who are the Qualifying Body.

**Regulation 16 Representations**

Paragraph 4

a. Gladman Developments

The Steering Group has not received any previous correspondence from Gladman Developments Limited during the course of developing this Neighbourhood Plan.

As stated in the NDP ‘The landscape setting and views are an important part of the character and charm of Dursley’. The policy ES3: Key Views and Landscape’ draws on the detailed Landscape Character assessment 2015, completed as evidence for the NDP. Views are based upon landscape significance and not solely community support.

Again, as stated in the NDP ‘the Housing need for Dursley is being met by a combination of large scale development (Littlecombe) and a range of smaller infill and brownfield sites within the settlement boundary’. The Steering Group have been consistent with the current Stroud District Local Plan with respect to policy H1: housing development in supporting future development within the existing settlement boundary.

With regard to policy SF2: Local Green Space Designation, the SG would draw your attention to the evidence collated in the ‘Local Green Space Designation Evidence Report and Consultation Statement as proof of support for Local Green Spaces Designations for the 8 areas proposed in the NDP.



b. Stroud District Council Property Services Team

The support from Stroud District Council from the majority of proposed LGS designations is noted, we are grateful for this support.

Local Green Space Consultation Process

The Steering Group would like to draw your attention to Paragraph 3.1 of the Pegasus Planning response on behalf of Stroud Property Services which refers to what 'appears to be some mismatch in chronology with responses on specific LGS sites cited from events held in June and early September 2016 (Dursley Town Festival 25/06/16; Transition C&D Flower show 3/9/16; and Dursley Farmers Market 10/9/16), all of which predate the selection of a 'long list of all potential LGSs as described at p3 of the LGS evidence base as taking place in October 2016'. References to the above are repeated in their paras 3.8 and 3.16. Please note that the proposed local green space designations which formed part of the consultations at the above events included **all** the proposed local green spaces on the long list dated October 2016 (as evidenced by the consultation write-ups – available on the NDP pages of the Town Council's website) Therefore we consider it is valid to cite this as evidence of support for these sites in the proposed local green spaces report, the LGS proposals were discussed with the community at these events. .

We note the Pegasus response report does not make any reference to the letters sent to the Stroud District Property Services team in February 2017 as part of the Landowner notification process for the proposed Local Green Space designations. No responses to these letters were received. Copies of these letters can be provided to the examiner on request.

The Property Services objection was made known in March 2018, and it was agreed at this time with the Stroud District Council link officer that there was a potential conflict with the updated Stroud SALA with reference to Acacia Drive that this should be considered now via the examination process. Dursley Town Council was keen that this should be designated as a LGS if it is possible to do so, and considers that it has met the NPPF criteria.

Comments on specific sites

Highfields Play Park and Field is already protected from development by SDCs Local Plan Policy ES 13 Protected Outdoor Play Spaces.



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This site is currently managed by Dursley Town Council under a 25 year lease agreement which started in 2016. Should this not be deemed a suitable LGS designation, it is suggested that the existing protection would be re-stated in the NDP itself to show that the site is protected for its recreational and play value.

The potential conflict between the proposed LGS designation of Acacia Drive and the updated SALA, was flagged up in discussions with the Stroud NDP link officer, during 2017. The NDP Steering Group consider that the LGS designation should take precedent, however it was agreed that the examiner should decide where the balance should lie as the NDP SG and Stroud District Council disagree over the development potential and special qualities of this green space.

c. Bell Cornwell on behalf of Avant Homes Ltd

**The SG would refer you to the letter sent to Bell Cornwell as part of the Regulation 14 Feedback.** A copy is included with this response. Bell Cornwell are pre-empting the Local Plan review conclusions about the level and direction of future growth in Stroud District, and specifically at Dursley, this pre-empts strategic decisions. The Stroud Local Plan review is at very early stage and should in our view be afforded very little, if any weight, at this stage.

d. Stroud District Council

Feedback and support from SDCs' neighbourhood planning officers has been helpful during the process of developing a neighbourhood plan.

The revised NPPF was published during the Regulation 16 Consultation period. The SG accept that the plan will need to amended to reflect new paragraphs in the NPPF.

Paragraphs 1 and 2 in the introduction and other sections as needed will be amended as recommended by the examiner.

Page 12 Dursley Development Strategy Explanation para 9. We could support the amendment of this in line with comments from SDC. This paragraph will be amended in line with the comments from SDC.

Page 22 Figure 5. This map can be reproduced at higher resolution on request.

Figure 6 as stated in the Design Framework section (below), we would support additional explanatory text to supplement the key if it would help further explain the summary



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diagram. Alternatively, the diagram itself could be removed and replaced with a cross reference. The latter would be our less favoured option as it is less accessible to the community.

Other minor changes are supported, as they are deemed to improve the wording of the NDP. Please note we will need to come back to you with a date for the approval of the masterplan.

### Policy ES1: Green Infrastructure

Paragraph 5 The 'green links' referred to in Figure 7 does relate to the hedgerow/treeline shown as a green dotted line. I attach the explanatory note which accompanies the green infrastructure map, which was inadvertently omitted from the draft plan evidence base at Reg 15 stage. This provides further information and clarification about the legend for the map.

Paragraph 6 The green infrastructure network is not a new movement network as such. It is a map which illustrates the existing 'green links' and the importance of these hedgerow and treeline for wildlife. The linkages appear clearer when this map is viewed online and we hope that applicants are able to see from this whether their proposals would lie on or close to the alignment of the network. Green links can then be extended, created or enhanced.

Paragraph 7 The objective of the green link is to protect and create multi-functional green infrastructure corridors that can support the movement of wildlife and biodiversity across Dursley. It is not to create a pedestrian route for residents and walkers to move through the area following green spaces and avoiding the roads.

### Community facilities

Paragraph 8 A list of Community Facilities/Services and Registered Assets of Community Value will follow.

### Long Street Town Green

Paragraph 9 This is still proposed as a local green space. The new road realignment has always been part of the plans for the Littlecombe development which is under construction. The map for the Long Street Town Green will need to be amended to reflect the new road realignment.

### Potential areas for enhancement

Paragraph 10. The 4 Potential Areas for Enhancement, are not site allocations or planning policies, some are projects and others are potential future development sites, subject to



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applications being made (these are brownfield infill sites and need not be allocated, it was deemed that there was not adequate evidence to allocate either site in the NDP itself). This status of these 'potential areas for enhancement' has been clarified through the SEA Screening process. The specific wording has been amended, to clarify this position in response to comments from Historic England in particular, this also led to additional text being added to the NDP to state that these are not site allocations. The SEA Screening Report can be found here: [https://www.dursleytowncouncil.gov.uk/uploads/dursley-ndp-\(final\)-sa-matrix-may-a-2018.pdf](https://www.dursleytowncouncil.gov.uk/uploads/dursley-ndp-(final)-sa-matrix-may-a-2018.pdf)

The Potential Areas for Enhancement summarise key planning policies found elsewhere in the NDP, which are relevant to these locations, they also summarise the community views as made known through the NDP process.

For further clarification a notation could be included if the examiner thinks this would be helpful (perhaps, as per the one on p25 of the NDP), to note that these grey boxes are not site allocations, and that they cross reference key planning policies elsewhere in the NDP which are relevant to these locations. Dursley Bus Station and Reliance House, Long Street are projects - they could be shown in light green as per the other projects if preferred? Cambridge House and the Old Dairy are potential future sites and they could remain a light grey?

### Dursley Urban Design Framework

Paragraph 11 The Dursley Urban Design Framework (2007) forms part of the evidence base for the Stroud Local Plan (see cross reference to key evidence on p63 of the Stroud Local Plan, 2015 - which refers to this document in draft:

<https://www.stroud.gov.uk/media/1455/stroud-district-local-plan-november-2015-low-res-for-web.pdf> ).

The Design Framework was consulted on in draft as part of the Stroud Local Plan consultation, however, it has not been separately adopted as a Supplementary Planning Document by Stroud, it remains a key evidence base only. In addition, the Design Framework was made available as part of the consultation on the draft Dursley NDP (alongside a 2017 update note, which highlights some of the aspects of the Design Framework which have now been delivered), it has been included alongside the NDP in the evidence base since pre Reg 14 stage.

The NDP, has also included key extracts from the document itself (e.g. character areas and summary diagram) since pre-Reg 14 stage - there was a pre-regulation 14 consultation, reg 14 consultation and latest reg 16 consultation which all afforded local people the chance to comment on it again (full details included in the Consultation Report). Further comments



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were made on the Dursley Urban Design Framework during the NDP process which led to a few specific minor amendments (dated 2017).

The Urban Design Framework was jointly commissioned by the Town Council, together with Stroud District Council (and other members of the Vale Vision partnership as mentioned on p3 of the Design Framework itself, consultation with these groups informed the preparation of the Urban Design Framework, and there was also public consultation event in Nov 2006 (the Urban Design Report contains a precis of this consultation).

Stroud District Council have completed a screening assessment for the Dursley NDP, including policies TC1 and D1, which assesses the draft plan and notes that full SEA is not needed:

<https://www.dursleytowncouncil.gov.uk/uploads/dursley-sea-and-hra-screening---determination.pdf>

Dursley Town Council has completed its own Sustainability Appraisal of the NDP (link below), these note policies D.1 and TC.1 as making a positive contribution the heritage and character

[https://www.dursleytowncouncil.gov.uk/uploads/dursley-ndp-\(final\)-sa-matrix-may-a-2018.pdf](https://www.dursleytowncouncil.gov.uk/uploads/dursley-ndp-(final)-sa-matrix-may-a-2018.pdf)

The Dursley Urban Design Framework has been used since 2007, to inform enhancements to Dursley Town Centre, it is hoped that by including it in the NDP evidence base and by drawing out key elements into the NDP itself it will give the Design Framework additional weight in planning as well as greater accessibility from the community, who can find the proposed enhancements summarised in the in the NDP itself.

## Summary

Paragraphs 12 and 13. A formal response has been prepared by the NDP SG, and approved by the Town Council Planning Committee and will be with you by Friday 24th August.

This response will be placed on the NDP Web pages of Dursley Town Council's website.