

Re: Dursley Neighbourhood Development Plan (NDP) – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended) and the Localism Act 2011

To fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the Council has commented on the emerging Dursley NDP on a number of occasions.

We are committed to helping the qualifying body deliver a successful plan. In order to achieve that, we take this opportunity to offer constructive comments on issues that we consider have not yet been addressed in a satisfactory manner.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions.

Yours Faithfully

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Strategic Head (Development Services)

Stroud District Council

TABLE 1

Section	NDP Section or Policy	Comment	Recommendation
	General	There are a number of locations where reference is made to particular paragraphs in the NPPF. However, these will change shortly when the Government publishes the new NPPF.	Amend to reflect new paragraphs in new NPPF or remove specific references to avoid dating the plan.
	Introduction, para 1 and 2	NDPs have now been around for 7 years so perhaps not that new. The term “legal weight” is misleading and the NDP would be better referred to as forming part of the development plan..	Amend the paragraph in line with comments. “It forms part of the development plan and allows local people to say how they want to see the future development of their parish or town. It sets out clear planning policies which will give direction to developers and inform decision-making by a range of bodies including district and county councils.”
P12	Dursley Development Strategy, Explanation para 9	This paragraph implies that any planning permission in the AONB will be refused. This isn’t the case (e.g. rural exception sites) and it is beyond the remit of the NDP document to state this. The consideration of development in the AONB is more complex than this paragraph implies, the NPPF stating that development should be limited	Either remove the paragraph or amend in line with the comments
P22	Figure 5	Check formatting of page as key and other text illegible.	See comment
P23	Figure 6	The key does not explain the numbering. We have wider concerns that by not explaining the proposals contained within the Urban Design Framework and summarised on this map the NDP may be seeking to give weight to and implement proposals that are not being made explicit in the document (and in the public consultation).	This depends upon the nature of the proposals in the Urban Design Framework and the extent to which these proposals have been made explicit through consultation on the NDP. If they have been made explicit, then the key for Figure 6 needs updating at the very least to clarify the nature of the site specific proposals.
P28	Planning Policy ES1: Green Infrastructure	The first 2 paragraphs are not necessary and repeat content of paragraph 3.	Remove para 1 and 2 from policy. Put para 1 as starting paragraph of explanation.

		Paragraph 1 of the policy should become the first paragraph of the Explanation text.	
P28 and P30	Explanation para 5, and Figure 8	Include a date (month and year) for when the masterplan was approved. The plan would perhaps be better presented without all the information in the key on the right.	See comments
P41	Policy E3, para 2	Change “seen favourably” to “supported”	See comment.
P45	Policy D1, para 1	Remove “must” as this is too prescriptive. The NPPF and Local Plan refer to “should”.	See comment
P50	Policy SF1: Community Facilities	Suggest the NDP includes a list of all community facilities that the policy refers to as Figure 15 is not as clear as it could be.	See comment.
P57	Policy T1: Car Parking	The first paragraph is in direct conflict with Stroud Local Plan policy which only provides for a level different to the published standards where a developer can justify their own parking provision through evidence including that it would not have a detrimental impact on the local road network.	Remove “ <i>especially development which provides higher levels of car parking than mandated in the Stroud Local Plan</i> ” and replace with “in accordance with Local Plan standards or where a developer can justify their own parking provision”.
	General	The following comment numbers from the Regulation 14 consultation response by Stroud District Council are still felt to be relevant: 12, 16, 20, 21, 22, 23, 36,	See Reg 14 SDC comments