

RESPONSE TO THE
STROUD DISTRICT LOCAL PLAN REVIEW DRAFT PLAN
FOR CONSULTATION NOVEMBER 2019

Standish Parish Council

(20 January 2020)

The Parish Council gratefully acknowledges the help of Andrea Pellegram Ltd in compiling this response.

General Comment

Standish Parish Council welcomes and supports the draft Local Plan insofar as it identifies the prospect and potential implications of climate change as an 'overarching priority issue for our District' (Key Issues P14) and includes, in particular, an associated strategic objective (SO5), a new Core Policy on delivering carbon neutrality by 2030 (DCP1), and associated Delivery Policies (ES1 and ES2).

Introduction

Planning Practice Guidance on Neighbourhood Planning states that:

Although a draft neighbourhood plan is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.

The Local Planning Authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest success at examination.

The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan.¹

This response from Standish Parish Council, which is the accountable body, is based upon evidence and emerging policy of the emerging Standish Neighbourhood Development Plan (SNDP).

Comments on the draft Local Plan (November 2019)

Core Policy DCP1 Delivery Carbon Neutral by 2030

The Parish Council supports this policy which is aligned to the draft NDP policy S2 on Major Developments.

Core Policy CP3: Settlement Hierarchy

The Parish Council has made many representations in the past regarding its ambiguous position in the Settlement Hierarchy. The changes reflected in para 2.13 clarify

¹ Planning Practice Guidance: Neighbourhood planning, 009 Ref ID 41- 009-20190509.

that the majority of Standish Parish (outside the strategic allocation) is now considered to be “countryside” which is what was reflected in the SNDP.

Core Policy CP4: Making Places

The wording in the policy should better reflect the importance of Neighbourhood Development Plans in making place.

The wording of the policy should be changed as follows (new text **INSERTED**):

All development proposals shall accord with the Mini Visions **AND, WHERE RELEVANT, NEIGHBOURHOOD DEVELOPMENT PLANS** and have regard to the Guiding Principles for that locality, as set out in this Plan and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents

Core Policy CP5: Environmental development principles for strategic sites

The draft policy should contain a principle reflecting the commitment to achieving carbon neutrality by 2030. The draft policy does not appear to be in conflict with the intentions of the SNDP policy S2 on Major Developments which provides a more stringent approach to development. The SNDP will be subject to its Regulation 14 Consultation in the early part of 2020 and should it be determined that there are any conflicts between the policies, it will be possible to address them at that time.

Core Policy CP6: Infrastructure and developer contributions

Planning Practice Guidance on viability states that:

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).²

² Planning Practice Guidance: Viability, 001, Ref. ID 10-001-20190509.

The SNDP and other neighbourhood plans in Stroud District also identify infrastructure requirements as part of the Development Plan policies for the area. However, the draft policy does not acknowledge this which might lead to risks when determining planning applications where applicants may argue that since NDP infrastructure is not identified in this policy, it is not necessary.

The wording of the policy should be changed as follows (new text **INSERTED**):

2. Securing contributions to all aspects of land use, infrastructure and services that may be affected by development, in accordance with the District Council's identified priorities and objectives, **OR THOSE OF MADE NEIGHBOURHOOD PLANS**, for delivering sustainable communities

Stonehouse Cluster

Site PS19a is referred to as "Northwest of Stonehouse". However, the site lies entirely within Standish Parish. The Local Plan ignores the important contribution by the historic Standish community that this strategic allocation will make.

The Parish Council requests that site allocation SP19a be referred to as "Standish" and not "Northwest of Stonehouse".

Draft Site allocation PS19a

The Parish Council and the SNDP Steering Group have attempted to enter into a dialogue with officers regarding the master planning principles for this strategic allocation. However, the extensive evidence that has been collected and the emerging SNDP policy have not been mentioned in this text. When the SNDP is made, that policy would have implications for the PS19a masterplan.

The wording of the policy should be changed as follows (new text **INSERTED**):

Detailed policy criteria will be developed **IN CONJUNCTION WITH THE STANDISH NEIGHBOURHOOD DEVELOPMENT PLAN** to highlight specific mitigation measures and infrastructure requirements and how development will prioritise walking,

cycling and public transport over the use of the private car. A development brief incorporating an indicative masterplan, to be approved by the District Council **AND IN DISCUSSION WITH THE LOCAL COMMUNITY**, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.

Overall, the policy fails to recognise the severe transport constraints to the development of PS19a. Two matters of greatest concern are the unsuitable access from the site over Black Bridge which cannot be used for reasons explained in the evidence in support of the SNDP, and the desirability of ensuring that the new development does not add traffic onto the B4008 between Stonehouse and Junction 12 of the M5.

Core Policy CP9: Affordable Housing (and relevant section of DHC1)

Within the Cotswolds AONB/designated rural parish of Standish, the policy states that sites capable of providing 4 or more dwellings (net) will be required to provide at least 30% affordable housing.

On a site of 4 houses, at least 30% affordable housing contribution would be 2 of 4 houses, or 50%. This might prove unviable as a 50% affordable housing contribution is significantly above the 30% target and an unusually high requirement nationally.

It is suggested that the policy should be rewritten as follows:

- 4-5 houses, a 20-25% target (one house)
- 6 -9 houses , a 30% target (two - three houses)
- 10 houses, a 30 % target (three houses)

Delivery Policy EI12: promoting transport choice and accessibility

SNDP and others such as the Stonehouse NDP, make specific recommendations with regard to sustainable access.

The wording of the policy should be changed as follows (new text **INSERTED**):

*Developers must take account of the proposals included within Stroud Infrastructure Delivery Plan, the Stroud Sustainability Transport Strategy, ~~and~~ the Gloucestershire Local Transport Plan **AND, WHERE RELEVANT, MADE NEIGHBOURHOOD DEVELOPMENT PLANS.***

The Parish Council would like to see a reference here to developing EV charging structure.

Delivery Policy DEI1: District-wide mode-specific strategies

Standish Parish Council welcomes this new policy, in particular the section on District-Wide Walking and Cycling Strategy.

With reference to the Background Paper: Sustainable Transport Strategy
Section A419/B4008/Interventions

Under the sub-heading 'Interventions in line with this approach to the (A419/B4008) corridor would include' the Parish Council recommends this additional point:

'A dedicated off-road cycle way for bicycles, pedestrians and other non-motorised users from the Horsemarling roundabout (Stonehouse/Standish boundary) to the Junction 12 roundabout'

Delivery Policy ES1: Sustainable construction and design

Standish Parish Council applauds the approach in this policy and has included similar (but not identical) policies in SNDP S2. The NDP will be subject to Regulation 14 consultation in early 2020 at which time the precise wording of SNDP S2 will be considered and aligned more closely with ES1.

Delivery Policy ES2: Renewable or low carbon energy generation

The Parish Council supports this policy.

Delivery Policy DES3: Heat Supply

The Parish Council supports this policy in principle but would like to see a more detailed approach in the final policy.

Delivery Policy ES3: Maintaining quality of life within our environmental limits

The Parish Council supports this policy.

Delivery Policy ES4: Water resources, quality and flood risk

The Parish Council supports this policy.

Delivery Policy ES5: Air quality

The Parish Council supports this policy

Delivery Policy ES6: Providing for biodiversity and geodiversity

The Parish Council supports this policy.

Delivery Policy ES7: Landscape Character

Standish Parish Council commissioned landscape architects Illman Young to prepare landscape evidence in support of the SNDP. The SNDP has included draft policies on landscape impacts for the proposed strategic development and also a series of landscape character areas based on this evidence. It is important that the SNDP evidence is acknowledged in this draft Local Plan policy.

The wording of the policy should be changed as follows (new text **INSERTED**):

The Stroud District Landscape Assessment **AND OTHER LANDSCAPE EVIDENCE** will be used when determining applications for development within rural areas.

Delivery Policy ES8: Trees, hedgerows and woodlands

In the wording of the first paragraph, the words WHERE APPROPRIATE should be deleted so that it reads “Development should seek to enhance and expand the District’s tree, hedgerow and woodland resource.”

Background Paper: Strategic Flood Risk Assessment

The Parish Council supports this policy, particularly the emphasis on Natural Flood Management in the Frome catchment.

Background Paper: Renewable Energy Resources Assessment

The Parish Council supports this policy.