

Regulation 14 Draft

**Standish Neighbourhood Development
Plan 2036**

Planning policy context

Evidence paper

(April 2020)

**Standish
Parish
Council**



INTRODUCTION

1. The purpose of this report is to set out the planning case for the introduction of a masterplan policy for Strategic Development Sites in the Standish NDP. It also reviews the Development Plan policy that other NDP policies must comply with.
2. The report is set out in two parts:
 - Part 1: This section summarises the available evidence and examines how it supports the proposed policy;
 - Part 2: This section is a factual review of the available planning evidence.

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PART 1: Summary of Development Plan policies

Summary of the evidence in this report

3. This report reviews a wide range of evidence considering the importance of the need to require a masterplan for strategic development in the Parish. The evidence is complex and varied in scope and some of the relevant evidence is in other evidence papers in this report. Therefore, to assist the reader, the main points that are drawn from all the evidence are set out in the box below.

The main conclusions that can be drawn from the examination of strategic Development Plan policy for Standish Parish

NDPs must be in general conformity with the strategic policies contained in any development plan that covers their area¹. The Development Plan includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies. Therefore, the Development Plan is the Stroud District Local Plan November 2015 (The Local Plan), the Minerals Local Plan. The Gloucestershire Minerals Local Plan 1997 – 2006; and, the Gloucestershire Waste Core Strategy (WCS). The Local Plan is currently under review and a Draft Local Plan was published in November 2019. Though it contains only potential sites for allocation, it will be given consideration in the development of the NDP policies.

The Stroud Local Plan was adopted in November 2015 and is the primary Development Plan document for the NDP. The plan identified a target of at least 11,400 dwellings in Stroud District between 2006 and 2031. Many have already been built or are firm commitments and the residual number of 3,615 dwellings is identified.

The largest confirmed allocation, set out in the 2015 Local Plan Core Policy CP2, is the site , SA2 now known as Great Oldbury, where 1,350 dwellings and 10 hectares of employment land have been allocated. CP2 clarifies that outside the strategic sites, development will take place according to the settlement hierarchy and new housing development should generally take place within designated settlement development limits. Only limited development will take place outside of these designated areas. Only a small portion of this

¹ National Planning Policy Framework 2018, footnote 16.

site lies within Standish Parish and most of the land is therefore under the consideration of Eastington and Stonehouse NDPs.

In the settlement hierarchy, Stonehouse is designated as a Tier 1 settlement (most sustainable) and Standish is so sparsely populated and rural in character that it does not even register for the lowest tier in the hierarchy, Tier 5. Standish parish is therefore unclassified and must therefore logically be considered countryside. According to the Local Plan CP2 therefore, only limited development will be permissible, except under paras. 79 and 83 of the National Planning Policy Framework (NPPF).

The emerging Minerals Local Plan has identified PS19a/South Standish as being on a Minerals Resource Area for Sand and Gravel and Emerging Minerals Local Plan Safeguarding Area. These designations must be considered when determining how to safeguard the identified minerals resource.

The Stonehouse NDP seeks to protect views over Standish towards the escarpment and also to ensure that new development, such as that at SA2, will create a robust network of accessible cycle and pedestrian routes that will also function as wildlife corridors.

The Stroud Local Plan is currently under review. A Draft Local Plan was published in November 2019. The draft Local Plan seeks to allocate a site for 650 home and 5 hectares of employment land on the site identified as PS19a/South Standish which lies entirely within Standish Parish.

The Draft Local Plan has identified a need to increase its housing allocations by 40% over the next plan period, from the current level of 456 homes built annually to at least 638 homes annually. Over the future plan period to 2036, there is now a requirement to identify land to meet an additional 5,700 homes. The new demand will be met on a mixture of brownfield and greenfield sites.

The Draft Local Plan proposes that Stonehouse will remain in Tier 1 and Standish remain unclassified (though it is now mentioned in supporting text) and where only very limited development will be allowed.

This NDP has been prepared to address the challenges identified in the Draft Local Plan. Planning Practice Guidance on neighbourhood planning allows an NDP to consider policies in an emerging Local Plan and encourages the planning authority and the qualifying body (in this case, Standish Parish Council) to work together to agree an approach that minimises any conflicts between policies in the neighbourhood plan and the emerging Local Plan.

Therefore, to be prudent, in this Regulation 14 draft NDP (i.e. the version that will be subject to public consultation before submission to the planning authority) the NDP will contain a policy that anticipates the possibility that a strategic allocation might be forthcoming. If no development were to occur (because no allocation had been made), the

policy would not be used and by the same argument, rendered redundant (or dormant). However, should the allocation be made, the NDP will remain up to date and will not require an immediate review upon adoption of the new Local Plan.

4. The Vision for Standish 2036:

- New housing is carbon neutral with higher standards than other development
- There will be access to a good range of community infrastructure
- Most homes will be on standard sewers, on mains water and will have access to Broadband
- There will be a new village centre that will serve the whole community
- Light pollution is controlled
- Black Bridge does not become a road that would lead to rat running to the B4008 and noise and light pollution in rural areas

5. The NDP will require that a masterplan is prepared for PS19a/South Standish that will enable the Parish Council on behalf of the parishioners to be involved in the masterplan and delivery of the site. The objectives from the Vision will be delivered through joint work between developers and the Parish Council. Development management of the strategic site should therefore address the following principles:

- A masterplan will be prepared in consultation with the Standish Parish Council and meaningful pre-application engagement will take place that will allow the Standish Community to have their views reflected in the overall site layout and access;
- The new development(s) will pay regard to the existing community and will allow equal access to all parishioners, whether this be transport access or social/community access. The masterplan will need to demonstrate that there are effective transport links between new community infrastructure and the existing community, and that all members of the Standish community will be able to participate equally.
- The masterplan will need to demonstrate how effective multi-user sustainable transport links with integral wildlife corridors will link between Strategic site SA2 and Stonehouse through the development to the remainder of Standish and how these links will encourage access to the countryside for health, recreation and sustainable transport.
- Access to the site will avoid encouraging greater use of the B4008 for motorised vehicles.

- Green infrastructure will be provided in the form of allotments, parks and recreation grounds, children’s play areas, youth access and Accessible Natural Greenspaces to meet identified under provision.
- Developers will be asked to work with the Parish Council in the design phase to identify means of minimising the carbon impacts.
- New development will be designed, landscaped and oriented in such a manner to avoid all unnecessary light pollution into the countryside. The use of street lights at the edges of the development facing the countryside will be strongly resisted.
- New development will be on mains sewers and have faster broadband.

PART 2: REVIEW OF RELEVANT PLANNING EVIDENCE

The Development Plan

6. NDPs must be in general conformity with the strategic policies contained in any development plan that covers their area². The Development Plan includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies. Therefore, the Development Plan is the Stroud District Local Plan November 2015 (The Local Plan), the Minerals Local Plan, The Gloucestershire Minerals Local Plan 1997 – 2006 and the Gloucestershire Waste Core Strategy (WCS).

Stroud Local Plan 2015

7. The Stroud Local Plan was adopted in November 2015 and is the primary planning policy document for the NDP. The plan identified a target of at least 11,400 dwellings between 2006 and 2031. Many have already been built or are firm commitments and the residual number of homes that the plan must identify is 3,615 dwellings.
8. The largest allocation, set out in Core Policy CP2, is the site SA2/Great Oldbury where 1,350 dwellings and 10 hectares of employment land have been allocated. CP2 clarifies that outside the strategic sites, development will take place according to the settlement hierarchy and new housing development should generally take place within designated settlement development limits. Only limited development will take place outside of these designated areas. SA2/Great Oldbury is almost entirely outside but adjacent to Standish Parish.
9. Core Policy CP3 sets out the settlement hierarchy for the District. It sets out 5 tiers, where Stonehouse is a Tier 1 location (an “Accessible Local Service Centre” which will continue to provide significant levels of jobs and homes and support community facilities and infrastructure) and Tier 5 (“Unclassified” areas that have a lack of basic facilities to meet day to day requirements). It is important to note that Standish Parish is so sparsely populated and un-nucleated that it fails even to register as a Tier 5 settlement. Standish parish is “more unclassified” than the formally unclassified settlements in the hierarchy. However, assuming that Standish were a Tier 5 location, the policy indicates that there could only be scope for limited development in these areas, “should this be required to meet specific needs identified by these communities in any Neighbourhood Plans.”

² National Planning Policy Framework 2018, footnote 16.

10. Core Policy CP5 sets out the environmental development principles for strategic sites. For the purposes of the NDP, this policy will become critical in support of Policy S2: Strategic Development and S4: Housing Allocation. It will therefore be repeated in full here.

Core Policy CP5: Environmental development principles for strategic sites

Strategic sites will:

1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms
2. Be low impact in terms of the environment and the use of resources
3. Be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars
4. Have a layout, access, parking, landscaping and community facilities in accordance with an approved indicative masterplan
5. Be located to achieve a sustainable form of development and/or support regeneration. Development proposals should incorporate a negotiated design code/framework.

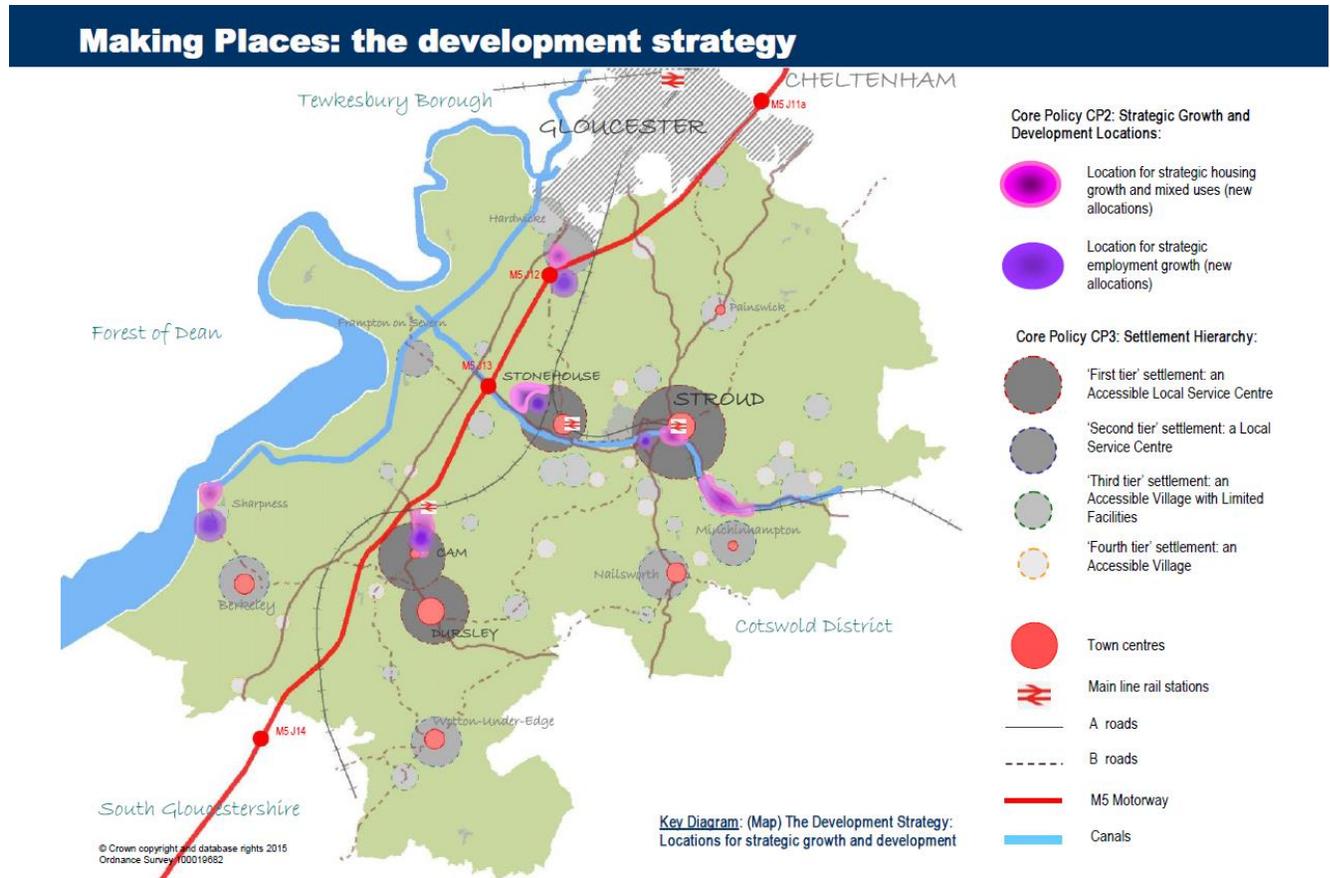
Applications for all strategic sites (both residential and non-residential) will be required to provide a statement demonstrating how sustainable construction principles have been incorporated. This should address demolition, construction and long term management. This will be expected to show how the proposal maximises its contribution towards the following objectives:

- A. Sustainable sourcing of materials and their efficient and appropriate use, including their durability
- B. Minimising waste and maximising recycling
- C. Incorporating Sustainable Drainage Systems
- D. Minimising water consumption
- E. Minimising energy consumption and improving energy performance
- F. Minimising net greenhouse gas emissions of the proposed development
- G. Maximising low or zero carbon energy generation.

Where the Council considers it could be likely that the proposal will result in significant adverse environmental effects during the construction phase, a Construction Environmental Management Plan (CEMP) will be required.

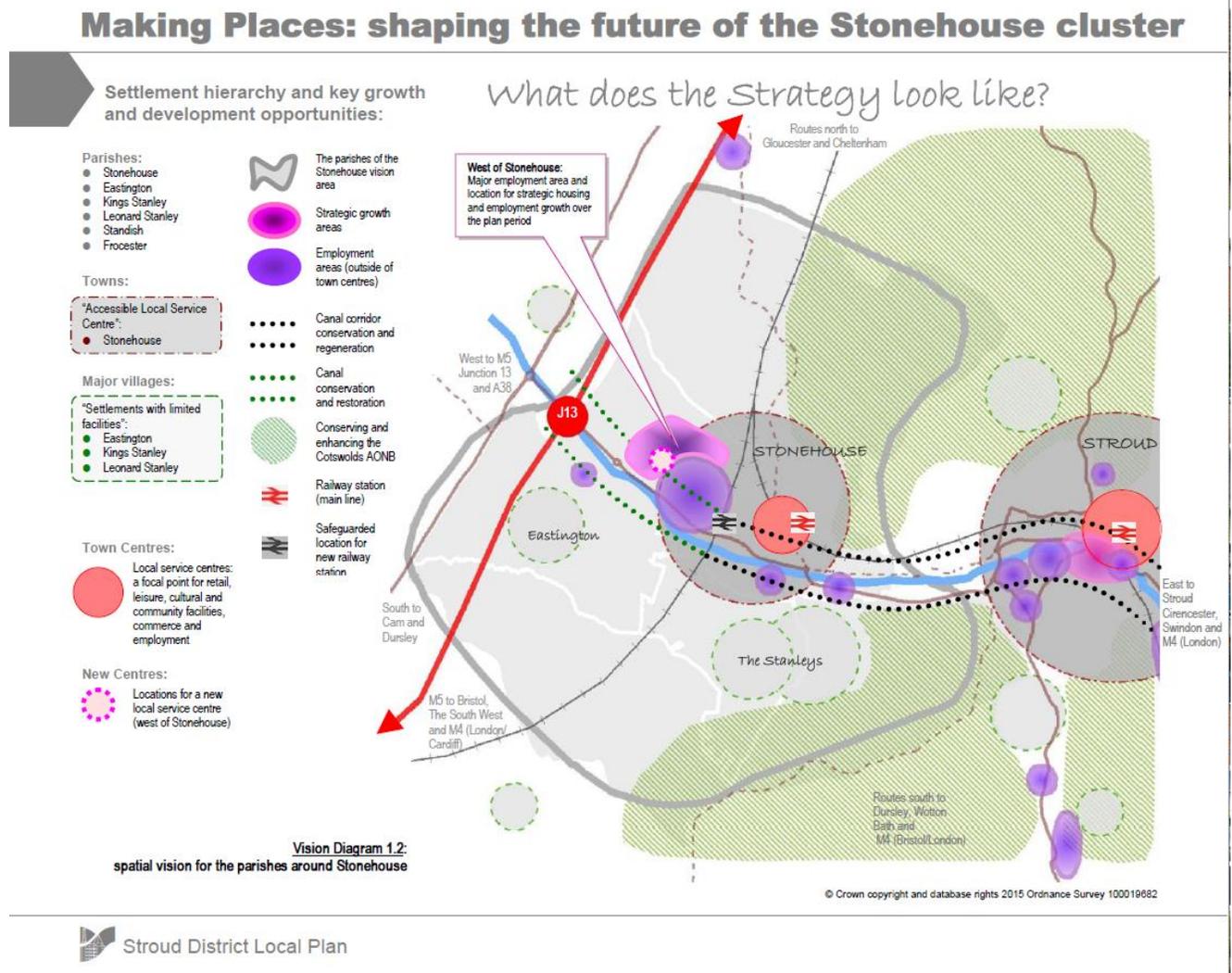
11. Core Policy CP6 discusses how CIL and developer contributions will ensure that infrastructure will be in place at the right time to support the development strategy.
12. Core Policy CP8 sets out how new housing, including that on strategic sites, will be delivered, including reference to density, townscape, sustainable transport accessibility, access to services, layout, sustainable construction techniques and reduction in greenhouse gas emissions. Major development schemes will be expected to enhance biodiversity and where appropriate through a network of multi-functional green spaces.
13. The Development Strategy is set out in the Local Plan Key Diagram which is replicated below in **Figure 1**. Standish lies directly north of Stonehouse on the diagram.

Figure 1: Stroud Local Plan 2015 Key Diagram



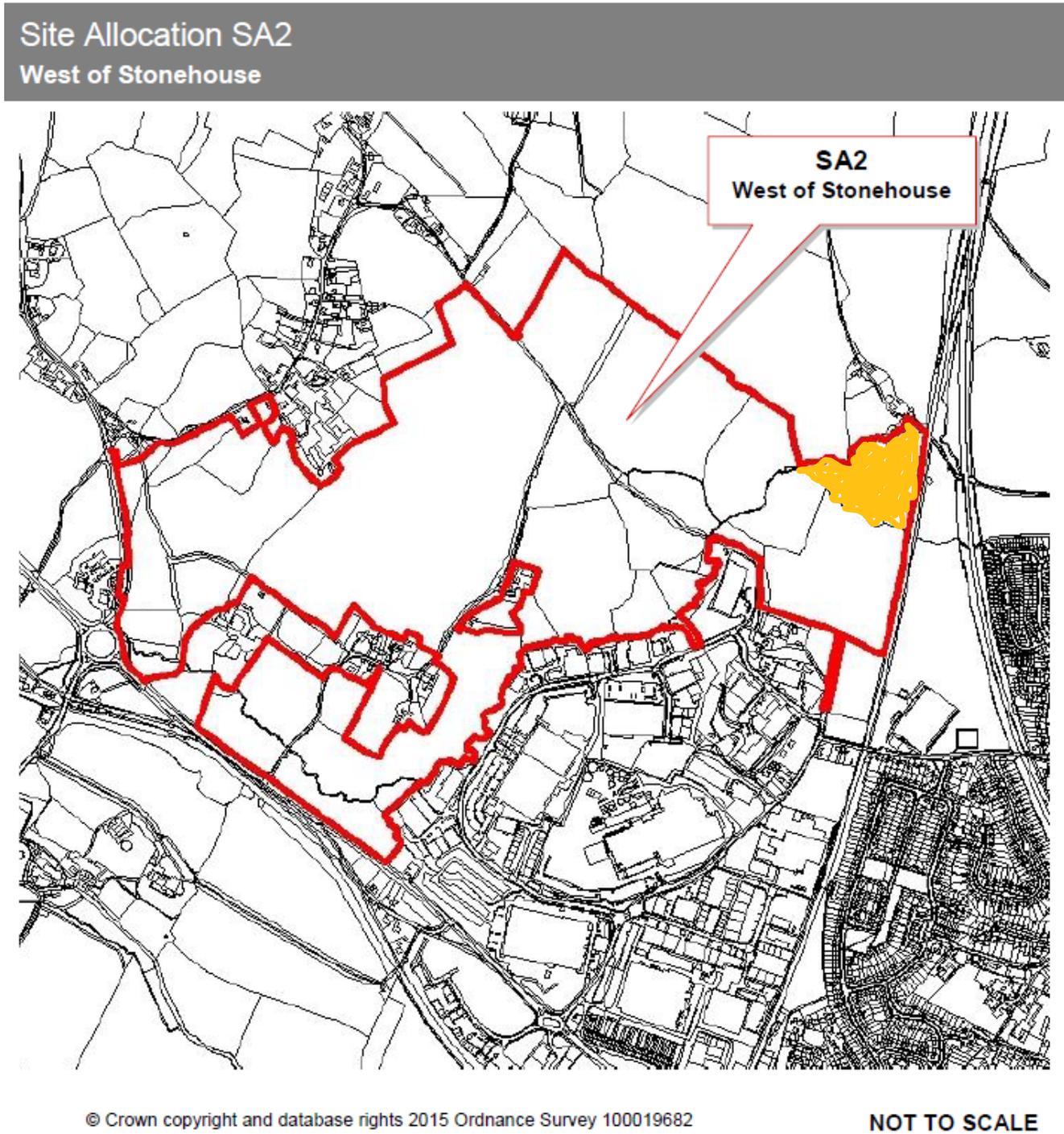
- Standish is located in the "Stonehouse cluster strategic growth area". The cluster's vision is set out in pages 52 to 59 of the Local Plan. Stonehouse cluster has a population of around 13,400 people, of which 7,700 live in Stonehouse. Standish is identified as amongst the most sparsely populated parishes in the District with no defined settlement and a strong rural character.
- The vision to 2031 states, amongst other things, that growth and development will be minimal outside of the strategic location West of Stonehouse, the area will continue to benefit from strong, well-balanced residential communities both rural and urban. The Vision Diagram for the Stonehouse Cluster is replicated below. It shows clear East/West rail and road links, the strategic growth area west of Stonehouse and employment areas. It makes no identification and offers no discussion about Standish Parish.

Figure 2: Local Plan key diagram of Stonehouse Cluster



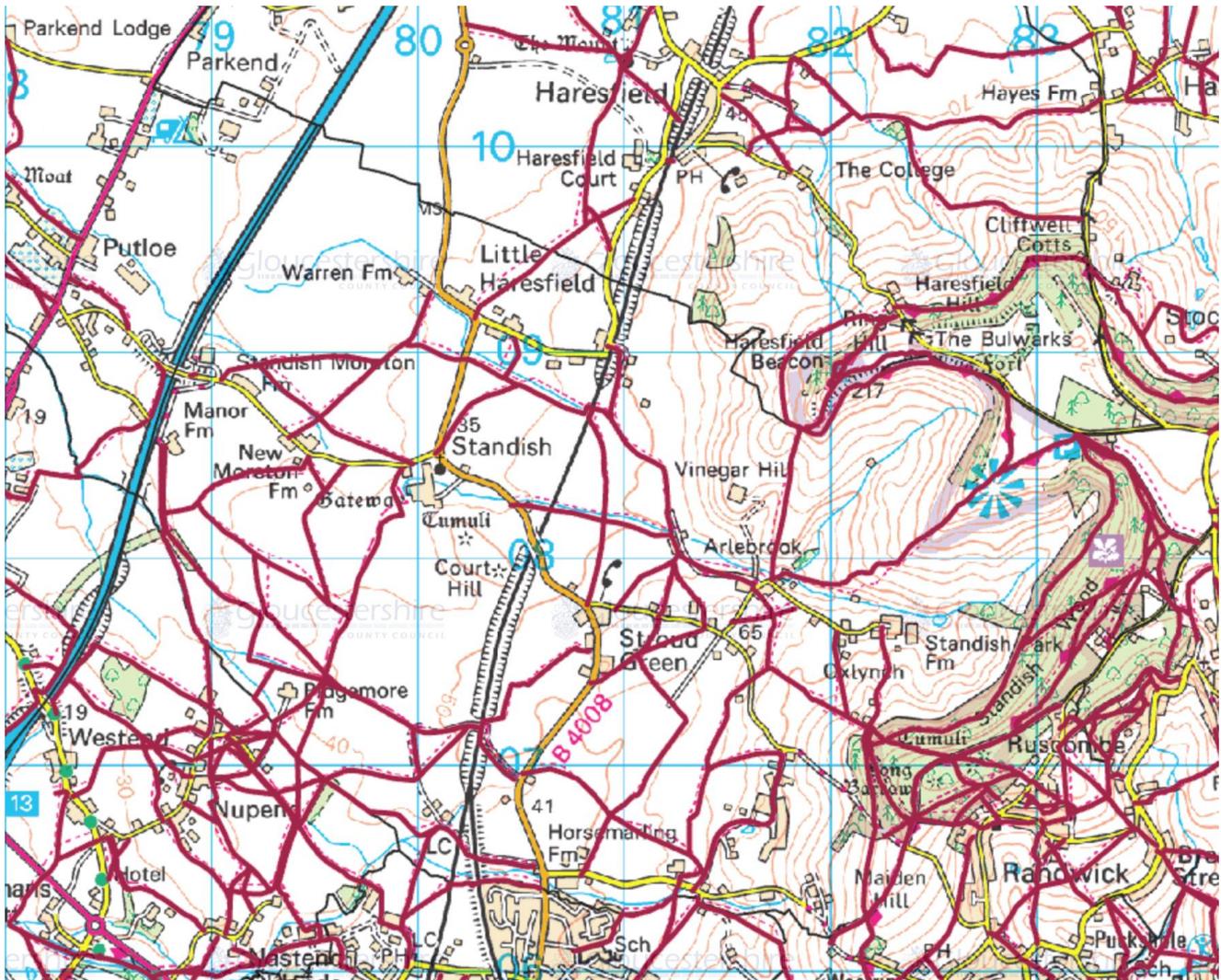
16. The allocation west of Stonehouse is set out in Site Allocations Policy SA2 shown in **Figure 3**. The policy makes provision for 1,350 dwellings, including 30% affordable and 10 hectares of employment land. The allocation requires provision of a local centre, primary school, contributions to community services, green space and recreational facilities amongst other things. Cycle and pedestrian routes throughout the development are required but there is no specific reference to linkages to Standish. Vehicular access will be from the A419 Chipmans Platt roundabout and from Oldends Lane. The allocation is replicated below. The area shown in amber lies within Standish Parish.

Figure 3: Site Allocation SA2 from the Stroud Local Plan 2015



17. In terms of transport and travel, Standish is identified in Local Plan Fig. 7 as “difficult: some services inaccessible by public transport or travel times greater than 30 minutes” based on average travel times.
18. Delivery Policy EI13 protects and extends the cycle routes in the district. Major development is required to connect to nearby established pedestrian and cycle routes. The map in **Figure 4** shows the existing public rights of way in Standish to which this policy applies.

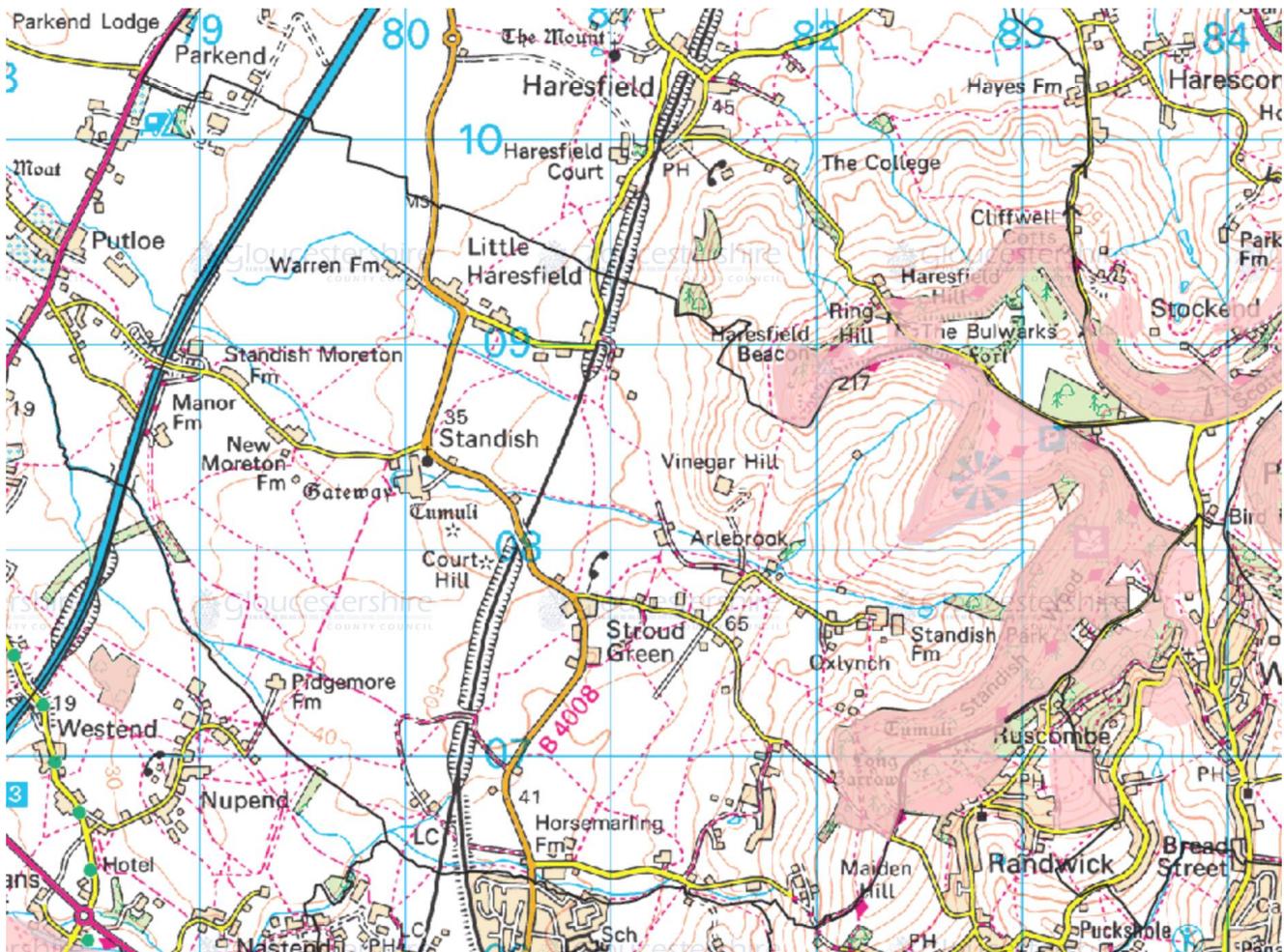
Figure 4: Public Rights of Way (red lines)



Source: Gloucestershire Minerals and Waste Proposals Map,
<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>

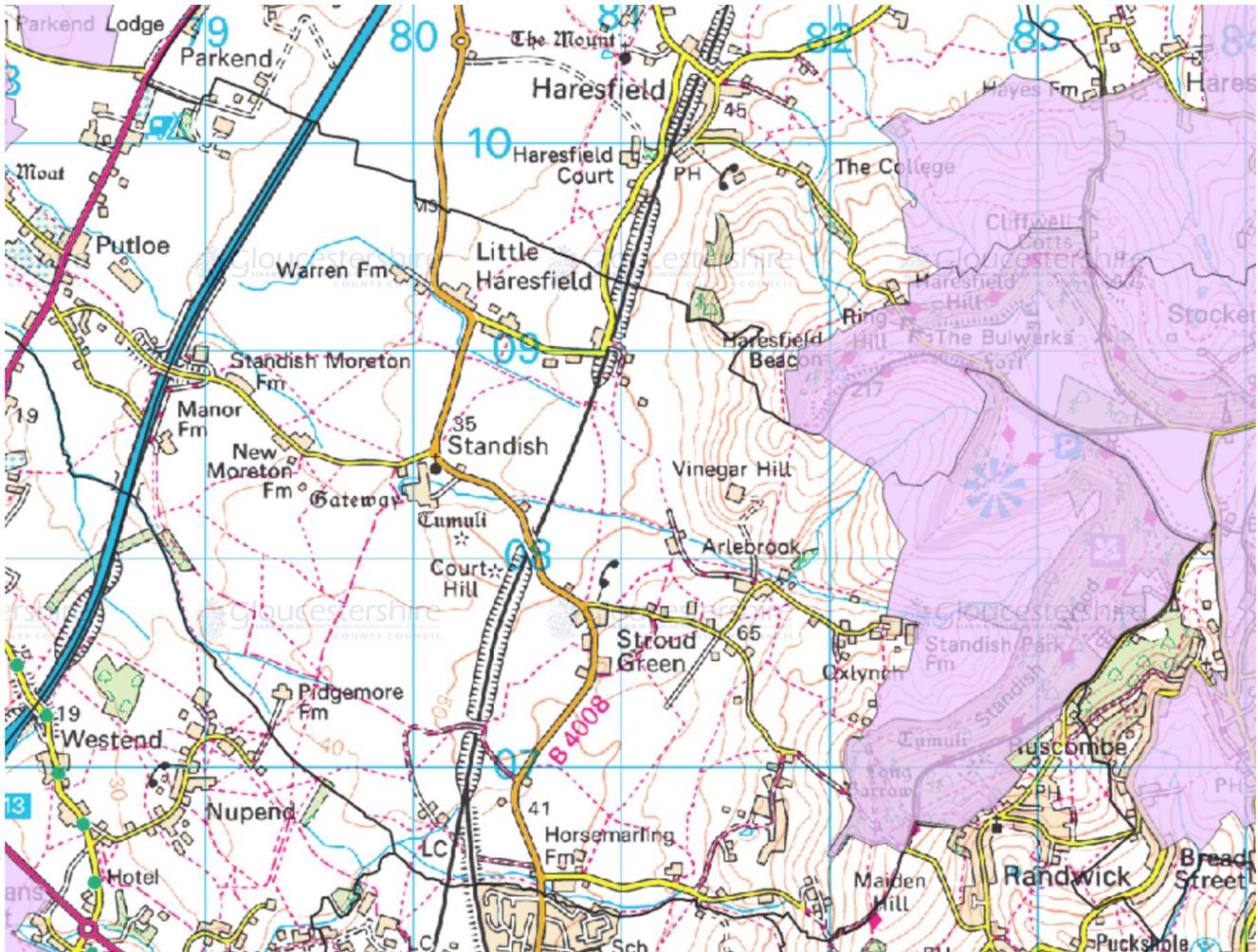
19. Core Policy CP15 sets out how development outside of settlements will be allowed. This policy applies to Standish in its entirety, except for the small portion of SA2 which lies within the Parish boundaries. This policy sets forth the principle that there will be no development outside the identified settlement development limits (i.e. all of Standish parish) unless for very specific circumstances as set out in the policy.
20. Delivery Policy ES1 sets out criteria for sustainable construction and design.
21. Delivery Policy ES6 requires new development to conserve and enhance the natural environment, whether or not they have statutory protection. **Figure 5** shows key wildlife sites in Standish, and **Figure 6** shows Strategic Nature Reserves to which this policy applies.

Figure 5: Key Wildlife Sites (pink shading)



Source: Gloucestershire Minerals and Waste Proposals Map,
<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>

Figure 6: Strategic Nature Reserve (pink shading)



22. Source: Gloucestershire Minerals and Waste Proposals Map, <https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>
23. Delivery Policy ES4 requires strategic flood risk assessments and sets out how development in areas subject to surface water flooding should introduce appropriate mitigation. **Figure 7** shows Flood Zone 3 areas in Standish Parish.

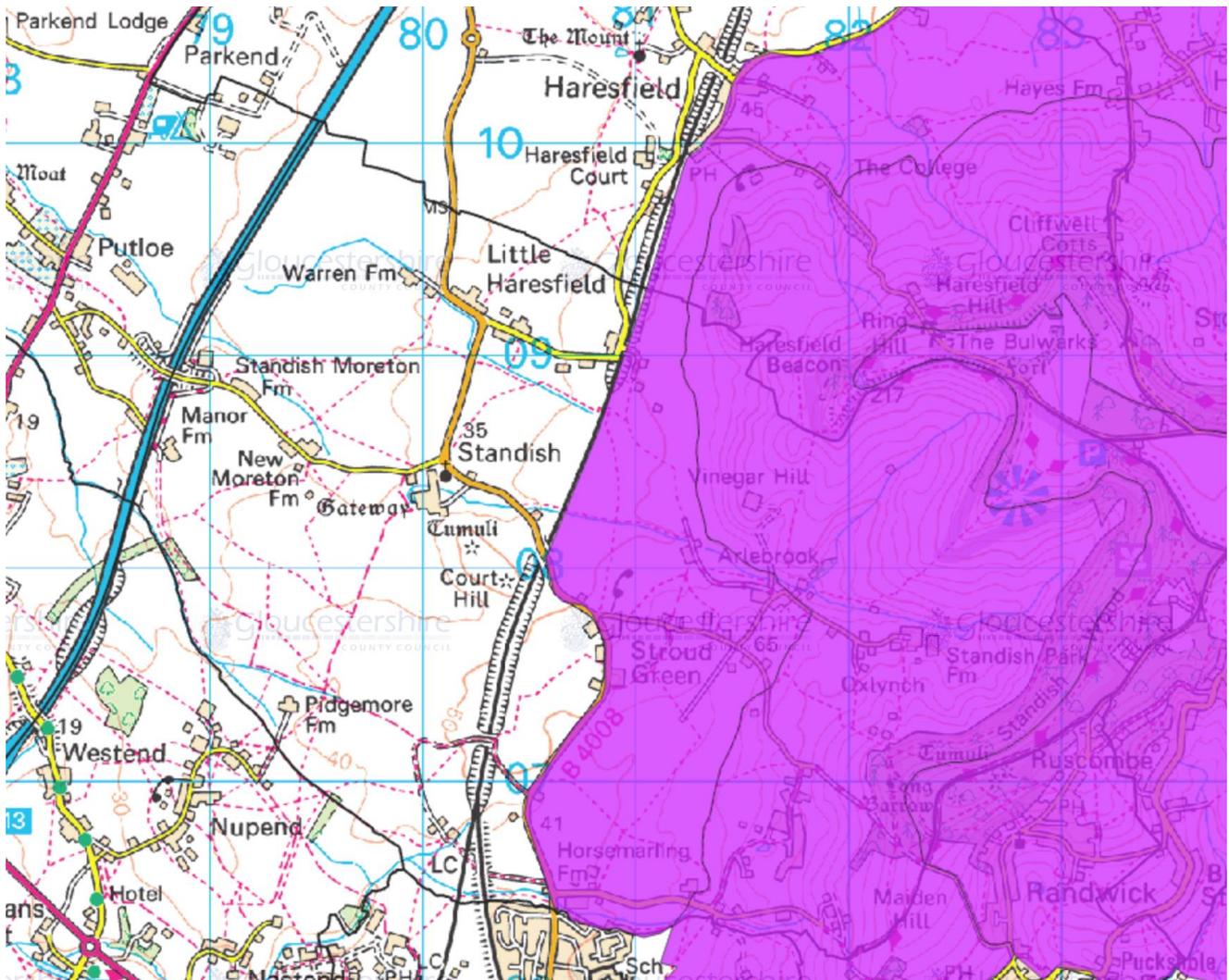
Figure 7: Flood Zone 3 (yellow hatch)



Source: Gloucestershire Minerals and Waste Proposals Map,
<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>

24. Delivery Policy ES7 on Landscape Character gives priority to the conservation and enhancement of the natural and scenic beauty of the landscape, especially within and affecting the setting of the Cotswolds AONB. Development proposals should conserve or enhance the special features and diversity of the different landscape character types in the district. Natural features including trees, hedgerows and water features that contribute to the landscape character and setting of the development should be both retained and managed appropriately in the future. Reference is made to the Stroud District Landscape Assessment. **Figure 8** shows the extent of the Cotswold AONB in Standish Parish.

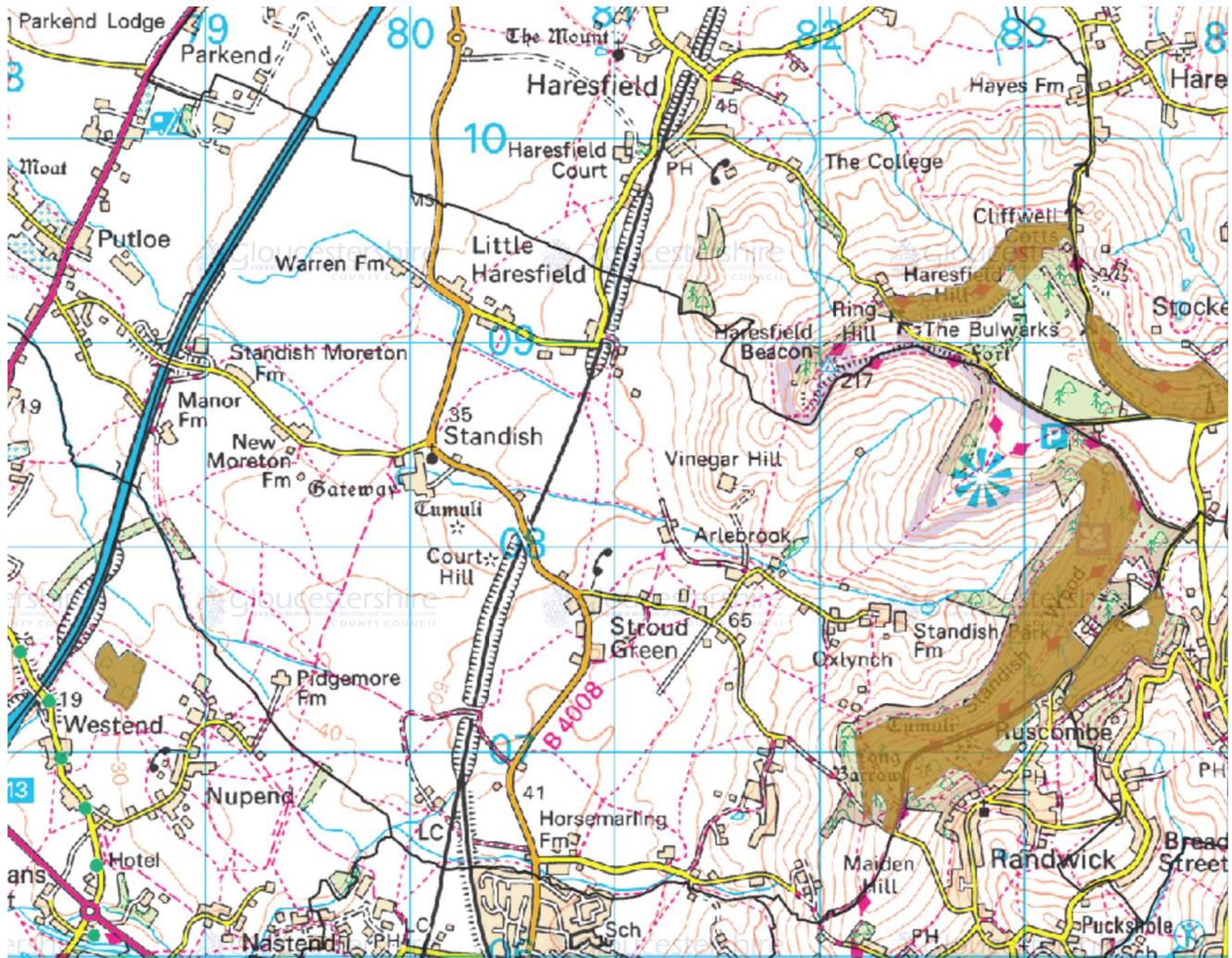
Figure 8: Cotswold Area of Outstanding Natural Beauty (magenta shading)



Source: Gloucestershire Minerals and Waste Proposals Map,
<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>

25. Delivery Policy ES8 sets out that new trees and woodland resources would be welcomed, and existing protected and non-protected but valuable trees will be protected from unacceptable loss. **Figure 9** shows ancient woodland that is protected under this policy.

Figure 9: Ancient Woodland (brown shading)



Source: Gloucestershire Minerals and Waste Proposals Map,
<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>

26. Delivery policy ES10 preserves, protects and enhances the historic environment including designated assets and ancient monuments. The policy also makes provision to enhance key views and vistas, especially of the spires and towers of historic churches. **Figure 10** shows listed buildings in Standish Parish to which this policy applies. The following photos show the Parish Church and associated buildings and structures.

Figure 10: Listed Buildings (red)



Source: Gloucestershire Minerals and Waste Proposals Map,
<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>







The Draft Local Plan

27. The Stroud District Local Plan Review Draft for Consultation was released in November 2019. It proposes material changes for Standish Parish. Though not clearly stated in the title or introduction, it appears that the plan period extends to 2040.
28. The draft local plan seeks to move the District to being carbon neutral by 2030 and ensure that demand for new housing is met. The Draft Local Plan's development strategy will distribute at least 12,800 additional dwellings and sufficient new employment land to meet needs for the next 20 years.³ The residual requirement for new housing, taking account of permissions and commitments is at least 8,000 dwellings.⁴
29. The strategy will concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure.⁵ At Tier 4a and 4b settlements, in addition to rural exception sites, the development of small sites of up to 9 dwellings outside settlement development limits will be supported in the interests of maintaining social sustainability, provided that the policy is supported by the local community.⁶
30. A new policy Core Policy DCP1 has been introduced which seeks to achieve carbon neutral development by 2030.
31. Core Policy CP2 identifies a need for 5 hectares of employment land and 650 new dwellings in "Stonehouse North West" which is a misnomer as the site lies entirely within Standish Parish. This NDP will seek to rename the site so that it reflects its geographical context. Limited development will take place outside of designated areas.
32. Very small settlements not mentioned in the settlement hierarchy will be treated as open countryside, where development will be restricted to that which contributes to diverse and sustainable farming enterprises, recreation, tourism, or involves the conversion of rural buildings and the provision of essential community facilities, in accordance with Core Policy CP15.⁷
33. Core Policy 3 sets out the Settlement Hierarchy and identifies Stonehouse as a Tier 1 Main Settlement. Standish Parish is not mentioned within the settlement hierarchy and therefore remains (as in the adopted Local Plan) as unclassified in the settlement hierarchy.

³ Draft Local Plan, November 2019, para 2.11.

⁴ Draft Local Plan, November 2019, para 2.44.

⁵ Draft Local Plan, November 2019, para 2.13.

⁶ Draft Local Plan, November 2019, para 2.19.

⁷ Draft Local Plan, November 2019, para 2.13.

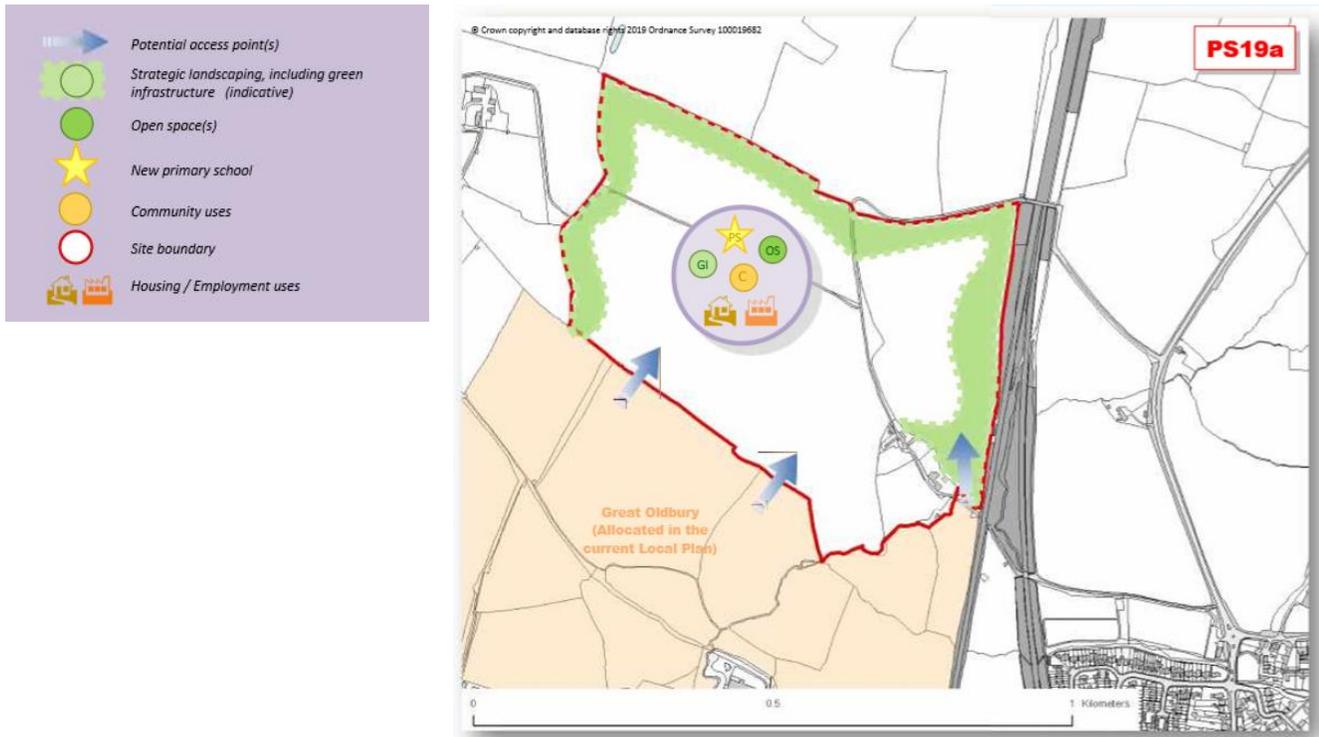
34. Core Policy 4 requires development proposals to accord with the Mini Visions for specific localities.
35. Core Policy 5 sets out environmental development principles for strategic sites.
36. Standish Parish lies within the Stonehouse Cluster. Stonehouse is a Tier 1 settlement, but Standish is acknowledged to be “amongst the most sparsely populated parishes in the District, with a strong rural character”.⁸
37. Standish Parish which is the location for strategic allocation 19a is referred to as “Stonehouse” in the Draft Local Plan.
38. PS19a/South Standish is described as follows:

PS19a/South Standish Northwest of Stonehouse: Land Northwest of Stonehouse (in Standish Parish), as identified on the policies map, is allocated for a strategic mixed use development, including 5ha employment, 650 dwellings, primary school, strategic landscaping and green infrastructure along the northern, western and eastern boundaries and associated community and open space uses. Detailed policy criteria will be developed 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, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.

39. **Figure 11** shows the proposed site allocation.

⁸ Draft Local Plan, November 2019, page 80.

Figure 11: Draft Site allocation, PS19a, Northwest of Stonehouse (referred to in the NDP as South Standish)



Minerals Local Plan

40. The Minerals Local Plan makes no specific allocations for Standish.
41. The Emerging Minerals Local Plan (EMLP) for Gloucestershire (2018 - 2032) was submitted to the Secretary of State in December 2018 and was expected to be subject to a Local Plan inquiry in 2019. Its policies are therefore material (according to paras. 49 and 50 of the NPPF) though it is not yet formally part of the Development Plan.

42. The EMLP states in paras. 100 and 101 that:

Primary minerals are a finite natural resource that should be afforded protection for the benefit of future generations. Primary minerals can only be worked where they occur and with increasing pressure on land from different uses, are potentially at risk of being sterilised.

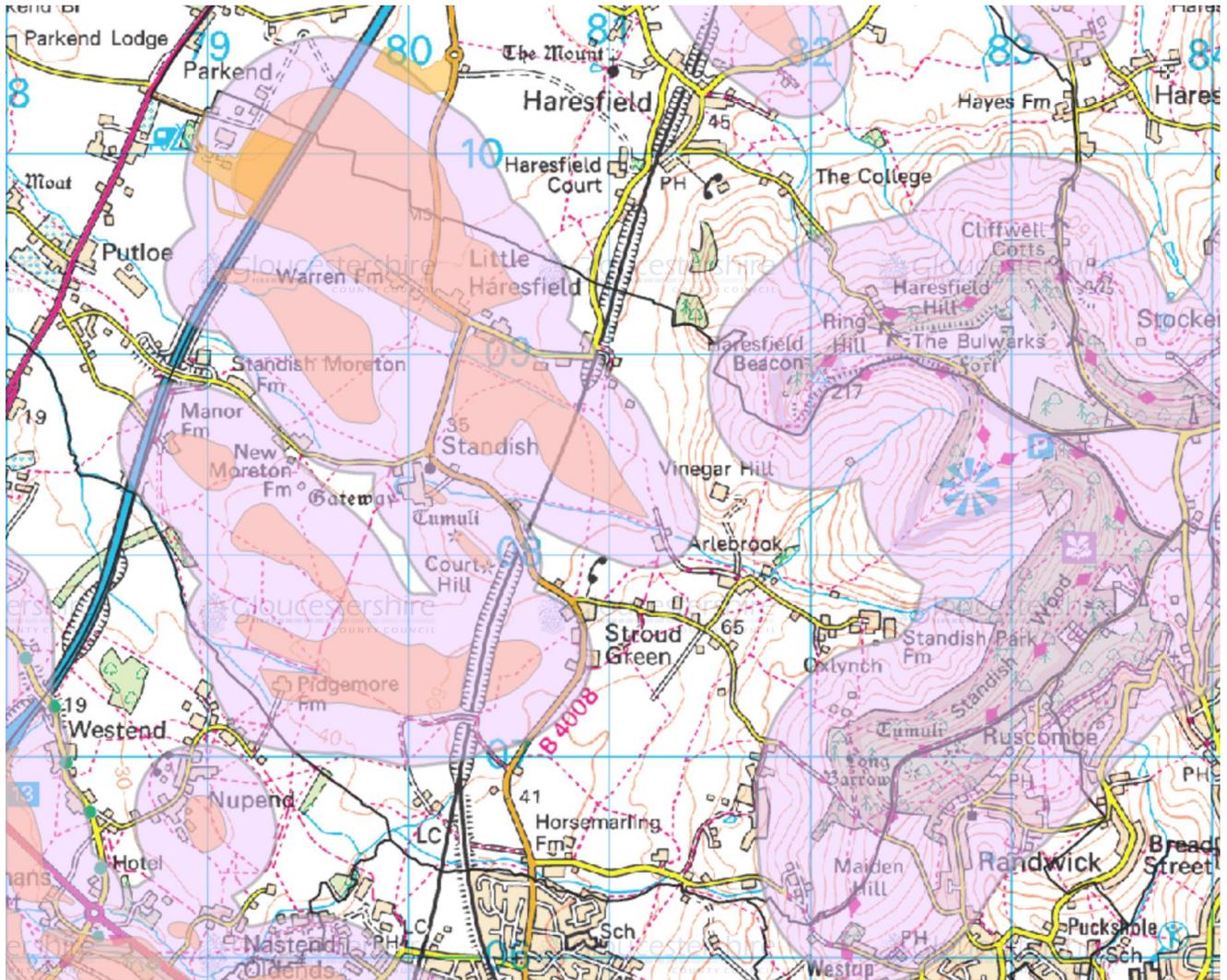
Sterilisation happens when surface development overlays, obstructs access to, and/or constrains the ability to work primary mineral resources. Without the opportunity to overcome these issues by way of demolition and site clearance, mineral resources become unusable and are effectively lost.

43. EMLP policy MSO1 sets out the criteria by which development will be allowed in a minerals safeguarding area shown in **Figure 12**. The policy will allow minor and householder development, but stipulating that other development, including strategic housing allocations, must be subject to the tests in the policy. The policy is copied below:

MSO1: Non-mineral developments within a Mineral Safeguarded Area (MSA) will be permitted provided: -

- I. it is exempt as set out in the list contained in table 2; or
 - II. needless sterilisation of mineral resources will not occur; or
 - III. the mineral concerned is not economically valuable; or
 - IV. it is appropriate and practicable to extract the mineral prior to development taking place; or
 - V. the overriding need for the development outweighs the desirability to safeguard mineral resources.
44. Policy DM01 protects the amenity of nearby communities from impacts arising from minerals extraction.

Figure 12: Minerals Resource Area for Sand and Gravel (salmon shading) and Emerging Minerals Local Plan safeguarding area (pink)



Source: Gloucestershire Minerals and Waste Proposals Map,
<https://gis.gloucestershire.gov.uk/LocalViewPub/Sites/MINWASTE3/>

Gloucestershire Waste Core Strategy

45. Core Policy WCS6 of the WCS allocates Javelin Park for an energy from waste (EFW) facility. Amidst strong public objection, the LPA refused the application on 5th March 2012 despite the WCS allocation. The decision was appealed, and this was allowed on 23 July 2015. Javeline Park EFW is visible from much of the parish and Urbaser Balfour Beatty, the contractors, predicted 336 vehicles, of which 208 are HGVs, would visit the site daily via the B4008 which traverses the parish. These vehicles will not be allowed in Standish Parish due to weight restrictions. Therefore, though it is outside the Parish boundaries, the Javelin Park EFW has a noticeable impact upon the parish residents.

Stonehouse Neighbourhood Plan (February 2017)

46. Stonehouse is the neighbouring Parish to the South of Standish and is the location for the strategic housing allocation SA2. It is also the nearest settlement for Standish residents. Should Strategic allocations be made at PS19a (which is in Standish), this settlements will remain within Standish but will for most intents and purposes be an extension to the Stonehouse settlement. The Stonehouse NDP is therefore relevant to the preparation of the Standish NDP.
47. Policy T1 Pedestrian Routes requires that development proposals which result in the closure or diversion of such routes should protect the existing rights of way network and its ambience. Where public footpaths or bridleways are routed or realigned through new development, where possible, they should be designed as part of landscaped wildlife corridors rather than being routed along estate road pavements as part of the highway network and should be accessible to all including wheelchair users. This policy is relevant to the Standish NDP because it will be necessary to carry the policies onwards into Standish for PROW and wildlife corridors and to ensure that effective linkages are maintained across the parish boundary.
48. Policy T2 requires new development, where appropriate, to provide safe, convenient and pleasant pedestrian routes to the town centre which are designed to act as wildlife corridors and area accessible to pushchair and wheelchair users.
49. Policy T3 requires that new and improved cycle and pedestrian routes should be designed where feasible to be accessible for safe use by those using mobility scooters, and, be designed to act as wildlife corridors.
50. Policy T6 ensures that new cycle links are provided to the town centre. It will be necessary for these to link to similar infrastructure in Standish.
51. Policy ENV6 highlights the importance of the views and vistas from Stonehouse to Haresfield ad Standish hills to the north and east.

Low-carbon neighbourhood planning

52. “Low-carbon neighbourhood planning, A guide to creating happier, healthier, greener communities”, (January 2018, Centre for Sustainable Energy) is a guide to help neighbourhood planning groups implement measures to tackle climate change and improve sustainability in their areas. It is not part of the Development Plan, but is evidence in support of NDP Policies S2: Strategic Development, and S4: Housing Allocation.
53. The energy efficiency of new residential buildings is controlled by Building Regulations and it is beyond the scope of the neighbourhood plan to require more stringent standards. However, it is possible for developers to voluntarily improve standards, and the Parish Council will seek to work with developers to achieve the maximum level of low-carbon design and construction.