

## **STANDISH NEIGHBOURHOOD PLAN REGULATION 14 PUBLIC CONSULTATION**

# **REPRESENTATIONS SUBMITTED ON BEHALF OF ROBERT HITCHINS LTD AND REDROW HOMES LTD**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004  
LOCALISM ACT 2011**

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## CONTENTS:

	Page No:
1. INTRODUCTION	1
2. THE VISION FOR STANDISH	3
3. STANDISH DEVELOPMENT FRAMEWORK	7
4. STRATEGIC DEVELOPMENT SITES	10
5. SUSTAINABLE TRANSPORT	17
6. SITE ALLOCATION AT STAGHOLT FARM	20
7. CONCLUSIONS	21

## APPENDICES:

APPENDIX 1 – LAND NORTH WEST OF STONEHOUSE (WITHIN STANDISH PARISH) -  
POSITION STATEMENT

APPENDIX 2 – MHP LANDSCAPE REPORT

## **1. INTRODUCTION**

- 1.1 Pegasus are instructed to submit representations to the Standish Neighbourhood Development Plan 2040 (July 2021) (SNDP) Regulation 14 public consultation on behalf of Robert Hitchins Ltd and Redrow Homes Ltd.
- 1.2 Pegasus submitted representations on behalf of our client to the previous Standish Neighbourhood Development Plan 2036 (April 2020) consultation in July 2020.
- 1.3 Our client welcomes the opportunity to comment on the emerging NDP and looks forward to ongoing and constructive engagement with the Parish Council in bringing forward a part of draft allocation PS19a – Stonehouse North West included in the emerging Stroud Local Plan Review Pre-Submission Draft Plan Regulation 19 Consultation (May 2021)<sup>1</sup> document.
- 1.4 PS19a is referred to as 'South Standish' in the SNDP and further to consultation with the Parish Council our client's representations to the recent Stroud Local Plan Review Regulation 19 consultation referred to the site as Land North West of Stonehouse (within Standish Parish).
- 1.5 For the purposes of these representations the site will be referred to as PS19a - Land North West of Stonehouse (within Standish Parish) to ensure continuity with representations Pegasus submitted to Stroud District Council to the Stroud Local Plan Review Pre-Submission Draft Plan Regulation 19 Consultation in July 2021.
- 1.6 At the outset the considerable time and effort put into the preparation of the revised Regulation 14 Neighbourhood Plan document and its associated evidence base by the local community is acknowledged and the following representations are not intended in any way to be critical of this considerable effort.
- 1.7 These representations seek to amend any factual inaccuracies in the Regulation 14 consultation documents insofar as they relate to the development plan process or our client's land interests.
- 1.8 The representations also refer to the evidence already prepared and submitted to Stroud District Council with regard to the capacity and potential of the PS19a

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<sup>1</sup> <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review>

Land North West of Stonehouse (within Standish Parish) site in meeting the emerging development requirements of the Stroud Local Plan Review.

- 1.9 An outline planning application for up to 635 dwellings, a primary school, associated works, infrastructure, open space, landscaping and access is in the process of being prepared for that part of the emerging Local Plan allocation within our client's control. The application will be submitted to the Council in due course.
- 1.10 Pre-application public consultation was undertaken between 12th February and 19th March 2021 and an online meeting was held with members of Standish Parish Council, its planning consultant, and the client team with regard to the outline planning application on 2nd March 2021.

## 2. THE VISION FOR STANDISH

2.1 The SNDP, once made, will provide additional non-strategic<sup>2</sup> planning policy to be taken into consideration during decision making within the Neighbourhood Area and will comprise part of the development plan for the Standish Neighbourhood Area.

### Plan period

2.2 The SNDP has a proposed plan period up to 2040 which dovetails with the plan period for the emerging Stroud Local Plan Review. It is clear that the SNDP is being prepared in the context of the policies of the emerging Local Plan and must therefore be cognisant of those emerging policies.

2.3 As a result the SNDP is positive with regard to the delivery of new development at our client's site which forms part of PS19a Land North West of Stonehouse (within Standish Parish).

2.4 National Planning Practice Guidance (NPPG)<sup>3</sup> allows for the preparation of a Neighbourhood Plan before or at the same time as a local planning authority is producing its local plan. However it should be noted that the SNDP;

**"... must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order 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."** (emphasis added)

2.5 Given the synergy between the SNDP and the emerging Stroud Local Plan Review it is assumed that the SNDP will not be submitted to the Council for Regulation 16 consultation and independent examination until the Stroud Local Plan Review has been subject to independent examination and adopted by the Council in due course. It is currently anticipated that the Stroud Local Plan Review will be submitted to the Planning Inspectorate for Examination in September 2021.

2.6 Currently there is no adopted development plan policy that allocates PS19a Land North West of Stonehouse (within Standish Parish) therefore there is no adopted policy basis for the SNDP Strategic Development policy. Similarly, the proposed

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<sup>2</sup> NPPF paragraph 18

<sup>3</sup> NPPG Neighbourhood Plans Paragraph: 009 Reference ID: 41-009-20190509 Revision date: 09 05 2019

Housing Allocation in the SNDP at Stagholt Farm would also be contrary to the policies of the adopted development plan for the purposes of 'general conformity' and consideration of 'basic conditions'<sup>4</sup>.

- 2.7 However, the emerging Stroud Local Plan Review predominantly carries forward the spatial strategy of the adopted Local Plan in terms of the location of new development for the plan period up to 2040. SP19a is an extension to an existing adopted strategic allocation at the Tier 2 Settlement of Stonehouse (but within Standish Parish). To that extent the emerging Stroud Local Plan Review seeks to deliver new housing and employment development with a spatial geography that has already been approved in the adopted Local Plan.

#### SNDP Vision

- 2.8 Box 2: 'Vision for Standish in 2040' states that in 2040 Standish will be a place where;

**"New housing is carbon neutral with higher standards than other development"**

- 2.9 While matters have progressed with regard to the Government consultation on the Future Homes Standards since the last Regulation 14 Standish Neighbourhood Plan consultation, it remains the case that the adopted Stroud Local Plan (2015) does not contain locally evidenced adopted technical standards for housing design prepared in accordance with the national planning practice guidance<sup>5</sup>. Adopted Core Policy CP8 'New Housing Development' Criteria 4 requires new housing development to;

**"Use sustainable construction techniques and provide renewable or low carbon energy sources in association with the proposed development"**

- 2.10 Adopted Policy ES1 'Sustainable Design and Construction' supports making sustainable construction and design integral to new developments and seeks to assist with the transition to a low carbon economy. The policy is designed to highlight the sustainable construction methods that can be considered through the planning process, but does not seek to prescribe a set standard or requirement and is not intended to duplicate the elements of sustainable construction incorporated into the building regulations.

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<sup>4</sup> NPPG Neighbourhood Plans Paragraph: 065 Reference ID: 41-065-20140306 Revision date: 06 03 2014

<sup>5</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards>

- 2.11 Moreover, Stroud have a Sustainable Construction Supplementary Planning Document (SPD) which was adopted by the Council on 16th February 2017. The purpose of the SPD is to advise and inform developers on a range of sustainability issues potentially relevant to their development.
- 2.12 It is quite clear that the policies of the adopted Local Plan do not go beyond the Building Regulations, therefore while it is appreciated that the SNDP vision is aspirational, the vision statement requiring new housing development to be carbon neutral '*with higher standards than other development*' is not in general conformity with the adopted local plan, nor does it comply with national planning practice guidance which requires optional standards to be established through the Local Plan process not through Neighbourhood Plans.
- 2.13 Emerging Core Policy DCP1 of the Stroud Local Plan Review<sup>6</sup> seeks to achieve carbon neutral development within the authority by 2030, however this policy is not yet adopted, and is yet to be considered through a Local Plan examination in accordance with national planning practice guidance.
- 2.14 Meanwhile it may be more appropriate for the SNDP to reference the National Design Guide (Jan 2021)<sup>7</sup> with regard to these matters.
- 2.15 Future changes to the Building Regulations, which will apply nationally, will introduce the Government's proposed Future Homes Standard.
- 2.16 Pegasus raise concern with regard to bullet point 7 in the vision statement that;
- "In any new large housing scheme, there is a new village centre that serves the whole community"**
- 2.17 This concern is further highlighted by the statement in Box 3 under Strategic Development that;
- "There will be a new village centre that will serve the whole community"**
- 2.18 The text of the SNDP does not state where a new village or local centre should be delivered and yet it is included within the vision for the Neighbourhood Plan.
- 2.19 Particular concern is raised if the SNDP considers that a new village centre should be delivered at SP19a - Land North West of Stonehouse (within Standish Parish),

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<sup>6</sup> [https://www.stroud.gov.uk/media/1485600/part-2\\_pre-submission-draft-plan-2021\\_final-25-05-21.pdf](https://www.stroud.gov.uk/media/1485600/part-2_pre-submission-draft-plan-2021_final-25-05-21.pdf)

<sup>7</sup> <https://www.gov.uk/government/publications/national-design-guide>

given the facilities being provided in the mixed use local centre as a part of the ongoing Great Oldbury development, which would be within easy walking distance of the PS19a allocation.

- 2.20 Representations for site SP19a - Land North West of Stonehouse (within Standish Parish) submitted to the Stroud Regulation 19 consultation included a Position Statement, attached at Appendix 1, with an Illustrative Masterplan at Section 2 which demonstrates how land under our client's control could come forward and deliver additional facilities. The Illustrative Masterplan shows areas of housing, a new primary school, playing pitches, public open space, drainage infrastructure and green infrastructure, but does not include a new village centre, given the close proximity of the planned Great Oldbury local centre.

**APPENDIX 1 – LAND NORTH WEST OF STONEHOUSE  
(WITHIN STANDISH PARISH) - POSITION STATEMENT**



### 3. STANDISH DEVELOPMENT FRAMEWORK

3.1 Pegasus support the Standish Parish Character Areas and Development Framework in as far as Area G reflects the area in the emerging Stroud Local Plan Review for Strategic Allocation PS19a Land North West of Stonehouse (within Standish Parish).

3.2 Pegasus raise objection to the statement at paragraph 55 that;

**"Taken together, the current SA2 allocation and the PS19a allocation will cause a dramatic and harmful landscape impact upon the parish"**

3.3 The Illman Young Standish Landscape Assessment (July 2019) has been published for consultation as part of the evidence base of the revised Regulation 14 SNDP. This report was prepared in the context of the very early stages of delivery of the adopted allocation of SA2 Greater Oldbury. Therefore, consideration of SP19a, as a north western extension of SA2 was undertaken in the context of existing open countryside to the south, however this 'open countryside' comprises the adopted allocation of SA2 for which there is an approved outline planning application including a masterplan (S.14/0810/OUT) and numerous reserved matters and discharge of conditions applications.

3.4 The SA2 allocation is adopted and falls predominantly within Stonehouse Parish. The emerging PS19a allocation has been selected by Stroud Council taking into account the considerable evidence base being prepared to support the examination of the Local Plan and is an extension of the SA2 strategic allocation.

3.5 The supporting text for emerging Core Policy DCP1 of the Stroud Local Plan Review states at paragraphs 2.9.9 and 2.9.10 that;

**"2.9.9 The strategy for delivering the required (*quanta of development*) is to concentrate most development at a series of strategic locations, where housing, jobs and necessary infrastructure can be coordinated and delivered in a timely manner.**

**2.9.10 The strategic sites are located at the principal settlements within the District, at new settlements and within the key employment property market areas: south of Gloucester, Rail/M5/A38 Corridor, Stroud Valleys and Berkeley/Sharpness." (emphasis added)**

3.6 The proposed location of strategic development within Standish Parish therefore has to be understood in the context of the emerging Local Plan Review which is required to meet the development needs of the District up to 2040 in sustainable

locations in accordance with national planning policy guidance and the National Planning Policy Framework (2021).

3.7 The Stroud Local Plan Review has been subject to both Regulation 18 and Regulation 19 public consultation and is based on an extensive evidence addressing matters which include landscape, flood risk, heritage, housing and employment land delivery, infrastructure and viability to ensure that new planned development comes forward in accordance with a sustainable spatial strategy for the District.

3.8 The Stroud Local Plan Review landscape evidence report by White Consultants – 'Evaluation of Site Landscape and Visual Issues Report' for Stroud District Council (October 2019) identified the PS19a site as a potential candidate site, it recognised the area forms an extension of Stonehouse northwards. However, the report concluded that this;

**"could be softened and integrated by appropriate planting as well as a sensitive approach to development pattern. The SAC mitigation measures should also be defined and implemented."**

3.9 A Landscape and Visual Appraisal has been prepared for our client's site by MHP Design Ltd Chartered Landscape Architects on behalf of the applicants and is attached at Appendix 2. The report concludes that:

**"The development of parcel PS19a would appear as a seamless part of the well treed settlement of the allocated SA2 land with a new interface with the open countryside formed by the new buffer of green infrastructure located along the northern boundary of the land parcel. This approach protects the settled rural landscape character already experienced from the AONB and replicates the successful mitigation woven into the masterplan for the allocated land south of the land parcel."**

#### **APPENDIX 2 – MHP LANDSCAPE REPORT**

3.10 Paragraphs 4.29 - 4.31 of the Position Statement at Appendix 1 refer to the landscape and visual context of our client's site. Paragraph 4.29 states that;

**" The magnitude of change likely to be experienced in views out from the AONB due to the panoramic nature of the views is assessed to be negligible."** (emphasis added)

3.11 Paragraph 4.30 states;

**"In terms of landscape character the development would result in a loss of rural openness to site from**

**development but new built form would be seen in the immediate context of Great Oldbury. This has been identified to limit harm to the wider rural landscape character from the loss of openness." (emphasis added)**

3.12 Paragraph 4.31 concludes that;

**"Overall, the development of the Site is assessed to not give rise to unacceptable landscape and visual effects and to protect the setting of the Cotswolds AONB."(emphasis added)**

3.13 Criteria F. of Policy S1 Standish Development Framework states that;

**"Development will respect the character identified in the Standish Landscape Assessment and will seek to avoid harm to the tranquillity of the countryside, generate a biodiversity net gain, and avoid flooding by use of effective water management regimes using SuDS (including rainwater harvesting, Natural Flood Management and retention of natural areas adjacent to watercourses) and the retention of natural areas adjacent to water courses."**

3.14 Landscape character, biodiversity net gain, the delivery of strategic green infrastructure, surface water flood risk management and easements to existing water courses for management purposes are all matters that would be dealt with as a matter of course by our client through the submission of a planning application for the site, with any mitigation required addressed through any accompanying Environmental Statement. These are also matters that are covered by strategic and non-strategic policies of the adopted Stroud Local Plan (2015). Therefore, Criteria F of Policy S1 of the SNDP adds nothing further to the adopted policies of the Stroud Local Plan.

#### 4. STRATEGIC DEVELOPMENT SITES

- 4.1 The Strategic Development Sites section of the SNDP includes a series of nine 'South Standish Development Principles' that relate to the whole of emerging allocation PS19a plus Policy S2: 'Major Development in South Standish'.
- 4.2 The relationship between 'South Standish Development Principles' and Policy S2: 'Major Development in South Standish' is unclear as many of the development principles are subsequently repeated in Policy S2.
- 4.3 As the text of Policy S2 will in time be used by decision makers these representations focus on the Policy.
- 4.4 It is noted that proposed policy in the SNDP should be drafted using the term 'should', not 'will', as planning policy is subject to interpretation by a decision maker. The use of 'will' in Policy S2 is highlighted in paragraph 4.5 below.
- 4.5 Policy S2 states;

**"Development of more than 10 houses (Major Development) or development at South Standish (formerly referred to as PS19a) will require a site masterplan. The masterplan will be produced in consultation with the Parish Council and community and will follow the South Standish Development Principles and should take account of the Standish Development Framework evidence. The site masterplan should be submitted as part of Outline or Full planning applications and should provide the following supporting evidence as a minimum, taking full regard of all relevant Development Plan policies:..."** (emphasis added)

- 4.6 Any pre-application engagement on a development site within Standish is required to take place in accordance with the Statement of Community Engagement of Stroud District Council and with regard to any updated national policy requirements of the National Planning Policy Framework (NPPF 2021).
- 4.7 There is no mandatory national planning policy requirement for master planning to be undertaken in consultation with a Parish Council. The NPPF (2021) at paragraph 40 encourages good practice whereby local authorities;

**"...where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications."**

4.8 The Parish Council cannot therefore make the preparation of a masterplan in consultation with themselves a policy requirement as this does not accord with national planning policy.

4.9 The Planning Practice Guidance (PPG)<sup>8</sup> advocates pre-application engagement as good practice in terms of a collaborative process between an applicant; the local planning authority; statutory and non-statutory consultees, elected members and local people. However, there is no mandatory requirement for an applicant to do so where they are not already required to do so by law.

4.10 The Stroud Statement of Community Involvement (Nov 2019)<sup>9</sup> (as amended 15.10.2020) states;

**"This document sets out Stroud District Council's strategy for community involvement in the planning process. It sets out the ways in which we will inform, engage and consult people when we are formulating planning policies and considering planning applications and how we will give feed back to the community on the results."**

4.11 Section 3 'Community Involvement in the planning application process' states at paragraph 3.5 that;

**"For larger-scale or potentially controversial development proposals, the Council expects developers to engage with relevant stakeholders, the local community, Ward Members and Town and Parish Councils. For large sites allocated in the adopted Local Plan, the Council has agreed a Pre-Application Community Involvement Protocol (available on the Council's website), which sets out good practice for developers, town and parish council's and the District Council. For very large development proposals, pre-application consultation is required by the Planning Act 2008 and the Localism Act 2011."**

4.12 The Stroud Pre-application Community Involvement Protocol<sup>10</sup> quotes former paragraph 128 of the NPPF (2019) made in the context of Section 12: 'Achieving well designed places'.

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<sup>8</sup> <https://www.gov.uk/guidance/before-submitting-an-application> (as amended 15.03.2019)

<sup>9</sup> <https://www.stroud.gov.uk/media/1287287/amended-statement-of-community-involvement-october-2020.pdf>

<sup>10</sup>

[https://www.stroud.gov.uk/media/1593/pre\\_application\\_community\\_involvement\\_protocol.pdf](https://www.stroud.gov.uk/media/1593/pre_application_community_involvement_protocol.pdf)

**“Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.”**

- 4.13 The Protocol can only be used where a Parish Council has formally resolved to adopt it and use it. The Protocol is accompanied by guidance notes. The Addendum for Standish Parish is dated January 9th 2014.
- 4.14 It is clear from the above that the SNDP cannot 'require' a site masterplan to be produced in consultation with the Parish Council and the community as a matter of planning policy as currently written in draft Policy S2. Community engagement is a matter of good practice and something my client is committed to, but it cannot be 'required'. The plan is justified in recognising the value of early community engagement, but equally there is no statutory basis for requiring it.
- 4.15 Any concept masterplan prepared for the site and provided to the local community for the purposes of consultation has to consider the planning constraints that exist at the site and then build on the opportunities that present as a starting point for overall layout, design and access.
- 4.16 While the views of the local community can be sought, matters relating to layout, design and access may already be predetermined as a result of existing planning constraints or adjacent development.
- 4.17 Moreover, there is no jurisdiction over the input of the local community in collaboration with a developer being found suitable by the local authority, or their associated internal or external consultees on submission of such a masterplan. It is for the local planning authority to determine a planning application by weighing the merits of the scheme in the planning balance when considered against the policies of the adopted development plan read as a whole.
- 4.18 SNDP Policy S2 lists a series of 11 supplementary documents to be submitted with any outline or full planning application at SP19a and makes a statement about the management of soil at the site. The list of documents required are as follows;
- Consultation Statement
  - Community Infrastructure Access Study

- Countryside And Wildlife Plan
- Transport Statement or Transport Assessment
- Sustainability Statement
- Energy Strategy
- Lighting Strategy
- Landscape Visual Impact Assessment
- Sewerage and Drainage Masterplan
- Landscape and Habitat Management Plan
- Recreational Impact Strategy

4.19 SNDP Policy S2 seeks the submission of information with any application over and above the requirements of the Stroud Validation checklist<sup>11</sup> for an outline planning application. National submission requirements are set out in Regulation 11 of the Town and Country Planning (Development Management Procedures) Order 2015.

4.20 It is not for the Neighbourhood Plan to add to the Local Validation Checklist or to introduce new requirements such as the need for additional supporting technical statements at an inappropriate stage of the development process.

4.21 Paragraph 44 of the NPPF (2021) states that;

**"Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions, and should be reviewed at least every two years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question."** (emphasis added)

4.22 Our client's proposed outline application at the site will be accompanied by an Environmental Statement (ES) under the Environmental Impact Assessment Regulations which will address and consider many of the matters raised by the SNDP in the proposed reports described in paragraph 4.18 above – it is therefore not necessary to duplicate the work of an ES with further bespoke reports.

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<sup>11</sup> <https://www.stroud.gov.uk/media/1070954/local-validation-checklist-out-some-matters-reserved-updated-19092019.pdf>

- 4.23 Moreover, the NPPF is clear that only material that is 'relevant, necessary and material' to an application should be requested to be submitted.
- 4.24 Given an initial outline application would likely have 'all matters reserved except access' a developer cannot be precisely certain with regard to matters such as sewerage, drainage and landscape until layout is determined, which would be the subject of a later reserved matters application. It is unreasonable therefore for the SNDP to request submission of these matters at the initial outline application stage.
- 4.25 The standards quoted at criteria K. in relation to management of soil at the site should also be omitted from the policy as any outline application would be subject to conditions that would consider this matter. The standards quoted may also be superseded in the SNDP plan period.
- 4.26 The evidence base supporting the Neighbourhood Plan is not subject to full public examination or cross examination at Hearing Sessions and therefore cannot be considered to be as robust as the evidence prepared by the local authority to support the Stroud Local Plan Review. The Neighbourhood Plan evidence base cannot therefore be used as a starting point for the preparation of technical documents to support a planning application e.g.: The Standish Neighbourhood Plan Landscape and Visual Appraisal.
- 4.27 Pegasus consider that the text of Policy S2 should be amended to reflect the representations made above. The comprehensive Stroud Local Validation Checklist should be relied upon by the SNDP in order to ensure that all the matters to be addressed in the supporting documents currently listed at Policy S2 are adequately considered through the planning application process at the relevant point in time.
- 4.28 Our client has submitted evidence to the Stroud Local Plan Review Regulation 19 public consultation that demonstrates that their proposed development on part of SP19a will have connectivity with the consented development at strategic allocation SA2 (Great Oldbury) and will provide new strategic green infrastructure including sustainable transport and wildlife corridors.
- 4.29 Our client proposes new housing, a new one form entry primary school, playing pitches and green infrastructure which will have vehicular access from Great Oldbury to the south. It is therefore unclear why Criteria B 'Community



Infrastructure Access Study' is a policy requirement of SP2, moreover this matter would be covered in the socio-economic chapter of any Environmental Statement.

- 4.30 New pedestrian and cycle links at our client's site will connect the development to the surrounding network of routes ensuring residents will have good access to key local facilities which will encourage sustainable travel. Objection is therefore raised to the requirement at Criteria D for a multi-user sustainable transport route to Stonehouse and towards Gloucester.
- 4.31 The Gloucestershire Local Transport Plan (2020-2041)<sup>12</sup> identifies 'Access improvements 'Active Travel Route' – B4008 between Little Haresfield (M5 J12) and Stonehouse corridor' as scheme 6 for Stroud under the Connecting Places Strategy (pp.179)<sup>13</sup>.
- 4.32 The Stroud Local Plan Review Regulation 19 Policy for SP19a does not include a policy requirement for the delivery of an active travel route through the proposed allocation, to this extent the SNDP is not in conformity with the emerging local plan. Our client has addressed matters of active travel, prioritising walking and cycling and access to public transport over the use of the private car in their emerging proposal. Linkages for sustainable transport to Great Oldbury required by the emerging site allocation Policy PS19a are provided given the footpath and cycle linkages proposed and a road of a suitable width for a bus route is also proposed.
- 4.33 The site PS19a is situated to the west of the railway corridor while the B4008 is situated to the east of the railway corridor.
- 4.34 With regard to the Lighting Strategy at Criteria G it will be necessary to ensure adequate lighting at the site for community and highway safety purposes and for this to be of a standard adequate to be adopted by the Highway Authority. Any SNDP should not be overly prescriptive with regard to these matters in order that community safety and security is ensured.
- 4.35 The SNDP should not replicate the policy requirements of the adopted local plan which already contains policies relating to sustainable development (i.e.; Policies CP5; CP8; ES1 and associated policies in the 'Our Environment and Surroundings

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<sup>12</sup> <https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2020-2041/transport-strategy-for-gloucestershire-to-2041/>

<sup>13</sup> <https://www.gloucestershire.gov.uk/media/2108466/ltp-policy-document-final-v132.pdf>

Chapter), these policies will be reviewed and updated to reflect changes to national planning policy guidance in the emerging Stroud Local Plan Review. The SNDP does not provide evidence as to why developers at PS19a should achieve higher sustainability requirements in terms of the built form of development than the requirements of the adopted Local Plan.

- 4.36 Stroud have a Sustainable Construction Supplementary Planning Document (SPD) which was adopted by the Council on 16th February 2017. The purpose of the SPD is to advise and inform developers on a range of sustainability issues potentially relevant to their development.
- 4.37 Objection is raised to those Criteria of Policy S2 that go beyond the requirements of the adopted local plan or the locally adopted SPD requirements of the Council.

## 5. SUSTAINABLE TRANSPORT

5.1 Pegasus make the following representations with regard to Policy S3: Sustainable Transport and its associated Sustainable Transport Evidence Paper (July 2021).

5.2 Paragraph 89 of the SNDP states that a total of 10 footpaths and bridleways either cross the wider PS19a site or form part of its border.

5.3 Pegasus consider that the text of this chapter and the background evidence paper as written suggests that the development of any part of PS19a, including our client's site, will have a negative impact on existing Public Rights of Way (PROW) e.g. paragraph 90 of the SNDP states;

**"Any development at South Standish would therefore have the potential to cause harm to these footpaths and bridleways which is contrary to Local Plan policy EI13. Therefore, as a minimum, these footpaths should be preserved according to that policy."**

5.4 Page 5 of the Sustainable Transport Evidence Paper (July 2021) states in large bold letters;

**"Potential harm that could arise to the PROW network by introducing a strategic development"**

5.5 New development is not harmful to PROW, indeed it can result in improvements including enhanced provision and connectivity for those using footpaths and bridleways resulting in benefits for existing and new residents alike.

5.6 Pegasus request that the text of the SNDP and its associated background paper with regard to sustainable transport be amended to reflect the benefits that can result from new development for PROW's.

5.7 While the SNDP has an aspiration to deliver a 'Multi-User Track', as identified in the Gloucestershire Local Transport Plan, no final route has been agreed.

5.8 Pegasus note the evidence provided in the Sustainable Transport background paper (July 2021) but draw attention to the fact that the identified final route of the 'Access improvement Multi-User Track - B4008 between Little Haresfield and Stonehouse' referred to in the evidence paper is not published as part of the consultation documentation.

5.9 Pegasus request that any approved route that has been agreed with all landowner parties be published if it has been so agreed and identified.

5.10 Policy S3: Sustainable Transport requires strategic development to provide multi-user sustainable transport routes to meet the needs of pedestrians; cyclists and horse riders. Pegasus object to this requirement. In practice these modes of transport are not compatible, they also have different requirements. It would be safer for the community for any new development to enhance existing PROW at the site to meet the specific needs of user groups.

5.11 Policy S3 also requires the following developer contributions;

**"Developer contributions will be supported towards a multi-user path from Horsemarling roundabout to Black Bridge, and a strategic cycleway from the Horsemarling roundabout towards Gloucester will be required. The proposals will provide the multi-user track/strategic cycleway shown in red on Figure 11, Option 2 connecting Horsemarling Roundabout to Crowcomepill and to Standish Lane (Standish Bridleway 16 and Bridleway 22); or the strategic cycleway also shown in Figure 11 from Horsemarling Roundabout to Haresfield Lane as shown in option 1; or a combination of the two as explained in option 3. Safe crossings should be provided across the B4008."**

5.12 Pegasus object to this policy requirement as any financial contribution sought from the development of the site to PROW in Standish as part of a S.106 agreement would need to be 'fairly and reasonably related' to development proposals in order to comply with paragraph 57 of the NPPF (2021) and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. Paragraph 57 of the NPPF (2021) is cited below;

**"57. Planning obligations must only be sought where they meet all of the following tests:**

**a) necessary to make the development acceptable in planning terms**

**b) directly related to the development; and**

**c) fairly and reasonably related in scale and kind to the development"**

5.13 Policy S3 should not assume that the delivery of development at PS19a will fund all the PROW enhancements sought by the SNDP and the Parish should look to other funding sources, such as contributions from CIL on the making of the SNDP, to help facilitate these local infrastructure improvements in the Parish.

5.14 Any alterations to PROW within our client's site as a result of new development would be addressed through a planning application and therefore would, in any event, be considered against the provisions of Policy CP14 criteria 13 of the

adopted Stroud Local Plan (2015) (or any replacement policy in the emerging local plan) which states that;

**"High quality development, which protects, conserves and enhances the built and natural environment, will be supported. Development will be supported where it achieves the following:**

**13. Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport...**

## **6. SITE ALLOCATION AT STAGHOLT FARM**

- 6.1 Pegasus have no comment to make on Policy S4 other than the site is situated to the south-east of the site our client is promoting such that synergy over matters such as green infrastructure, wildlife corridors and public rights of way connectivity should be ensured with our client's site through the text of any SNDP Policy.
- 6.2 Currently the text of Policy S6 considers the site in isolation and makes no mention of contributions to multi-user linkages or PROW improvements which are currently requirements made of other major development by SNDP policy.

## 7. CONCLUSIONS

7.1 In conclusion and to summarise the representations made above with regard to our client's land interests the following are proposed as amendments to the revised Regulation 14 SNDP;

- Ensure that policy in the SNDP does not replicate existing adopted policy of the Stroud Local Plan or proposed emerging policy of the Stroud Local Plan Review
- Ensure SNDP policy does not make requirements of developers over and above the Stroud Local Validation Checklist
- Amend text of Policy S2 in light of Pegasus representations
- Amend text of Policy S3 in light of Pegasus representations
- Amend text of Policy S4 in light of Pegasus representations

7.2 Our client welcomes the opportunity to comment on the emerging NDP and looks forward to ongoing and constructive engagement with the Parish Council in bringing forward a part of draft allocation PS19a – Stonehouse North West included in the emerging Stroud Local Plan Review Pre-Submission Draft Plan Regulation 19 Consultation (May 2021).

## **APPENDIX 1**

### **LAND NORTH WEST OF STONEHOUSE (WITHIN STANDISH PARISH) - POSITION STATEMENT**















# 01 INTRODUCTION

- 1.1 This statement outlines details of the proposed urban extension to Stonehouse. It presents a summary of the baseline survey work undertaken, the emerging masterplan including land uses and sets out an expected delivery programme.
- 1.2 The objective of the scheme is to deliver housing in accordance with the allocation, including a primary school, associated works, infrastructure, open space and landscaping.
- 1.3 The Site forms part of a proposed allocation in the Stroud District Local Plan Review (Pre-Submission Draft Plan, Regulation consultation, May 2021), under Policy PS19a. Policy PS19a allocates the Site (and additional land to the east of the Site, as a strategic mixed-use development, to include up to 5ha of employment, 700 dwellings, a primary school, landscaping and green infrastructure.

# 02 EMERGING MASTERPLAN

- 2.1 The emerging illustrative masterplan which has been informed by ongoing baseline survey and assessment work shows how the number of dwellings, primary school, open space, including sports pitches, community orchard, greenspace, parks and recreation, play space, natural green space and allotments can be accommodated; and two points of access provided from the south, via the Land West of Stonehouse Sustainable Urban Extension
- 2.2 The green infrastructure is intended to offer opportunities for leisure and informal recreation uses as well as areas managed for nature conservation purposes.

**KEY - ILLUSTRATIVE MASTERPLAN**

**SITE BOUNDARY**  
[25.06Ha]

**LAND USES**

- PROPOSED RESIDENTIAL
- PRIMARY BUILT FORM
- SECONDARY BUILT FORM
- 1FE PRIMARY SCHOOL
- OPEN SPACE AND GREEN INFRASTRUCTURE INCLUDING PARKS & RECREATION/AMENITY GREEN & COMMUNITY ORCHARD
- PITCHES & OUTDOOR SPORT
- POTENTIAL CHANGING FACILITY
- ALLOTMENTS (CIRCA 0.55HA)
- PROPOSED DRAINAGE INFRASTRUCTURE

**POTENTIAL CONSTRAINTS**

- EXISTING TREE GROUPS/HEDGEROWS (SUBJECT TO SURVEY)
- CONTOURS AT 0.5M INTERVALS

**MOVEMENT**

- POTENTIAL ACCESS
- ENHANCED STREET WITH POTENTIAL TO ACCOMMODATE A BUS ROUTE
- INFORMAL STREET
- PEDESTRIAN PRIORITISED STREET
- PRIVATE SHARED DRIVES
- EXISTING PROW
- PROPOSED FOOTPATH LINK/PROW DIVERSION
- EXISTING TRACK

**PLAY SPACES**

- NEIGHBOURHOOD EQUIPPED AREA OF PLAY (NEAP)
- LOCAL EQUIPPED AREA OF PLAY (LEAP)







# 03 DELIVERY

- 3.1 It is anticipated that the Site could deliver around 100 dwellings per annum.
- 3.2 The Local Plan is expected to be submitted to the Planning Inspectorate in September 2021 for examination. An appointed Inspector will then examine the Draft Local Plan to determine whether it is a sound plan and can be adopted by the Council, or whether modifications need to be made. The examination process is likely to involve a number of public hearing sessions during 2022.
- 3.3 It is assumed that outline planning permission will be granted in summer 2023, with the first reserve matters submitted in summer 2024. House building would commence in spring 2025 with the first completions by March 2026.
- 3.4 The Site is within the control of highly experienced employment and residential developer/promoters with a proven track record of delivering strategic sites in Stroud and indeed across Gloucestershire who have brought forward a number of mixed-use developments in the County (including the West of Stonehouse {Great Oldbury} Strategic Allocation under the adopted Stroud Local Plan).

Planning Permission granted Summer 2023

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1st Reserve Matters submitted Summer 2024

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Commence Housebuilding Spring 2025

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Development completed  
(assuming 2 outlets at 50 dwellings per annum each) Spring 2032

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# 04 SUMMARY OF BASELINE INFORMATION

## INTRODUCTION

- 4.1 The following section summarises the environmental baseline studies which have been undertaken in order to inform the emerging master plan for the proposed development and the preparation of a planning application.
- 4.2 The topography of the Site rises gradually towards the north east and then forms a plateau. Field boundaries are comprised of hedgerows and trees as well as the unsurfaced access track to the east which provides vehicular access to Stagholt Farm and fields. A number of Public Rights of Way (footpaths) cross components of the Site. The Site, and land extending to the east of the Site up to the railway line are proposed for development in the emerging Stroud District Council (SDC) Local Plan Review as Stonehouse North West Policy PS19a.
- 4.3 The Site is not in, or adjacent to, an environmentally sensitive area.
- 4.4 The nearest statutory designation is the Cotswolds Area of Outstanding Natural Beauty (AONB) which runs along the B4008 approximately 0.5km to the east of the Site with a railway and its associated cutting and fields intervening.
- 4.5 The Site lies within the Severn and Avon Vales National Character Area (NCA 106). At the county level the Site is within the Settled Unwooded Vale landscape character type, located within the Vale of Berkeley landscape character area (SV6A). At the District Level the Site lies within the Rolling Agricultural Plain Landscape Character Type and sub type LCT5a 'Escarpment Foothslopes' (Stroud District Landscape Character Assessment, 2000).
- 4.6 The Site lies predominantly within Flood Zone 1 (low probability of fluvial flooding) which means that the Site comprises land which has been assessed as having a less than 1 in 1,000 annual possibility of flooding.

## TRANSPORT AND ACCESS

- 4.7 Access to the Site would be via the West of Stonehouse allocation in the adopted Local Plan (Policy SA2 and planning ref. s.14/0810/OUT). Access to the West of Stonehouse allocation is gained via Grove Lane, near to the A419 Chipmans Platt roundabout to the southwest of the Site and via the B4008 and Oldends Lane which crosses over the railway line to the east of the Site.
- 4.8 The Site lies within immediate walking and cycling distance of both existing and planned employment and is well placed to utilise the bus services coming forward at Great Oldbury which will ensure at least a 30-minute frequency to Stonehouse, Stroud and Gloucester and 60-minute frequency to Cam and Dursley.
- 4.9 The Site is well positioned to benefit from the recent capacity improvements on the A419 Corridor. The A419 is a 'Main Movement Corridor' as defined in the 'Stroud Sustainable Transport Strategy' (November 2019), where it is envisaged that an integrated package of initiatives can be delivered with a focus on sustainable travel modes.
- 4.10 New pedestrian and cycle links will connect the development to the surrounding network of routes ensuring residents will have good access to key local facilities which will encourage sustainable travel.
- 4.11 A Transport Assessment scoping report setting out the assessment parameters has been produced and submitted to Gloucestershire County Council (GCC) in its capacity as the local highway authority, and Highways England which is responsible for the strategic road network.
- 4.12 The traffic impacts of the proposed development will utilise outputs from the Stroud Local Plan Traffic Modelling (March 2021) which includes 2040 future year forecasts including the allocation on land north west of Stonehouse. A request to GCC and SBC has been made for obtaining the modelling following the 'Stroud Modelling Forecasts Third Party Access Protocol'. Traffic flows output from the model forecasting will be input into individual junction capacity assessments to model in detail the operation of the surrounding local highway network in the weekday AM and PM peak hours.
- 4.13 The Site is not subject to any nature conservation designations. It does lie within the Impact Risk Zone for the Severn Estuary Special Protection Area (SPA) / Special Area of Conservation (SAC) / Ramsar and the Upper Severn Estuary Site of Special Scientific Interest (SSSI) located just over 5km west of the Site and, if necessary, financial contributions towards on-site mitigation measures within the Severn Estuary SAC / SPA / Ramsar (as set out within Stroud District Council's 'Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site' (December 2017)).
- 4.14 A suite of surveys has been undertaken at the Site including a Phase 1 habitat survey, Badger survey, Great Crested Newt survey (GCN) of off-site ponds (where access was granted), breeding and wintering bird surveys, Water Vole/Otter surveys, reptile surveys, Dormouse surveys and bat activity & automated surveys.

## ECOLOGY

- 4.15 The Site is dominated by agricultural fields of negligible ecological value with the features of greater ecological value (the hedgerows, stream and trees) being situated at the Site margins. These features would be retained and safeguarded wherever possible with any losses offset through compensatory planting based around native species of greater number/length/extent.
- 4.16 No evidence of Great Crested Newts, Dormouse or Otter/Water Vole was identified during the surveys. Whilst no reptiles were recorded during the specific surveys, an incidental sighting of a Slow-worm was recorded at the Site margins and habitats for this faunal group could be enhanced through creation of a greater extent of suitable habitat in open spaces post development. The wintering and breeding bird surveys have not identified any assemblages or species of particular ornithological note within the Site. Provision of suitable habitats for nesting and foraging birds will be provided post-development and enhancements accrued by provision of nesting boxes and appropriate new planting. As expected, bats have been identified using boundary features for foraging and navigation with some boundary trees recorded as having potential to support roosting bats. If any of the trees with bat roosting potential are due to be lost to the proposals further survey would be conducted to determine whether any bats are present and appropriate compensatory mitigation provided. The boundary features would be incorporated into open space/Green Infrastructure and foraging and navigation opportunities maintained and enhanced through creation of new habitats such as ponds/SUDs

features and wildflower grassland together with new tree/hedgerow planting based around native species. Further enhancements for roosting bats could be achieved through the provision of roosting boxes within the scheme, e.g. retained trees. Badger setts have been recorded at the Site margins and this species likely uses the fields and hedgerow for foraging. These setts would be retained and safeguarded or works that result in any direct impacts/disturbance conducted under licence from Natural England, as necessary.

## GROUND CONDITIONS

- 4.17 A non-targeted intrusive investigation has been undertaken and identified a consistent natural ground profile beneath the site concordant with recorded geological mapping. The Site is considered geotechnically suitable for the proposed development.
- 4.18 Localised contamination of the herbicide Pendimethalin was recorded within surface topsoil, however its natural biodegradation means that no remedial action is considered necessary and does not preclude topsoil from being used in the proposed development. There is no perceived risk to controlled waters.

## NOISE

- 4.19 A baseline assessment of the existing noise levels across the Proposed Development area has been undertaken and no issues have been raised at this stage. Minimal mitigation will be required for the Site.

## ARCHAEOLOGY AND HERITAGE

- 4.20 An archaeological desk-based assessment has been undertaken for the Site, along with a geophysical survey and a trial trench evaluation. These investigations confirmed the presence of an Iron Age enclosure and round-house in the northern part of the Site. A large but shallow Medieval pit was recorded in the central part of the Site, the function of which is uncertain. All the archaeological features had been truncated by historic and repeated agricultural activity and are not considered to be of any more than local significance.
- 4.21 A built heritage assessment was also undertaken for the Site. Three built heritage receptors were identified in particular ranging from high to low sensitivity. However, it is considered that the proposed development will result in no significant effects to these assets.

## AGRICULTURAL CIRCUMSTANCES

- 4.22 An assessment of the effects of the non-agricultural development on the soils and other agricultural factors of the Site has been undertaken. The Site extends to approximately 25ha and is agricultural land in arable and grassland use.
- 4.23 National and Local Plan policies seek to protect the “best and most versatile” agricultural land from irreversible development; the best and most versatile agricultural land is defined as land in Grades 1, 2 and subgrade 3a. The land at Stonehouse has been surveyed by Reading Agricultural Consultants and is all classified in subgrade 3b.
- 4.24 The land is managed by two separate holdings with grassland and arable crops being grown. For one of the holdings affected the area of land required exceeds 20% of the overall holding and is a significant impact. monies raised from the sale of the land could be used to mitigate the loss of land, at the discretion of the owners.
- 4.25 Overall, there is no planning policy impediment (with regard to agriculture) to the proposed development.

## LANDSCAPE AND VISUAL CONTEXT

- 4.26 A landscape and visual impact assessment of the Site has been undertaken. The Site is not within any landscape designation and is therefore considered to be of low landscape value in a district context. The Site has limited features of value other than its surrounding hedgerow boundaries.
- 4.27 The Site is well contained by field hedges with hedge trees and no hedgerow would be lost other than to form the proposed access. The development would provide an opportunity to incorporate new green infrastructure that would extend the existing network of green corridors and open spaces.
- 4.28 A number of public rights of way cross the Site linking with a broader local network of footpaths. These are retained and their connectivity with the wider landscape conserved. These footpaths provide robust connectivity with the immediately adjoining Great Oldbury residential development area. Although walkers of these footpaths will experience some loss of rural character to their immediate context, long distance views of the ascending escarpment will generally be retained.
- 4.29 Views out from the elevated escarpment within the AONB are panoramic with the Site being seen as a small area within a wide and panoramic view that extends west of the River Severn. The site is seen in the immediate context of the Great Oldbury settlement and wider Stonehouse settlement area. The magnitude of change likely to be experienced in views out from the AONB due to the panoramic nature of the views is assessed to be negligible.
- 4.30 In terms of landscape character the development would result in a loss of rural openness to site from development but new built form would be seen in the immediate context of Great Oldbury. This has been identified to limit harm to the wider rural landscape character from the loss of openness. Mitigation in the form of new green infrastructure has been identified to be effective in reducing landscape and visual effects as it will be seen to naturally extend and emulate the existing local green infrastructure which can be seen to successfully mitigate the effects of the Great Oldbury development.
- 4.31 Overall, the development of the Site is assessed to not give rise to unacceptable landscape and visual effects and to protect the setting of the Cotswolds AONB.

## HYDROLOGY, DRAINAGE AND FLOOD RISK

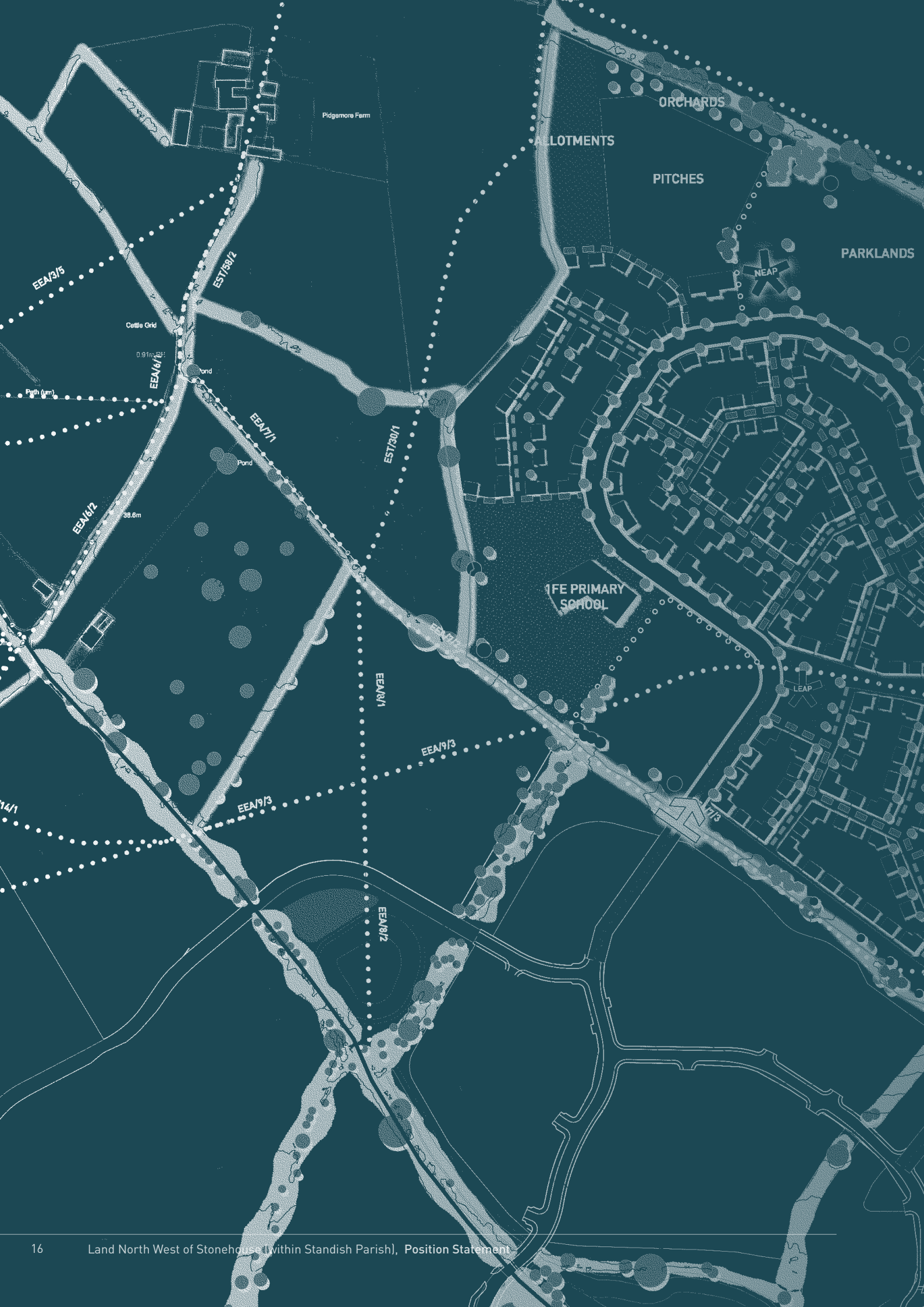
- 4.32 A surface water drainage strategy has been developed that incorporates a Sustainable Drainage System (SuDS. The proposed SuDS will ensure that flood risk resulting from pluvial events (rainfall) will be managed on-site and that flood risk will not be increased elsewhere as a result of the development. The restricted surface water flows from attenuation ponds will discharge to the adjacent watercourse (existing land drainage ditch / Colliers Brook) replicating the existing drainage patterns for the site.
- 4.33 A 40% allowance in accordance with Environment Agency guidance for climate change has been included in the SuDS design to take in to account the predicted increase in rainfall intensity over the lifetime of the development.
- 4.34 The Environment Agency flood maps for planning reproduced identifies the site to be predominantly located within Flood Zone 1 (low probability of flooding having a less than 1 in 1,000 annual probability of fluvial or tidal flooding). An area located in the southeast corner of the site adjacent to Colliers Brook (ordinary watercourse) falls within Flood Zone 2 /3. This area will not be developed and will form part of the public open space. All habitable built development will be located within Flood Zone 1 in accordance with the NPPF sequential approach.
- 4.35 A Water Framework Directive Assessment has been carried out to demonstrate that the proposed development, with mitigation, will not result in an deterioration of the status of the existing watercourses and that it will not compromise the WFD objective of achieving 'Good' status for the River Frome by 2027.
- 4.36 A site specific FRA has been produced in accordance with the requirements of the NPPF, Planning Practice Guidance, and EA advice notes, and demonstrates that the proposed development will be safe from flood risk and that it will not increase flood risk elsewhere.

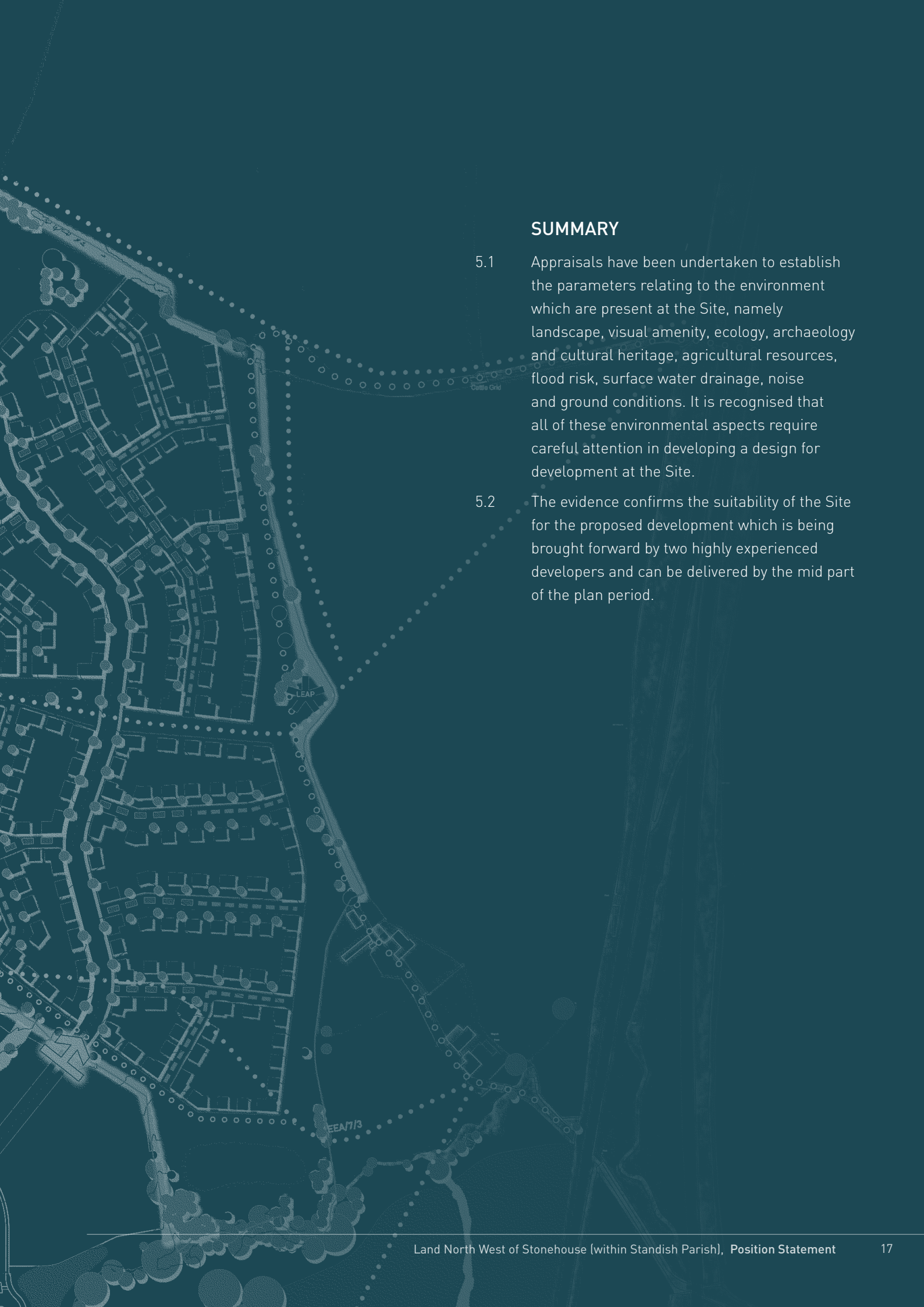


## AIR QUALITY

- 4.37 Stroud District Council no longer has any designated Air Quality Management Areas. Monitoring data from long-term sites operated by the Council confirm that air quality across the District was good in 2019 (data for 2019 were unaffected by changes to traffic flows brought about by Covid-19 restrictions), and the air quality objectives were met at all locations. Air quality for future residents of the proposed development is therefore expected to be acceptable.
- 4.38 During construction, a range of measures will be put in place to ensure that dust and emissions from construction activities are minimised. With these measures in place, the effects on existing properties in the area surrounding the proposed development, and the effects on new properties occupied prior to completion of construction of the wider site, will not be significant.
- 4.39 The air quality effects of additional traffic emissions generated by the proposed development once operational are unlikely to be significant. This judgement takes account of expected continued future improvements in air quality (as low and zero emission vehicles enter the national fleet), the build out rate of the proposed development (approximately 100 per year, with the first property being occupied no sooner than 2026), and the initiatives proposed to ensure that the development encourages sustainable travel modes (minimising emissions from private car use).







## SUMMARY

- 5.1 Appraisals have been undertaken to establish the parameters relating to the environment which are present at the Site, namely landscape, visual amenity, ecology, archaeology and cultural heritage, agricultural resources, flood risk, surface water drainage, noise and ground conditions. It is recognised that all of these environmental aspects require careful attention in developing a design for development at the Site.
- 5.2 The evidence confirms the suitability of the Site for the proposed development which is being brought forward by two highly experienced developers and can be delivered by the mid part of the plan period.

DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

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RIBA Royal Institute of British Architects URBAN DESIGN GROUP RECOGNISED PRACTITIONER



**APPENDIX 2**  
**MHP LANDSCAPE REPORT**

Landscape and Visual Appraisal of Land Parcel PS19a Stonehouse	
<b>Introduction</b>	
<p>MHP Design Ltd Chartered Landscape Architects were instructed by Robert Hitchins Ltd to undertake a landscape and visual appraisal of land parcel PS19a Stonehouse as identified in the Stroud District Council Emerging Strategy 2018. The appraisal gives particular focus to understanding landscape and visual sensitivity of the land parcel to development and the potential effects that might arise to the setting and character of the Cotswolds AONB designated landscape to the east of the land parcel.</p> <p>A site survey was undertaken by two chartered landscape architects during July 2019 when vegetation was in full leaf and during fine weather permitting clear views.</p>	
<b>Site location:</b>	
<p>The study site [the site] is located to the immediate north of the allocated land SA2 West of Stonehouse (Great Oldbury development). The land borders open countryside to the west adjoining Pidgemore Farm and to the north south of Standish Court. The eastern boundary is formed by the main line railway cutting. Stagholt Farm located to the immediate west of the railway and its access track form part of the land parcel.</p> <p>Please refer to <b>Figure 1</b> for site location, designations and viewpoint Photograph locations                      Please refer to <b>Figure 2</b> for local topography                      Please refer to <b>Figure 3</b> to <b>Figure 8</b> viewpoint photographs</p>	
<b>Land parcel description:</b>	
<p>The land parcel consist of two open agricultural fields separated by the access track to Stagholt Farm. Both fields were each formerly divided into a further two fields, the boundaries of which are identified on Ordnance Survey maps of the land. Presently the single field lying east of the farm track is in arable crop production and the larger field to the west of the track part in arable and part laid to pasture.</p>	
<b>Designations and implied value</b>	
Greenbelt	No
Area of Outstanding Natural Beauty	No but the western boundary of the Cotswold AONB runs along the B4008 some 0.2 miles from the edge of the site with a railway and its associated cutting and a field intervening.
Listed buildings	No. Locally in Nupend
Registered Park and Garden	No
Conservation Area	No
Open access land/public rights of way	Yes. A number of public rights of way cross the land parcel. These are illustrated in Figure 1
Valued landscape	No

<b>Discussion</b>	
<p>The land parcel is not covered by landscape or conservation designation and is not assessed to form part of a valued landscape based on physical attributes and previous studies. A public right of way crosses north west across the land parcel. This PRoW forms a direct link between the allocated land (SA2) to the immediate south, with a bridge (Black Bridge) which provides access over the railway to the land north of Stonehouse. This bridge provides a strategic link between Stonehouse and the land west of the railway. A further PRoW extends along part of the southern boundary of the land parcel. Refer to Figure 1 for exact location of public rights of way and bridle ways.</p> <p>The setting of the AONB and views in and out of the land are key considerations as is the setting of existing public rights of way and views therefrom.</p>	
<b>Landscape Character</b>	
National Character Area:	NCA 106: Severn & Avon Vales
County Character Area (Gloucestershire Landscape Character Assessment):	Settled Unwooded Vale: Vale of Gloucester
Stroud Landscape Assessment:	<p>Rolling Agricultural Plain Key characteristics of the landscape character type are:</p> <ul style="list-style-type: none"> <li>• Varied landscape of open, flat plain to more undulating landform towards limestone escarpment.</li> <li>• Established, old, rich rural lowland, with some woodlands and mature hedgerow trees and occasional orchards.</li> <li>• Land is dissected by the River Cam and Frome to the east.</li> <li>• Traversed from north to south by M5 motorway, railway, Gloucester Sharpness canal and the A38.</li> <li>• Semi enclosed landscape with some distant views, and more restrained views from Frome valley.</li> <li>• Churches act as a strong foci and landmarks.</li> <li>• Dispersed pattern of isolated villages.</li> <li>• Land use is a mix of arable and pasture.</li> <li>• Strong field pattern medium to small in scale.</li> </ul> <p>The Stroud Landscape Assessment confirms that the Rolling Agricultural Plain is a varied and extensive character type differentiated locally by variations in topography, land use pattern, vegetation cover and river systems. The assessment confirms that the land parcel falls within the sub division of the Escarpment Footslopes. The assessment confirms that the</p>

	<p>Escarpment Foothills landscape character sub division has the following distinctive characteristics:</p> <ul style="list-style-type: none"> <li>• Obviously undulating landscape and westward sloping topography when compared to the landscape to the west.</li> <li>• A transitional fringe between the Cotswold Escarpment and the Lowland Plain landscape character types.</li> <li>• Pasture is the dominant land use.</li> <li>• Elm hedgerows found around small streams and on lower slopes.</li> </ul>
<b>Discussion</b>	
<p>The landscape character of the site reflects the published characteristics of the Rolling Agricultural Plain and its sub area of the Escarpment Foothills. This is a settled rural landscape with features that reflect the settled elements of the landscape and rural elements of the undeveloped agricultural landscape. This mix of rural and settled features commonplace within the broader Settled Unwooded Vale landscape character area.</p> <p>The landscape character area forms a transition from the steeply sloping escarpment, characterised by steep pasture and woodland, to the undulating farmed vale with mix of arable, pasture and settlement. This transition is visible locally creating a good sense of place. The landscape to the south of the land parcel is also important to the sense of place and contributes to the setting of the land parcel. This is due to the well treed character which has a correlation with the lower lying land closer to the River Frome corridor.</p>	
<b>Site Features &amp; Details</b>	
<b>Natural Elements:</b>	
Landform	Gently ascending to the north east then forming a gentle plateau.
Vegetation	<p>Limited generally to field hedges. Hedges along the southern boundary and along the farm track are high quality dense hedges in good condition. Field boundaries along the western and northern boundaries are weaker in places.</p> <p>Hedgerow trees are present particularly along the southern and northern boundaries.</p>
Hydrology	No watercourses or ponds have been identified on the land parcel.
<b>Cultural Elements:</b>	
Land Use	Agricultural land use with mixed arable and pasture.
Boundaries and enclosure pattern	Part intact but decaying. Some field hedges or boundaries have been removed creating large fields for intensive agriculture.
Time Depth/historic landscape	Features are simple and rustic with mature trees boundaries adding some sense of time depth.



Relationship to built form/settlement	Limited but the land parcel is not remote from the existing settlement areas and will immediately adjoin the new settlement area when built out.
Amenity/recreation use	A number of public rights of way cross the site which allow views onto the Cotswold escarpment to the east and May Hill and the western side of the Severn to the west. The footpath links to Black Bridge are strategically important in that they allow crossing of the main railway line which is otherwise locally limited.
Perceptual qualities	Relatively open and elevated agricultural landscape, unremarkable in its own features but exposed to clear scenic views to the Cotswold escarpment.
<b>Condition</b>	
Hedges	Moderate with both good and weak hedges present. Weak areas are gappy or missing or with higher elm content. Good areas have strong stands of hawthorn, hazel and other desirable species.
Trees	Ash, oak in moderate condition generally
Pasture	Improved, intensive farmed
Arable	Moderate productive
Public Right of Way	Poor. Beyond the southern boundary of the land parcel, footpaths appear to have been blocked or are missing completely. Not frequently walked as a result.
Other	Stagholt farm and its structures were not identifiable due to screening hedges
<b>Discussion</b>	
The land parcel features are simple and relatively unremarkable but do reflect the local rural landscape characteristics. Condition of these features is mixed but assessed to be moderate in slight decline. High elm content in some hedges and limited green infrastructure management appear to be the pressures causing decline. Ash dieback is likely to increase the extent and speed of this decline over the next decade.	
<b>Landscape Sensitivity</b>	
The Stroud District Landscape Sensitivity Assessment (December 2016) has provided an extensive assessment of land sensitivity to development (both residential and employment) for the district. Land parcel PS19a is contained with assessment parcel St07 of the Landscape Sensitivity Assessment which identified the land parcel to have the following sensitivity to development:	
Sensitivity to Housing Use: Medium	
Sensitivity to Employment Use: Medium	
Supporting evidence provided by the Landscape Sensitivity Assessment states the following:	
<b>Sensitivity to Housing Use</b>	
<i>The sensitivity of the area lies in the rising slopes to the north east which contain the lower landscape including Stonehouse to the south, its contribution to the setting of the linear rural settlement of Nupend including listed buildings, the watercourse and associated riparian corridor, the openness of the land parcel and its</i>	

*intervisibility with the escarpment to the east. The value of the area lies in the many PROW's especially to the west and the listed buildings in Nupend. Housing would definitely extend the current settlement form and if implemented on the rising slopes to the north may become visible further north. Housing could be implemented on the lower areas to the east but should avoid adversely affecting the watercourse corridor and surrounding Nupend or affecting its setting and character. Consideration should be given to potentially implementing this with nearby sites to create a more coherent and integrated settlement form on the northern edge of Stonehouse.*

It is important to note that the Stroud District Landscape Sensitivity Assessment land parcel St07 extends over a large area than the land parcel PS19a. Land parcel PS19a does not extend to Nupend, its listed buildings or the watercourse, all of which are identified as potentially sensitive receptors. As such land parcel PS19a has potential to have a slightly lower sensitivity than parcel St07 generally.

**Sensitivity to Employment Use**

*The sensitivity of the area lies in the rising slopes to the north east which contain the lower landscape including Stonehouse to the south, its contribution to the setting of the linear rural settlement of Nupend including listed buildings, the watercourse and associated riparian corridor, the openness of the land parcel and its intervisibility with the escarpment to the east. The value of the area lies in the many PROW's especially to the west and the listed buildings in Nupend. Employment in this location would conflict with the scale and character of Nupend and its surroundings and may conflict with proposed site allocation to the south. However, subject to this the land is relatively flat and open to the east and it could be implemented on the lower land to the south east. Consideration should be given to potentially implementing this with nearby sites with a mix of uses to create a more coherent and integrated settlement form on the northern edge of Stonehouse.*

It is again important to note that the Stroud District Landscape Sensitivity Assessment land parcel St07 extends over a large area than the land parcel PS19a. Land parcel PS19a does not extend to Nupend and its listed buildings, all of which are identified as potentially sensitive receptors. As such land parcel PS19a has potential to have a slightly lower sensitivity than parcel St07.

**Discussion**

Parcel PS19a is confirmed to have a broad brush medium landscape sensitivity to both housing and employment development. When considered in greater detail it is assessed that the land parcel has lower sensitivity to the south, south west south east with higher sensitivity to the north and in particular north east. This sensitivity has a strong correlation with the transitional landscape character of the site and its interface with the lower sensitivity River Frome corridor, medium sensitivity agricultural vale and higher sensitivity escarpment footslopes. Please refer to **Figure 9** Landscape Sensitivity Analysis.

**Visual context**

Key views from site	From Public Rights of Way crossing the land parcel towards both the escarpment and into the vale to the west.
Key views into the site	From PROW's within the upper escarpment slopes From the public accessible areas along the upper escarpment including Cotswold Way
Skyline	Distant skyline to west with higher ground west of the Severn visible forming distant skyline

	<p>Close skyline of the Cotswold escarpment to the east.</p> <p>Local skyline formed by vale hedgerow vegetation to the north</p> <p>Distant skyline to the east formed by distant escarpment seen over local vale hedgerow vegetation.</p>
Intervisibility/openness/enclosure	Generally open throughout but with greater openess to north and north east in association with higher ground.
Visual detractors	None
<b>Visual Context and Prominence:</b>	
<p>The land parcel is generally quite open but the well treed landscape to the immediate south introduces some containment which is extended by the hedgerows which extend northwards from Stagholt Farm and west of Pidgemore Farm. This established vegetation also corresponds to the lower lying land within the parcel enhancing the sense of containment. The higher areas of the land parcel are quite open although the field hedge that separates the land west and east of the farm track to Stagholt Farm brings some local containment to the eastern margin of the western field.</p> <p>Views into the land parcel are limited from the south, south east and west due to this vegetation but more extensive from the east and north east. Views from the north into the site are limited by both landform and established field boundary vegetation.</p>	
<b>Potential Visual Receptors:</b>	
Walkers using site Public Rights of Way	<p>Represented by viewpoint photograph</p> <p>Walkers experience direct and expansive views to the escarpment to the east and high ground to the west of the vale to the west.</p>
Walkers using track/bridleway from Black Bridge	<p>Represented by viewpoint photograph</p> <p>Walkers experience potential views to the south west over the field east of the Stagholt Farm track. Views into the remainder of the land parcel are more limited by established hedgerow vegetation.</p>
Walkers generally using public rights of way on the mid to upper escarpment slopes	<p>Represented by viewpoint photograph</p> <p>Generally from the mid to upper slopes where public access is gained through public rights of way, there is potential to experience extensive and panoramic views into the vale to the west, south west and north west. The site land parcel has potential to be seen within the foreground/ middle ground of these views.</p>

<p>Walkers using the Cotswold Way south of Standish Wood</p>	<p>Represented by viewpoint photograph</p> <p>Limited views from a short length of the Cotswold Way immediately south of Standish Wood where clear views to the west and south west are available. Views are expansive and panoramic generally with the land parcel seen in the middle /foreground of the view.</p>
<p>Walkers at Haresfield Beacon</p>	<p>Represented by viewpoint photograph</p> <p>Views to the south and south west into the vale which are extensive and panoramic. Site is seen in the middle / longer distance view.</p>
<p><b>Discussion</b></p>	
<p>The public rights of way within the land parcel due afford scenic views both into the vale and to the Cotswold escarpment. These views are not unique to this location but are scenic and without detractors. Maintaining a rural setting and intervisibility with the wider vale and in particular the Cotswold escarpment is a constraint to development.</p> <p>Views into the land parcel from the elevated viewpoints along the escarpment are scenic and inform the vale setting to the western margin of the AONB. The land parcel itself has limited features which are indistinct when seen from the escarpment, but its value lies in its openness and rural character.</p> <p>Maintaining the rural vale character of the broader vale as seen in elevated views from within the AONB is a constraint to development. Maintaining rural footpath setting and views to the escarpment and into the vale from site public rights of way is also a constraint to development.</p>	
<p><b>Visual Sensitivity</b></p>	
<p>The Stroud District Landscape Sensitivity Assessment (December 2016) identifies land parcel St07 to have medium sensitivity to both housing and employment development. The main visual sensitivity is associated with potential intervisibility of development on higher land within the land parcel to potential sensitive receptors to the north and on the escarpment. Land parcel PS19a contains the most elevated land within the wider land parcel assessed by Stroud District. It is therefore assessed to have slightly higher visual sensitivity for this higher land than the medium sensitivity identified in the Landscape Sensitivity Assessment.</p>	
<p><b>Summary of constraints and opportunities</b></p>	
<p>A summary of landscape constraints for land parcel PS19a are as follows:</p> <ul style="list-style-type: none"> <li>• Maintain a rural setting to the existing public rights of way that pass through the land parcel</li> <li>• Maintain the rural vale setting to the AONB</li> <li>• Maintain the sense of transition from the escarpment to the vale landscape</li> <li>• Maintain the rural vale setting to Stonehouse</li> </ul>	

- Maintain the rural vale setting to the adjoining allocated development land

A summary of visual constraints for land parcel PS19a are as follows:

- Maintain the rural character of the settled vale in views from the AONB
- Maintain intervisibility with the existing public rights of way that pass through the land parcel with the wider vale to the west and the escarpment to the east

**Opportunities:**

- Improve public footpath links to Black Bridge from the West Stonehouse allocated development land south of the land parcel
- Extend the well treed landscape of the Frome Valley to extend green infrastructure
- Create a 'seamless' extension to the existing approved West Stonehouse allocation site.

**Mitigation and landscape strategy**

The Stroud Landscape Sensitivity Assessment defines its medium landscape parcel sensitivity calibration to mean *'Landscape and/or visual characteristics of the land parcel are susceptible to change and/or its values are medium/low through to medium/high and/or it may have some potential to accommodate the relevant type of development in some defined situations without significant character change or adverse effects. Thresholds for significant change are intermediate'*

Mitigation measures both inherent through spatial and architectural design and by the provision of strategic new green infrastructure has potential to contain or limit significant character change or potential adverse effects from development within the land parcel. These measures are set out in summary below and considered further in the landscape strategy for the site.

**Potential mitigation through layout consideration**

- Density and distribution of buildings. Lower density and lower roof heights in areas of higher ground to the north and north east
- Height and prominence of buildings limited at interface with open countryside particularly on higher ground to north and north east.
- Settlement character variation with higher density urban character in lower areas away from interface with open countryside and lower density, rural character development along margins. Large agricultural scale buildings incorporating a pallet of dark colours and textured finishes to break the mass of built form may be appropriate where seen in the context of agricultural building and the railway towards the eastern margin of the land parcel. These could in themselves act as a screen to other areas of the land parcel.
- Provision of strategic open space to achieve intervisibility from site footpaths to the wider rural landscape.

**Potential mitigation through green infrastructure considerations**

- Retention of existing green infrastructure to protect existing habitats and provide landscape anchors for new green infrastructure
- Strong rural character to new green infrastructure to reflect the rural character and enhance potential for new habitat creation

- Strategic green infrastructure to along line of Stagholt Farm track to link southern boundary with northern site boundary. This can achieve practical division of the land parcel into smaller scale areas to reduce the visual scale of development.
- Strategic green infrastructure along western boundary to link existing green infrastructure south of land parcel to northern site boundary and maintain separation with Pidgemore Farm and Nupend to the west
- Strategic green infrastructure along northern boundary to define and strengthen buffer between settlement interface with the open vale countryside to the north.
- New green core along the alignment of the existing public right of way which provides strategic link to Black Bridge.

### Landscape Strategy

A landscape strategy which integrates the mitigation measures set out above, is set out below:

- Development proposals should respond to the transitional nature of the land parcel by extending the character of the well treed landscape of the Frome Valley which forms the setting for allocated land to the south. This increases the capacity of the landscape to accommodate higher density development with limited landscape and visual effects. Development should maintain an agricultural character at its interface with the landscape to the north east and a mixed agricultural /small scale settlement character with the open countryside to the north. To the west the development should seek to achieve a green buffer between the land parcel and the agricultural landscape that forms the setting to Nupend and Pidgemore Farm.
- The well treed character of the landscape south of the land parcel to be extended along the line of the existing hedgerow and track at Stagholt Farm. This provides an opportunity to create a significant green screen buffer between the lower lying land with greater capacity for development, from the higher lying land with greater potential constraints. This buffer has potential to extend the well treed character up to the northern boundary of the land parcel, where it can be extended east to west to simultaneously create a robust and visible green buffer with the open agricultural landscape to the north. This extensive belt of new and existing green infrastructure will be prominent in views from the north, east and north east where it will be seen to be a part of the well treed landscape that forms the setting to the allocated land. Although the openness of the present land west of Stagholt Farm will be lost in views, the well treed character will be seen to diffuse views of built form and replicate the smaller scale pattern of settlement already seen within the expansive views into the vale.
- Land to the east of Stagholt Farm track should maintain an agricultural character but incorporate greater tree planting so that development features are diffused in elevated views from within the AONB. Larger scale employment can be accommodated where architectural and spatial design creates built form that has agricultural qualities reflected in simple form and darker toned materials, clustered or grouped more informally and contained by dense tree planting. This area of the land parcel has some capacity for residential development where the scale and detailing similarly reflects that of the local rural settlement. Again, tree planting and strengthening of hedges so that only partial views of new built form will be important to diffuse the visual prominence of new development when seen from the AONB. Whilst new built form would be seen within a new framework of green infrastructure, this would not be out of context with the character of settlement seen within the vale.

Please refer to **Figure 10** Potential Green Infrastructure

#### **OVERALL SUMMARY:**

Land parcel PS19a consists of a number of open agricultural fields laid to pasture or in arable production adjoining Stagholt Farm to the immediate west of the main railway line, north of Stonehouse. The land is contained by hedges in varying condition with occasional hedge trees and gently ascends from south west to north east.

The farmland is not protected by designation and is assessed not to form part of a valued landscape. The land parcel does lie close to the western boundary of the Cotswolds AONB which lies east of the main line railway. The land parcel does form part of the general vale setting of the AONB and is identifiable in views from the elevated landscape of the Cotswold escarpment. The land parcel does not have any distinctive attributes but forms part of the much wider rural, settled vale landscape which is experienced in frequently panoramic and expansive local views.

The context of the land parcel is important to its sensitivity with the higher ground to the north east having greater potential sensitivity than the lower lying ground to the south and west. This is due to a more open aspect and potentially greater intervisibility with views from within the AONB. The well treed landscape to the immediate south of the land parcel has a greater association with the well treed and settled landscape of the Frome Valley. Its allocation as future development land is important to the context of land parcel PS19a as the site. Once the West of Stonehouse urban extension is complete the land will become the interface with the open countryside. Existing landscape sensitivity assessment has identified that the land parcel lies within a larger parcel (St07) which has been assessed to have medium sensitivity to residential and employment development.

A number of public rights of way cross the land parcel from where long distance views are obtained both into the vale and of the Cotswold escarpment. Of these footpaths the main PRoW which centrally crosses the land parcel is the most strategic as it provides a link from the allocated land SA2 to land north of Stonehouse via the Black Bridge crossing to the mainline railway.

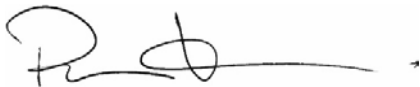
The rural landscape character of the land parcel does form part of the rural vale setting to the Cotswolds AONB and it falls within views both to and from the AONB. The vale landscape character which forms the setting to the AONB and is the focus of expansive and panoramic views, is a settled landscape. This landscape is experienced as a mosaic of agricultural fields, settlement and vegetation predominately associated with field boundaries but also including small copses and riparian vegetation along local watercourses. Larger urban and commercial areas are seen within this vale landscape, but they are also seen to be contained by vegetation so that their potentially urbanising effect on landscape character and views is contained and limited. Mitigation measures through strategic planting would therefore be beneficial to reflect this characteristic of the vale landscape and visual amenity.

The present land parcel is generally open but has a framework of field hedges that already link to the well treed landscape to the south. By extending and developing these areas as strategic green infrastructure it is possible to create a number of smaller land parcels that have greater potential for development which limit and contain potential urbanising effects of the character of the landscape as seen in elevated views from the AONB. The provision of strategic open space within the main land parcel also provides

opportunity to maintain key views out from the land and provide further subdivision of space for smaller scale development, in keeping with the scale and appearance of that already seen in the vale landscape.

The cluster of smaller development parcels set within a framework of green infrastructure will contain new development and retain a rural character to the settlement area. This character will be experienced as a textured, settled landscape much as already seen in views from the escarpment. As such the potential magnitude of change that might be experienced from the AONB is more likely to be lower. With the panoramic and expansive views experienced from the elevated escarpment, the developed land parcel with mitigation measures in place, will still only form a fraction of the overall view into the settled vale.

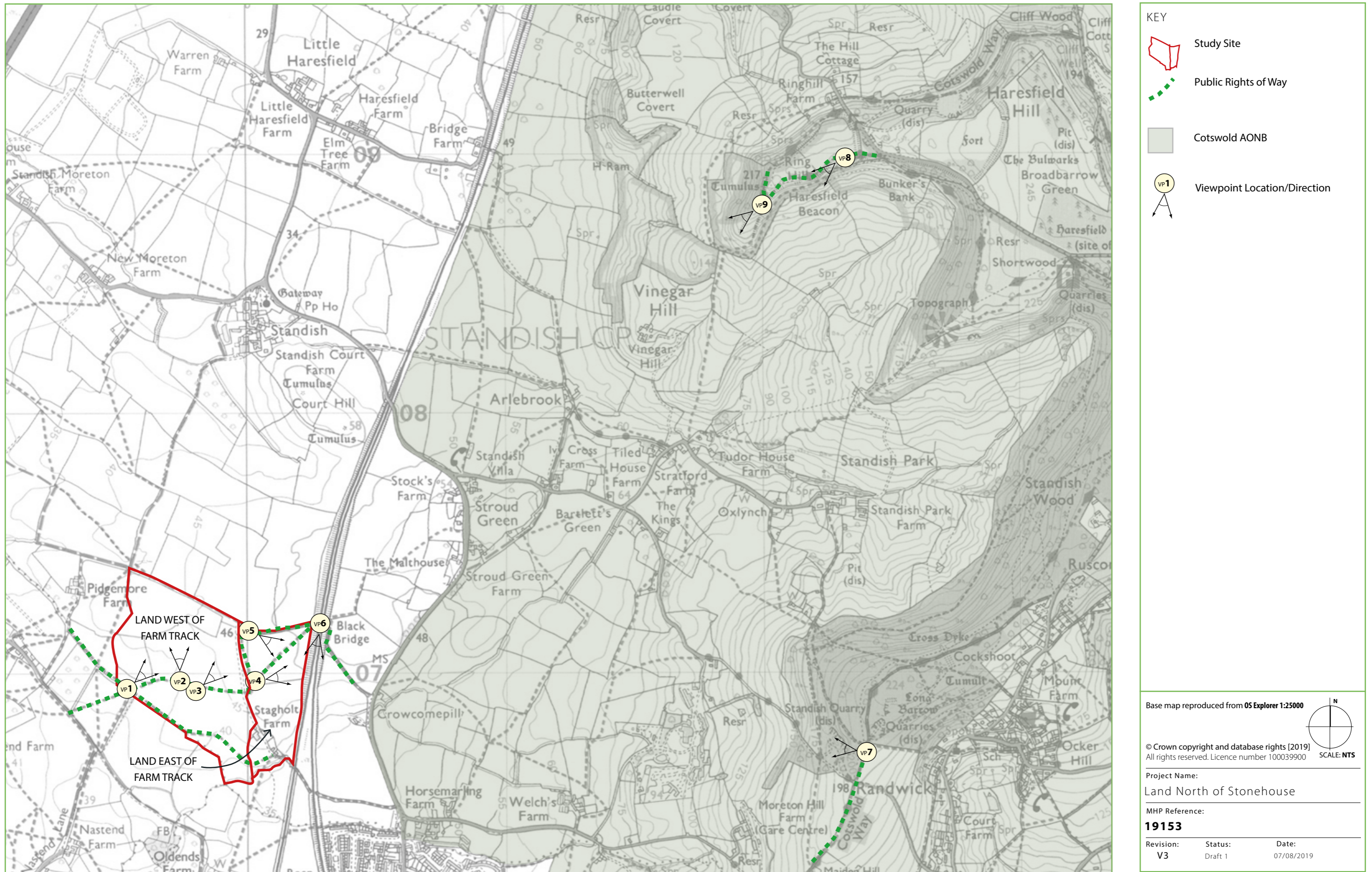
The development of parcel PS19a would appear as a seamless part of the well treed settlement of the allocated SA2 land with a new interface with the open countryside formed by the new buffer of green infrastructure located along the northern boundary of the land parcel. This approach protects the settled rural landscape character already experienced from the AONB and replicates the successful mitigation woven into the masterplan for the allocated land south of the land parcel.



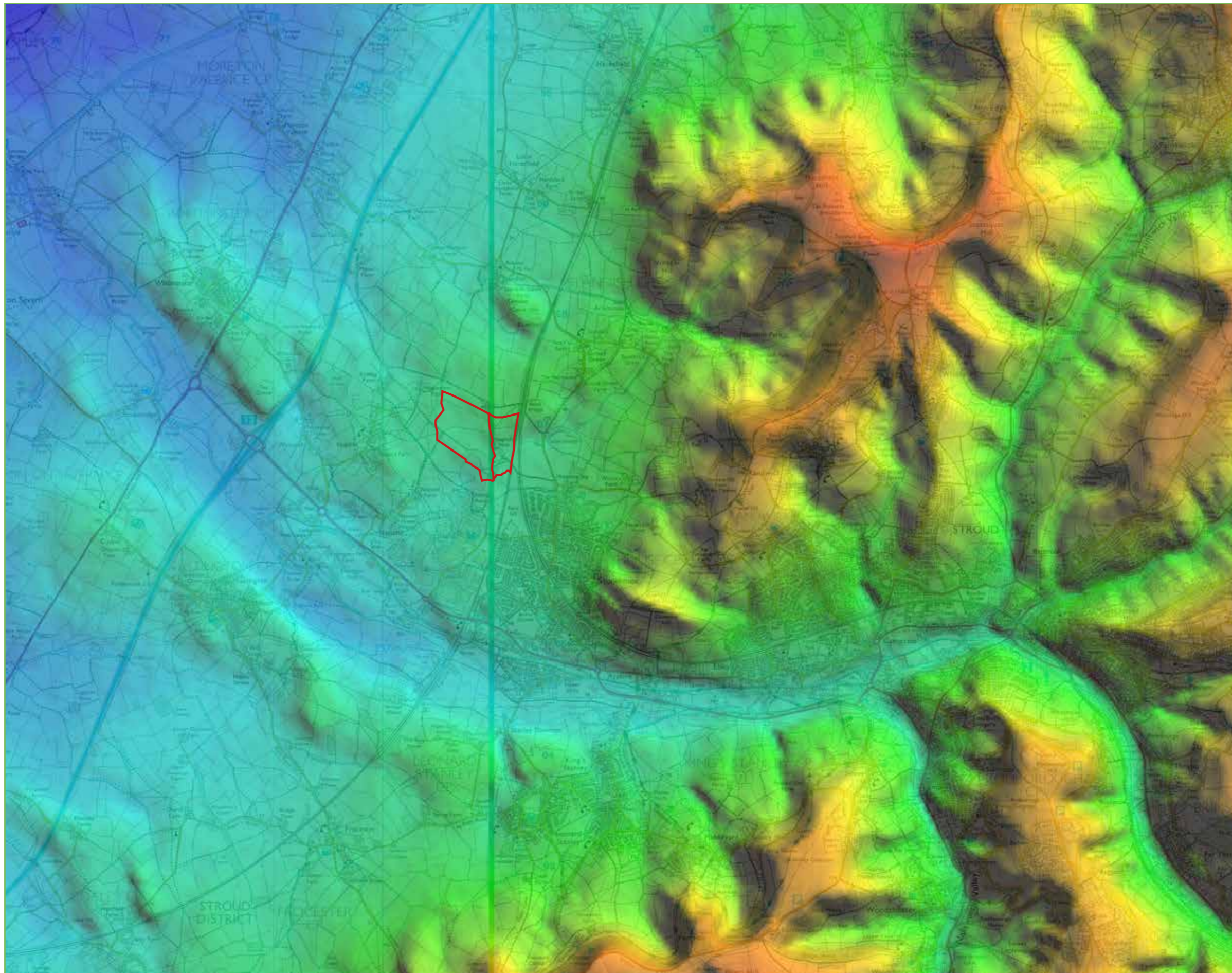
Paul Harris CMLI  
MHP Design Ltd  
Chartered Landscape Architects

7<sup>th</sup> August 2019



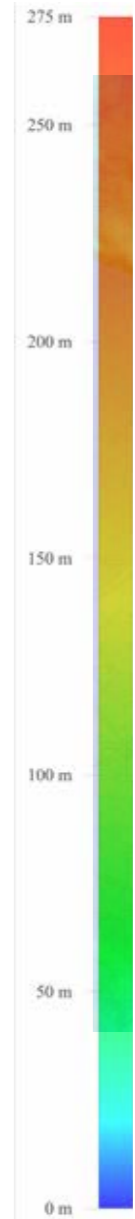


**Figure 1** Site Location, Designations, Context and Viewpoint Photograph Locations  
19153 Land North of Stonehouse



KEY

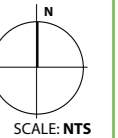
 Study Site



Units: Metres (AOD)

Base map reproduced from OS Explorer 1:25000

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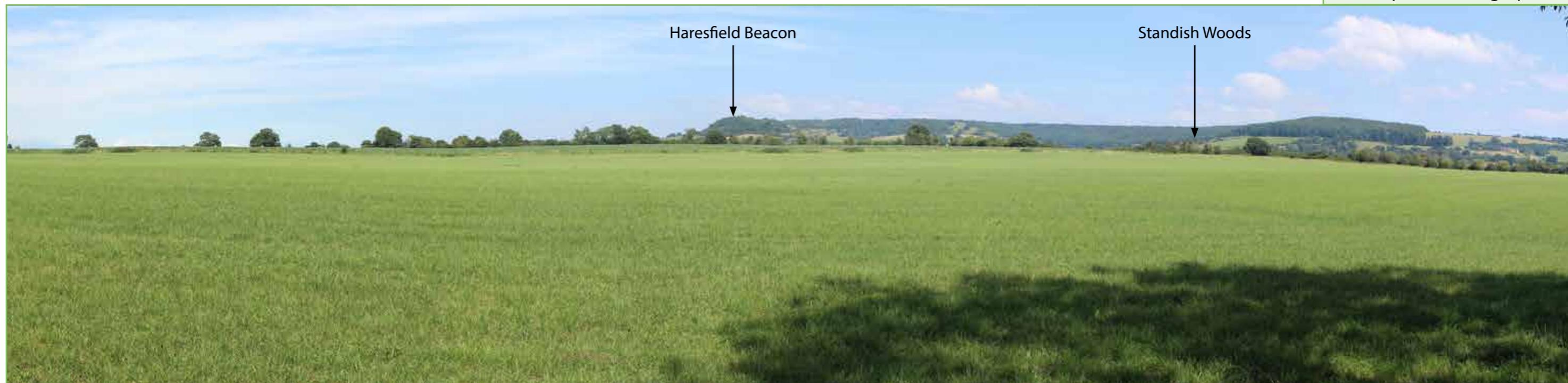
Project Name:  
Land North of Stonehouse

MHP Reference:  
**19153**

Revision:	Status:	Date:
V3	Draft 1	06/08/2019

**Figure 2** Topography  
19153 Land North of Stonehouse

Viewpoint Photograph 1



View looking from PROW land west of farm track towards Cotswold escarpment

Full extent of panorama, taken 24/07/19  
 This is a composite image made up of a number of 50mm photographs joined together horizontally to form an overall field of view which is wider than seen in detail by the human eye.

Viewpoint Photograph 2



View looking from PROW land west of farm track towards Cotswold escarpment south of Stroud

Full extent of panorama, taken 24/07/19  
 This is a composite image made up of a number of 50mm photographs joined together horizontally to form an overall field of view which is wider than seen in detail by the human eye.

**Figure 3** Viewpoint Photographs  
19153 Land North of Stonehouse

Viewpoint Photograph 3



View looking east from PROW to Cotswold escarpment

Full extent of panorama, taken 24/07/19

This is a composite image made up of a number of 50mm photographs joined together horizontally to form an overall field of view which is wider than seen in detail by the human eye.

Viewpoint Photograph 4



View looking east from land east of farm track towards Cotswolds escarpment

Full extent of panorama, taken 24/07/19

This is a composite image made up of a number of 50mm photographs joined together horizontally to form an overall field of view which is wider than seen in detail by the human eye.

Viewpoint Photograph 5



View looking east over the eastern land parcel

Full extent of panorama, taken 24/07/19

This is a composite image made up of a number of 50mm photographs joined together horizontally to form an overall field of view which is wider than seen in detail by the human eye.

Viewpoint Photograph 6



View looking south from Black Bridge

Full extent of panorama, taken 24/07/19

This is a composite image made up of a number of 50mm photographs joined together horizontally to form an overall field of view which is wider than seen in detail by the human eye.

**Figure 5** Viewpoint Photographs  
19153 Land North of Stonehouse



View looking west from the Cotswold Way at the southern edge of Standish Woods

Image captured 24/07/2019



View looking south west from Haresfield Beacon

Image captured 24/07/2019

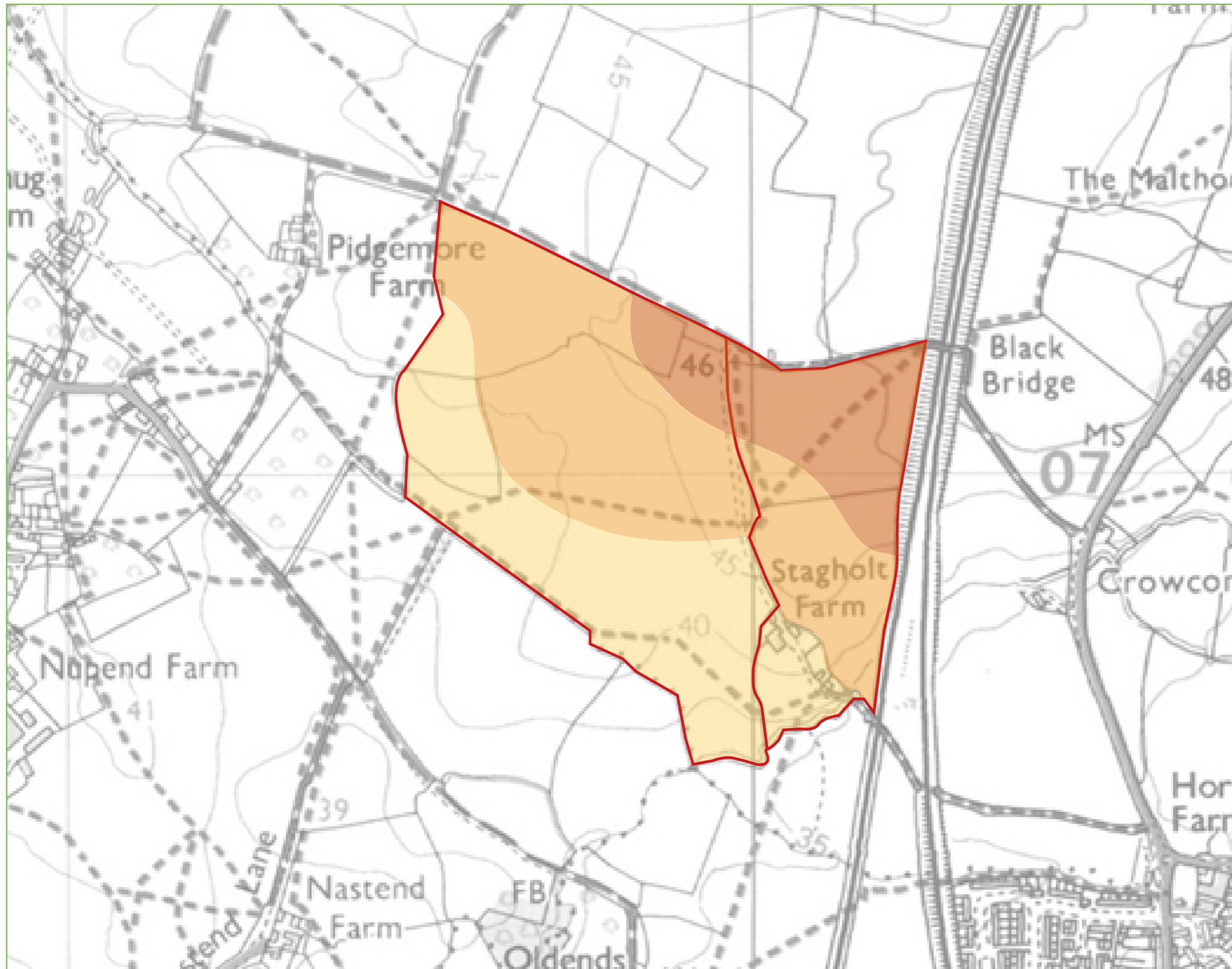
**Figure 7** Viewpoint Photographs  
19153 Land North of Stonehouse







View looking south from Haresfield Beacon

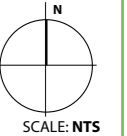
Image captured 24/07/2019





KEY - SENSITIVITY

-  Study Site
-  Medium - High
-  Medium
-  Medium - Low



Base Image source: **Google Earth Pro.**  
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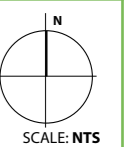
Revision:	Status:	Date:
V3	Draft	07/08/2019

**Figure 9** Landscape Sensitivity Analysis  
19153 Land North of Stonehouse



- KEY
-  Study Site
  -  Potential key strategic green infrastructure (Indicative)
  -  Central open space and footpath corridors

Base Image source: **Google Earth Pro.**  
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Project Name:  
**Land North of Stonehouse**

MHP Reference:  
**19153**

Revision:	Status:	Date:
V3	Draft	07/08/2019

**Figure 10** Potential Green Infrastructure  
19153 Land North of Stonehouse