

Strategic Environmental Assessment (SEA) of the Standish Neighbourhood Plan

Environmental Report

Standish Parish Council, Gloucestershire

April 2021

Quality information

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Non Technical Summary

What is Strategic Environmental Assessment (SEA)?

A strategic environmental assessment (SEA) has been undertaken to inform the Standish Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Standish Neighbourhood Plan?

The Standish Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. It is being prepared in the context of the Stroud District Local Plan 2011-2031 (adopted in 2015), and the emerging Stroud District Local Plan Review which will have a plan period to 2040.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (February 2021), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Standish Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the Standish Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area;
- The SEA Framework of objectives against which the Standish Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Standish Neighbourhood Plan;
- The likely significant effects of the Standish Neighbourhood Plan;

- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Standish Neighbourhood Plan; and
- The next steps for the Standish Neighbourhood Plan and accompanying SEA process.

Assessment of reasonable alternatives for the Standish Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Neighbourhood Plan

However, it is apparent that the Parish Council is very limited in terms of potential alternatives to the draft plan that can be considered.

This is due to the specific circumstances of the proposed Neighbourhood Plan site allocation at Stagholt Farm in terms of the reason for its nomination by the landowner, its spatial relationship with adjacent strategic allocations and its potential to deliver the objectives of the Neighbourhood Plan.

Alternative site options

No alternative site options have been identified for potential allocation through the Neighbourhood Plan. Fundamentally, this reflects the key fact that the allocation of Stagholt Farm is not driven by the need to meet a housing target, but rather to rationalise available land to enable a coherent strategic scheme.

The absence of a housing target and the absence of evidence of local housing need within Standish – plus the general presumption against development in Tier 5 settlements in the Local Plan - means that there is no need for the Parish Council to undertake a call for sites to explore potential locations for growth within Standish. This highlights the fact that Stagholt Farm is additionally unique in the context of the plan area as having potential to function as a part of the Stonehouse urban area, i.e. a Tier 1 settlement rather than any of the Tier 5 settlements elsewhere in the parish.

Alternative spatial strategy options

In the absence of a housing target or evidence of local housing need, and on the understanding that allocation of Stagholt Farm is proposed to achieve a specific and unique purpose in the context of the plan area, it is not possible to derive meaningful spatial strategy alternatives to the draft Neighbourhood Plan. A 'do nothing' scenario is not a reasonable alternative to test, as this is the existing baseline without a plan.

On this basis, it is considered that **there are no reasonable alternatives** to the preferred spatial strategy for the Standish Neighbourhood Plan.

Assessment of the draft and latest version of the Standish Neighbourhood Plan

In early 2021, an initial draft version of the Neighbourhood Plan was assessed through the SEA process. This was with a view to informing and influencing the development and finalisation of the Neighbourhood Plan. In this respect a number of recommendations were made for enhancing the Neighbourhood Plan.

These recommendations are set out in Table 5.3 in the main body of the Environmental Report.

The assessment of the latest version of the Neighbourhood Plan is presented in Chapter 5 of the Environmental Report. The assessment has found that the policies and proposals of the Neighbourhood Plan are likely to give rise to minor long term positive effects in relation to the Biodiversity, Climate Change, Community Vitality and Landscape SEA themes and neutral effects are anticipated in relation to the Historic Environment and Natural Resources SEA themes. Significant negative effects are not anticipated in relation to any SEA theme.

Next steps

This Environmental Report accompanies the submission version of the Standish Neighbourhood Plan for submission to the Local Planning Authority, Stroud District Council, (SDC) for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted Stroud District Plan and emerging Local Plan Review.

If Independent Examination is favourable, the Standish Neighbourhood Plan will be subject to a referendum, organised by CDC. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Standish Neighbourhood Plan will become part of the Development Plan for Stroud district, covering the defined Neighbourhood Plan area.

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1. Introduction

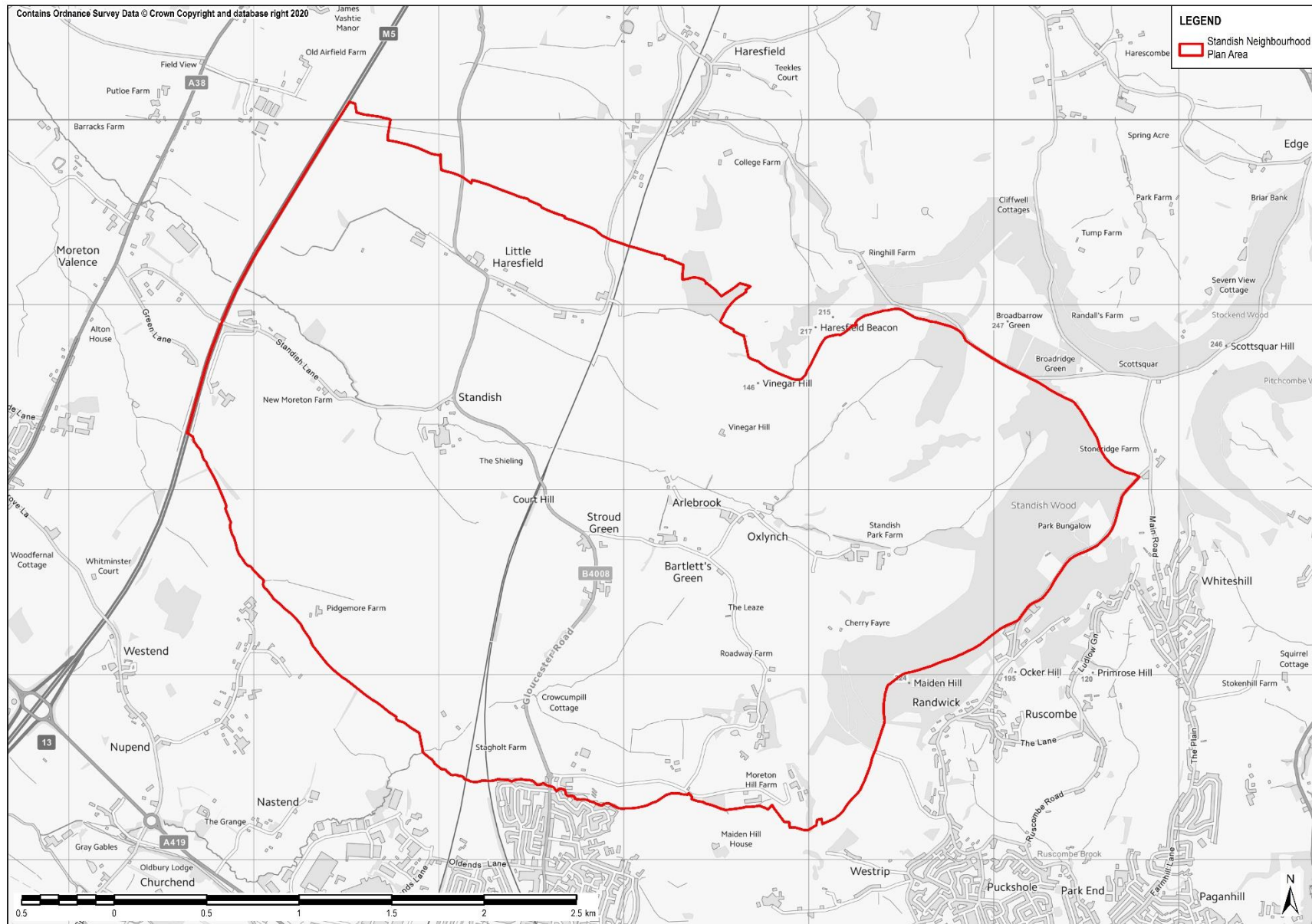
Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Standish Neighbourhood Plan.
- 1.2 The Standish Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Stroud District Local Plan 2011-2031 (adopted in 2015), and the emerging Stroud District Local Plan Review which will have a plan period to 2040.
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to Stroud District Council in Spring 2021. The Neighbourhood Plan is at an advanced stage of preparation and has already undergone Regulation 14 consultation. The SEA has therefore informed and influenced the **submission** version of the Neighbourhood Plan, as detailed in Chapter 5 of this report.
- 1.4 See **Table 1.1** for key information relating to the Standish Neighbourhood Plan.

Table 1.1: Key facts relating to the Standish Neighbourhood Plan

Authority	Standish Parish Council
Title of plan	Standish Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Standish Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the adopted Stroud District Local Plan and the draft policies of the emerging Stroud District Local Plan Review.</p> <p>The Standish Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2040
Area covered by the plan	The Neighbourhood Plan area covers the Parish of Standish, in Gloucestershire (Figure 1.1).
Summary of content	The Neighbourhood Plan sets out a vision, strategy and policies for the Neighbourhood Plan area.
Plan contact point	Sue Oppenheimer sueoppenheimer@gmail.com

Figure 1.1 The Standish Neighbourhood Plan area



SEA explained

1.5 The Standish Neighbourhood Plan was screened in by Stroud District Council as requiring Strategic Environmental Assessment (SEA) in July 2020, in a combined screening opinion for SEA and HRA. The screening opinion does not identify a specific receptor or feature which might be sensitive to significant effects from the proposals of the Neighbourhood Plan. Rather, the screening opinion simply gives the following view:

“It is our opinion that the plan will require SEA/HRA as it proposes to allocate a site”

1.6 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan’s contribution to sustainable development.

1.7 The SEA has been prepared in conformity with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). This has included an initial scoping stage to determine the scope of the SEA. The proposed scope was consulted upon with the statutory consultees of Natural England, Historic England and Environment Agency. More details on this process can be found in **Chapter 3** and **Appendix II** of this report.

1.8 The SEA Regulations require that a report (known as the Environmental Report) is published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.9 More specifically, the report must answer the following three questions:

1. What has plan-making/ SEA involved up to this point?

- Including in relation to ‘reasonable alternatives’

2. What are the appraisal findings at this stage?

- i.e. in relation to the plan.

3. What are the next steps at this stage?

1.10 Therefore, this report essentially answers questions 1, 2 and 3 in turn in order to provide the required information.

1.11 First, the relevant aspects of the local planning policy context are explored in order to set the scene.

2. Local planning policy context

- 2.1 The Standish Neighbourhood Plan is being prepared in the context of the Stroud Local Plan 2011-2031 (adopted in 2015) and in the context of the emerging Local Plan Review which will have a plan period to 2040.
- 2.2 These documents are explored in more detail in turn below.

Adopted Stroud District Local Plan (SDLP)

- 2.3 The Stroud District Local Plan covers a plan period to 2031 and was adopted in November 2015.
- 2.4 Core Policy **CP2** (Strategic Growth and Development Locations) of the SDLP establishes that at least **11,400 new dwellings** will be delivered in the district over the plan period. Of this total, 3,300 new dwellings are allocated at five strategic sites around the district. The largest of these is the West of Stonehouse strategic site immediately south of Standish. This site is explored further under the sub-heading below.
- 2.5 Core Policy **CP3** (Settlement Hierarchy) establishes a five-tier settlement hierarchy for the district as follows:

Tier 1: Accessible Local Service Centres → Tier 2: Local Service Centres → Tier 3: Accessible Settlements with Limited Facilities → Tier 4: Accessible Settlements with Minimal Facilities → Tier 5: Unclassified
- 2.6 None of the settlements within the Neighbourhood Plan area, including Standish village, are large enough to feature at any tier of the hierarchy, meaning that they will be “*treated as open countryside, where development will be restricted*”. Accordingly, the settlements within Standish parish are given no housing target and no site allocations through the Local Plan.
- 2.7 However, the West of Stonehouse strategic site allocation is immediately adjacent to the parish and is important to understand in more detail to appreciate its significance in relation to the Neighbourhood Plan area.

West of Stonehouse strategic site (Great Oldbury)

- 2.8 Policy **SA2** (West of Stonehouse) of the adopted SDLP allocates land west of Stonehouse for a strategic mixed use development comprising:
 - 1,350 new dwellings, including at least 405 (i.e. 30%) affordable;
 - 10ha of B-class employment²;
 - A local centre, incorporating local retail and community uses;
 - A two form entry primary school;
 - Various landscaping, open space and green infrastructure features.
- 2.9 The allocation is currently being built out and is expected to continue to deliver housing completions to 2027/2028 as per the Stroud District Council (SDC)

² As of September 2020 the use class order has been amended and B-class employment uses now comprise part of the new E use class.

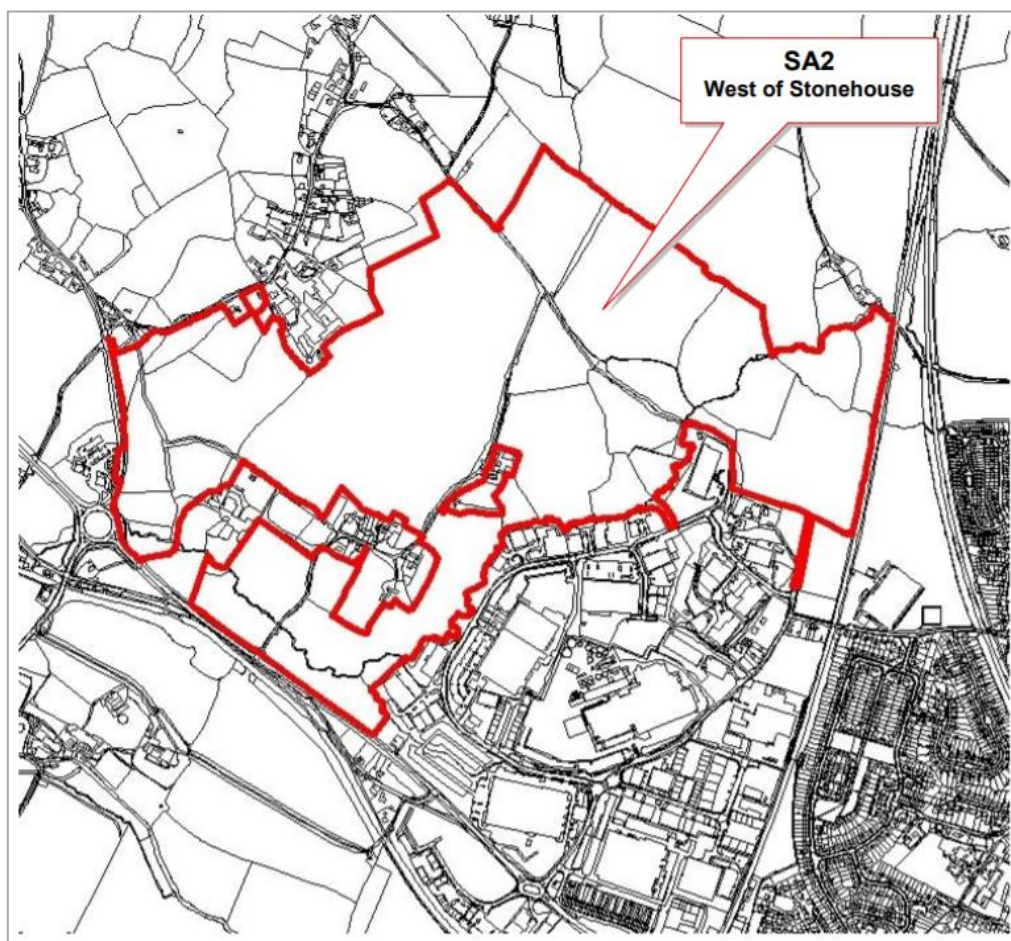
2020 Annual Monitoring Report (AMR).³ The allocation is now also referred to as Great Oldbury, reflecting the developer's branding of the development.

2.10 Spatially, the West of Stonehouse allocation is an extension of the existing built area of Stonehouse, though administratively it falls largely within Eastington parish. The allocation abuts the southern boundary of Standish parish between the Bristol-Birmingham railway line and Pidgemore Farm, a total interface of around 1km. A small area of the allocation also incurs into Standish parish at its north eastern extent.

2.11 Currently, the Standish parish boundaries with both Eastington parish and Stonehouse town are largely undeveloped and rural in character, meaning that as the West of Stonehouse allocation continues to be built out to 2027/28 the character of the Neighbourhood Plan area along its southern boundary could significantly change, likely coming much more strongly under the influence of adjacent development.

2.12 The West of Stonehouse strategic allocation is presented in **Figure 2.1** below:

Figure 2.1 West of Stonehouse strategic site, as per the adopted SDLP



³ <https://www.stroud.gov.uk/media/1411155/5yrs-november-2020-update-report.pdf>

Emerging Local Plan Review (LPR)

- 2.13 Stroud District Council (SDC) is currently preparing a review of the adopted SDLP. Two consultations were undertaken at Regulation 18 stage – first, an initial ‘Issues & Options’ consultation took place during autumn 2017, followed by a second public consultation on the Emerging Strategy which ran from 16th November 2018 until 18th January 2019.
- 2.14 Most recently, SDC undertook Regulation 19 consultation on the full Draft Local Plan between 20th November 2019 and 22nd January 2020. Submission to the Secretary of State is currently anticipated in mid-2021.
- 2.15 The LPR sets a target to deliver at least **12,800 new dwellings** within the district to 2040, with a **residual need of around 8,000 new dwellings** once completions and commitments are accounted for. The preferred spatial strategy proposes concentrating most of this growth at district’s three main settlements of Cam and Dursley, Stonehouse and Stroud.
- 2.16 These three main settlements continue to sit at the top of an amended four-tier settlement hierarchy outlined by Core Policy **CP3** of the LPR, organised as follows:
1. Main Settlements
 2. Local Service Centres
 3. a) Accessible Settlements with Local Facilities
b) Settlements with Local Facilities
 4. a) Accessible Settlements with Basic Facilities
b) Settlements with Basic Facilities
- 2.17 However, none of the settlements in the Neighbourhood Plan area, including Standish village itself, are large enough to be given a defined settlement boundary, or ‘settlement development limit’ (SDL) meaning that none appear on the settlement hierarchy. The LPR is clear that “*very small settlements not mentioned in the settlement hierarchy will be treated simply as countryside*” where there is a presumption against most forms of residential development (other than some specific exceptions such as agricultural workers dwellings and conversions of agricultural buildings).
- 2.18 The LPR also organises the district’s settlements into functional ‘parish clusters’ for the purposes of understanding and responding to “*particular needs and opportunities that most concern different parts of the District*”. Eight clusters are identified in total. Standish forms part of the Stonehouse cluster, along with the villages of Eastington, Frocester, Kings Stanley and Leonard Stanley.
- 2.19 In painting a spatial portrait of the Stonehouse cluster, the LPR describes Stonehouse as “*the second most populous town in the district, with a good range of services and shops at its centre*”. In contrast, Standish is characterised as “*amongst the most sparsely populated parishes in the district, with a strong rural character*”.

Northwest of Stonehouse strategic proposed site (PS19a)

2.20 The LPR proposes three new strategic site allocations in the Stonehouse cluster in order to meet “*local and strategic growth needs*”.

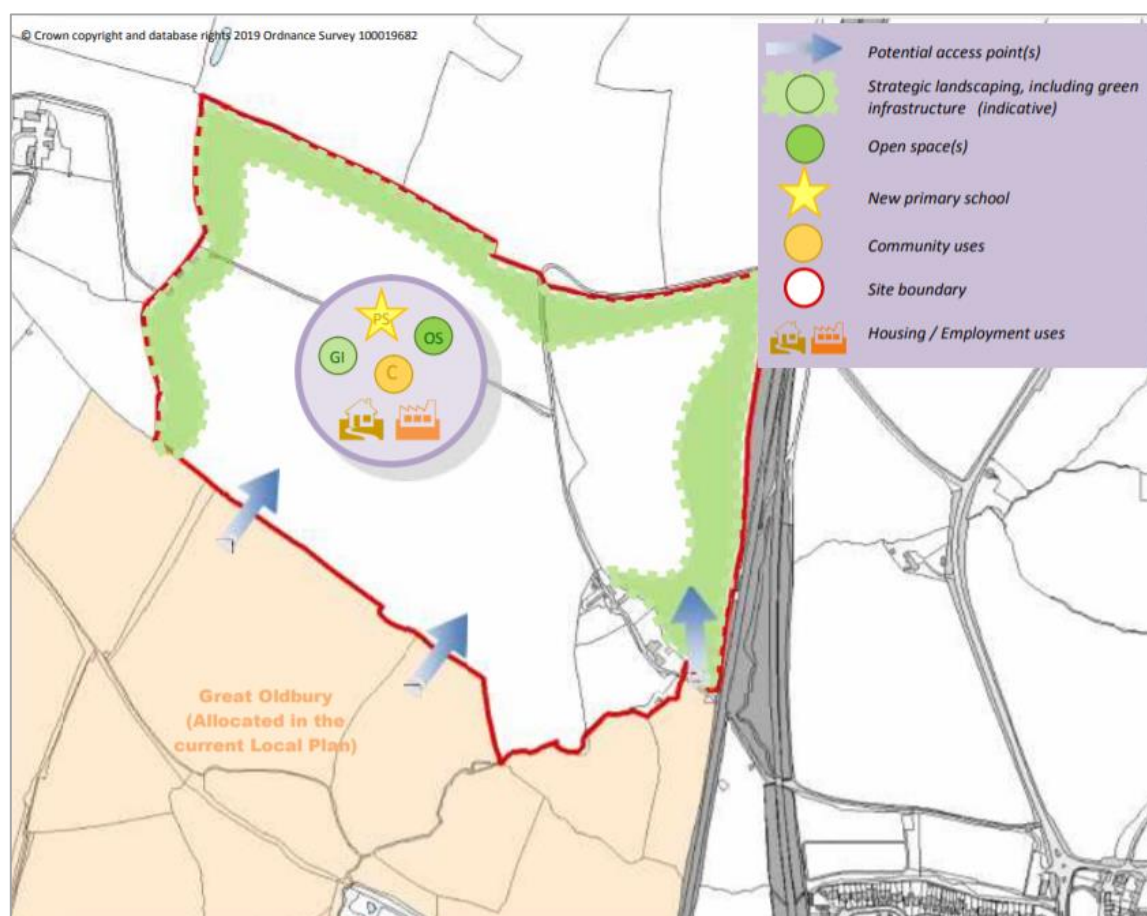
2.21 One of these options – proposed site PS19a – falls entirely within the boundary of Standish parish, and therefore entirely within the Neighbourhood Plan area. Currently, the southern boundary of Standish broadly marks the northern extent of strategic growth at the West of Stonehouse strategic site allocation, as discussed above. Should PS19a be taken forward in the adopted LPR, this would represent the first significant incursion into Standish parish of strategic growth north of Stonehouse.

2.22 Site PS19a proposes development of:

- 650 new dwellings;
- 5ha of employment floorspace;
- A range of new community infrastructure including a new primary school, local centre, open space, recreation facilities and green infrastructure.

2.23 PS19a lies immediately north of the existing West of Stonehouse strategic site and would represent a contiguous extension of the Stonehouse urban area once the West of Stonehouse allocation is built out. The proposed site is shown in **Figure 2.2**, below:

Figure 2.2 Proposed site PS19a (taken from the Reg 19 draft of the LPR, 2019)



- 2.24 PS19a is understood by the Parish Council to be under three separate ownerships:
1. A private landowner who has engaged Pegasus Planning and Robert Hitchins as site promoters and developers (the majority of the site);
 2. Gloucestershire County Council, and;
 3. A private landholder and owner of Stagholt Farm.
- 2.25 The proposed allocation of PS19a in the LPR presumes that the entire site will be available as a single entity. However, this does not appear to recognise the complexity introduced by the three separate ownerships.
- 2.26 In particular, the owner of Stagholt Farm has not been involved in working with the two other landowners in seeking to produce a unified scheme for PS19a. Stagholt Farm was initially excluded from PS19a in the 2018 'emerging strategy' consultation on the LPR and was effectively left as an 'island' between existing allocation SA2 and proposed site PS19a.
- 2.27 In order to address this anomaly, the Parish Council began working with the owner of Stagholt Farm with a view to allocating the site in the Neighbourhood Plan. Subsequently, the landowner of Stagholt Farm also nominated to SDC for allocation in the LPR via the SDC call for sites process.
- 2.28 Notwithstanding this, the Parish Council judged that it remained appropriate for the Neighbourhood Plan to continue to propose allocation of Stagholt Farm in order to secure a scheme which best supports the objectives of the Neighbourhood Plan and best reflects the landowner's wishes, whilst also contributing to a coherent overall development at PS19a. The Parish Council are of the understanding this decision was taken in agreement with SDC.

SDC Additional housing options focussed consultation

- 2.29 In August 2020 the Government launched a consultation entitled "Changes to the current planning system" which included proposals for altering the standard method for calculating housing need. The proposed new standard method would have increased Stroud district's housing target above the level planned for in the LPR by between 1,050 and 2,400 homes across the plan period.
- 2.30 It is therefore useful to recognise that in response to this, SDC undertook a focussed consultation in October 2020 on potential additional housing options in the district at which to deliver this additional supply if necessary.⁴ One of the options consulted on proposed meeting this extra housing need by intensifying growth at existing and proposed strategic site allocations, which would have implications for the level of growth at proposed site PS19a in Standish.
- 2.31 However, in December 2020 the government announced that the updated standard method would increase housing targets at only the 20 largest towns and cities in the country. Therefore, housing need in Stroud is understood to remain unchanged. Consequently SDC's 'additional housing options paper' is

⁴ <https://www.stroud.gov.uk/media/1287256/additional-housing-options-consultation-paper-16-10-20-for-web.pdf>

considered to be overtaken by events and does not form part of the planning policy context for Standish.

Vision and objectives of the Standish Neighbourhood Plan

2.32 As part of the development of the Neighbourhood Plan, and in response to the wider strategic context outlined above, the community has established the following vision for the parish by the end of the plan period in 2040:

“In 2040, Standish will be a place where:

- *Public rights of way are safe and accessible;*
- *New housing is carbon neutral with higher standards than other development;*
- *The rural identity of the parish and its tranquil rural character is retained;*
- *Standish has retained its separate identity from Stonehouse;*
- *There is access to a good range of community infrastructure;*
- *Most homes are on standard sewers, on mains water and have access to Broadband;*
- *There is a new village centre that serves the whole community;*
- *Light pollution is controlled;*
- *Black Bridge does not become a road that would lead to rat running to the B4008.”*

2.33 Four detailed policies are proposed by which to achieve and deliver this vision. These are explored and appraised in detail in Chapter 5 of this report.

3. What is the scope of the SEA?

3.1 The scope of the SEA comprises the sustainability issues and objectives that are a focus of, and provide a methodological framework for, the SEA.

SEA scoping report

3.2 The scope of the SEA was established through the SEA Scoping Report which set out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability issues for the Neighbourhood Plan; and
- An ‘SEA framework’ of objectives against which the Neighbourhood Plan can be assessed.

3.3 Further information on the scope of the SEA is presented in **Appendix II**.

Consultation

3.4 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, the Scoping Report was released to these authorities for consultation during a five week consultation period in early 2021.

The SEA framework

3.5 The issues identified through the scoping process were then translated into an ‘SEA framework’. This SEA framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the Neighbourhood Plan is presented in **Table 3.1** below.

Table 3.1 The SEA framework for Standish

SEA theme	SEA objective
Biodiversity	Protect and enhance designated and non-designated biodiversity and geodiversity features.
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan Area.
	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change.
Community vitality	Cater for a range of existing and future residents' needs by supporting growth at locations which support access to key services and facilities, improving the health and wellbeing of residents and promoting sustainable modes of travel.
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area, including both designated and non-designated historic assets.
Landscape	Protect and enhance the character and quality of landscapes and townscapes, including in relation to the Cotswold AONB and its setting.
Natural resources	Ensure the efficient and effective use of land and protect and enhance water quality and use and manage water resources in a sustainable manner.

4. What has plan making / SEA involved to this point?

Overview

- 4.1 Plan-making has been underway in Standish since late 2013 when the Parish Council made an application to Stroud District Council for the parish to be designated as a Neighbourhood Area. The application was approved in February 2014. The extent of the Neighbourhood Area is presented in **Figure 1.1** of this report.
- 4.2 Subsequently, the Parish Council has made significant progress on the preparation of both the Neighbourhood Plan and the evidence base which underpins it, culminating in a draft of the plan undergoing Regulation 14 (pre-submission) consultation between 10th June and 22nd July, 2020.
- 4.3 The plan was subsequently screened in as requiring SEA on 31st July 2020.
- 4.4 This SEA Environmental Report accompanies the submission version of the Neighbourhood Plan. The findings of the SEA have informed and influenced the development of the submission version of the Neighbourhood Plan.

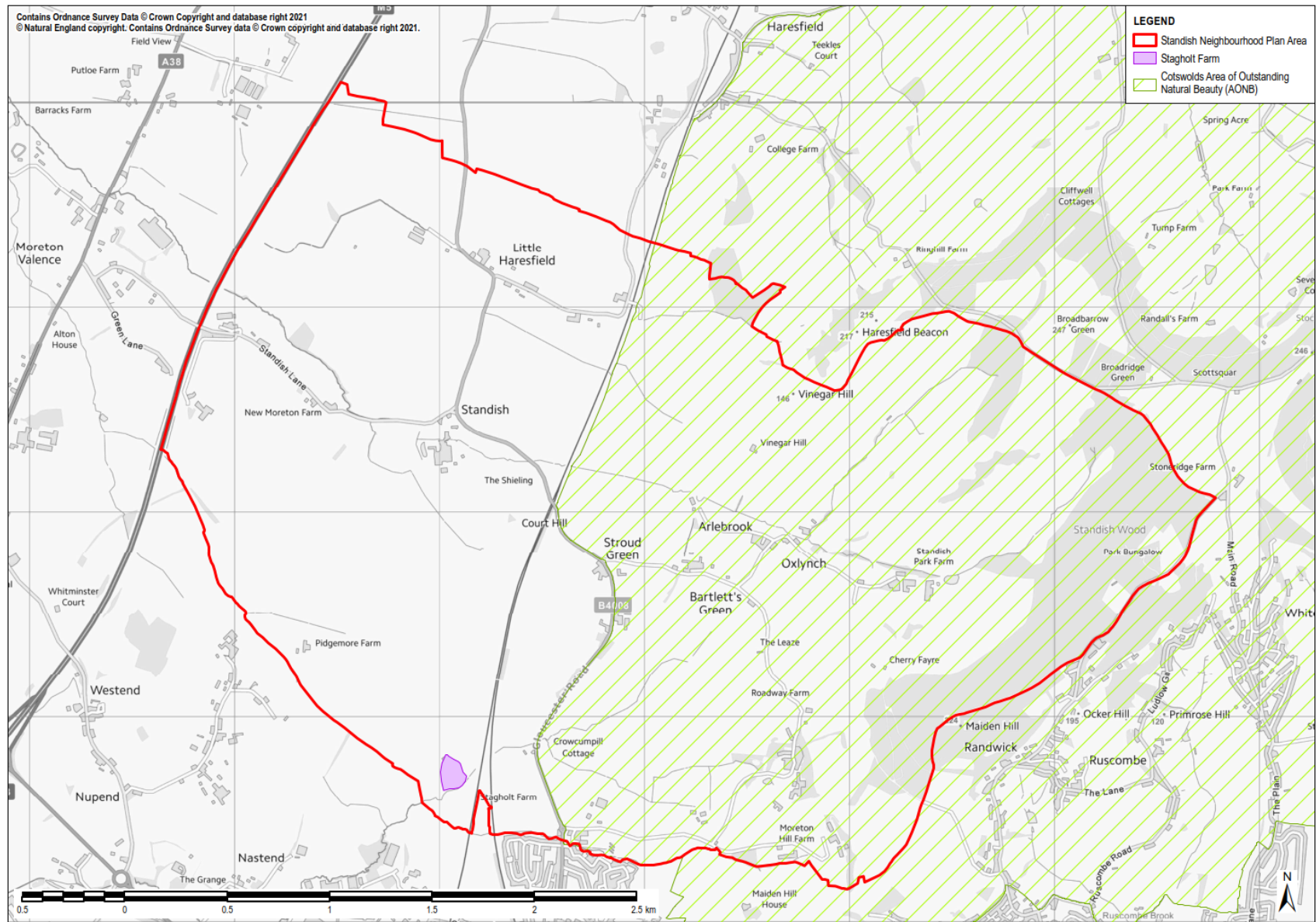
Housing numbers to be delivered through the plan

- 4.5 Standish parish has no settlements large enough to feature on the Stroud District settlement hierarchy and is not allocated a housing target through either the adopted SDLP or emerging LPR. There is no evidence indicating a specific local housing need.
- 4.6 However, as discussed above, significant strategic development is underway immediately south of the parish at West of Stonehouse, whilst further strategic growth is proposed through the emerging LPR entirely within Standish parish.
- 4.7 If the LPR is found sound at examination and adopted by SDC, proposed site PS19a will therefore bring forward around 650 homes *within* the Neighbourhood Plan area. This proposed allocation would be an urban extension to Stonehouse which will function as part of the town and contribute to meeting the district's strategic housing needs rather than needs arising within Standish in isolation.
- 4.8 In this context, it is apparent that there is **neither an identified local housing need nor a residual strategic housing need** to be met through allocations in the Neighbourhood Plan.
- 4.9 Despite this, the Parish Council wish to take forward an element of small-scale development to make best use of available land.

Site options

- 4.10 One site is available for allocation through the Neighbourhood Plan, land at Stagholt Farm – see **Figure 4.1** overleaf. There are no alternative site options.
- 4.11 The available site is discussed further below.

Figure 4.1 Proposed Neighbourhood Plan site allocation at Stagholt Farm in the context of the Neighbourhood Plan area



Stagholt Farm

Site overview

- 4.12 Stagholt Farm is located at the south of the Neighbourhood Plan area, just north of the parish boundary with Stonehouse. The built area of Stonehouse town itself has historically not extended as far as the parish boundary, meaning that traditionally Stagholt Farm's location has been within the open countryside.
- 4.13 The site comprises an area of around 1.6ha and includes the farmhouse itself plus associated open space, hard standing and outbuildings.
- 4.14 Primary access to the site is achieved currently via a restricted local access road which crosses the railway line at Black Bridge and joins the B4008 around 0.5km north of Stonehouse. Secondary pedestrian-only access is available via two public rights of way (PRoW):
- Footpath EST/6 which runs east-west through the site linking the B4008 in the east with Nupend in the west;
 - Footpath EST/6A which forks off the main PRoW, running south to Oldends Farm via the new Great Oldbury development.
- 4.15 The Bristol to Birmingham mainline and the Golden Valley line (linking Swindon and Gloucester) converge a short distance north of the site. Both lines run immediately past the east of the site, severing the site from more direct access to the B4008 and central Stonehouse. This represents a significant constraint in relation to site access from the east, particularly given that the Golden Valley line runs on a raised embankment.
- 4.16 The boundary of the Cotswolds Area of Outstanding Natural Beauty is around 350m to the east of the site. In practice, the setting of the AONB does not extend to the site as it is severed by the combined effect of the B4008 and the two railway lines, particularly the raised Golden Valley line, which interrupt sightlines from the AONB and substantially limits the rural, tranquil character of the landscape around Stagholt Farm
- 4.17 There are no local, national or international biodiversity designations within or adjacent to the site.
- 4.18 A site plan of Stagholt Farm is provided in **Figure 4.2** overleaf, including three labelled sub-areas.
- 4.19 Policy S4 of the draft Neighbourhood Plan identifies the sub-areas within the site as follows:
- Area A: For redevelopment of existing farm buildings as small E-class uses, self-build residential accommodation, small-scale tourism lodging;
 - Area B: For provision of 24 new dwellings (including at least 6 affordable);
 - Area C: For creation of a new wildlife and water management area.

Figure 4.2 Site plan – Stagholt Farm (as per the draft Standish Neighbourhood Plan)



Rationale for nomination

4.20 To address the original anomaly whereby Stagholt Farm was not allocated but was surrounded by PS19a and SA2, the landowner of Stagholt Farm nominated the site through the Stroud LPR call for sites process in 2019.⁵

4.21 The call for sites nomination cites this anomalous relationship with the two strategic sites as a key reason for nomination, stating that:

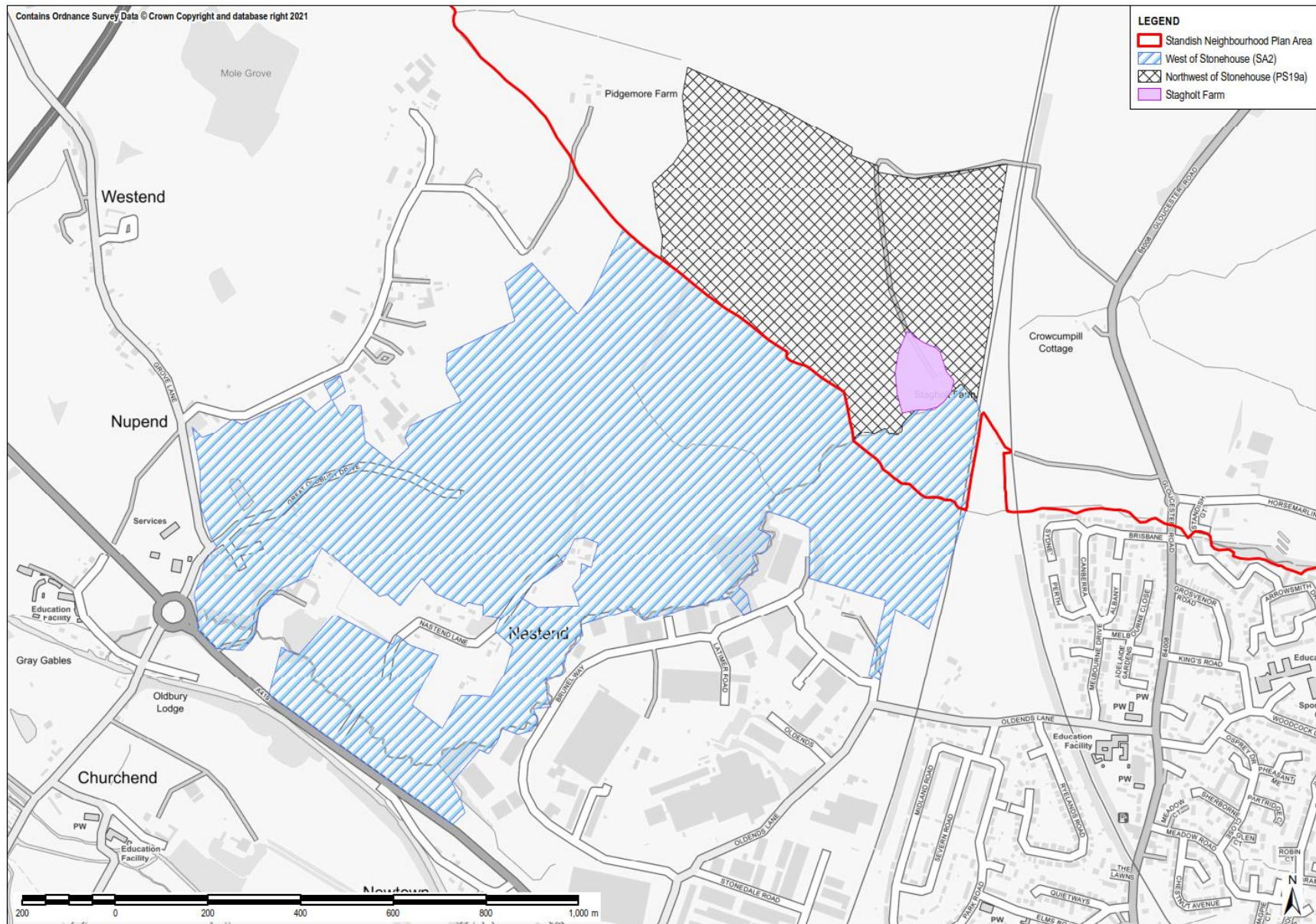
“Stagholt Farm is effectively surrounded by SA2 West of Stonehouse and PS19a – North/Northwest of Stonehouse. A further anomaly is the fact PS19a includes part of Stagholt Farm whilst the remainder has somewhat surprisingly been omitted from both PS19a and SA2”.

4.22 Although Stagholt Farm was subsequently absorbed into the boundaries of proposed site PS19a, its late inclusion means it has not formed part of masterplanning work undertaken for the rest of PS19a, which is under separate ownership. The Parish Council is of the view that this means Stagholt Farm will benefit from being masterplanned as a separate component of the overall strategic allocation, something the Parish Council views is best achieved by allocation through the Neighbourhood Plan.

4.23 In this context, the proposed allocation of Stagholt Farm is underpinned by seeking to rationalise and make best use of available land rather than to meet an identified local housing need.

⁵ <https://www.stroud.gov.uk/media/1070855/sli007-sto024.pdf>

Figure 4.3: Stagholt Farm in the context of adjacent strategic allocations



Reasonable alternatives discussion

- 4.24 A key element of the SEA process is establishing and appraising 'reasonable alternatives' for the Neighbourhood Plan. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the "*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*".⁶
- 4.25 However, it is apparent that the Parish Council is very limited in terms of potential alternatives to the draft plan that can be considered.
- 4.26 This is due to the specific circumstances of the proposed site allocation at Stagholt Farm in terms of the reason for its nomination by the landowner, its spatial relationship with adjacent strategic allocations and its potential to deliver the objectives of the Neighbourhood Plan.

Alternative site options

- 4.27 No alternative site options have been identified for potential allocation through the Neighbourhood Plan. Fundamentally, this reflects the key fact that the allocation of Stagholt Farm is not driven by the need to meet a housing target, but rather to rationalise available land to enable a coherent strategic scheme which reflects the landowner's wishes.
- 4.28 The absence of a housing target and the absence of evidence of local housing need within Standish – plus the general presumption against development in Tier 5 settlements in the Local Plan - means that there is no need for the Parish Council to undertake a call for sites to explore potential locations for growth within Standish. This highlights the fact that Stagholt Farm is additionally unique in the context of the plan area as having potential to function as a part of the Stonehouse urban area, i.e. a Tier 1 settlement rather than any of the Tier 5 settlements elsewhere in the parish.

Alternative spatial strategy options

- 4.29 In the absence of a housing target or evidence of local housing need, and on the understanding that allocation of Stagholt Farm is proposed to achieve a specific and unique purpose in the context of the plan area, it is not possible to derive meaningful spatial strategy alternatives to the draft Neighbourhood Plan. A 'do nothing' scenario is not a reasonable alternative to test, as this is the existing baseline without a plan.
- 4.30 On this basis, it is considered that **there are no reasonable alternatives** to the preferred spatial strategy for the Standish Neighbourhood Plan.

⁶ Environmental Assessment of Plans and Programmes Regulations 2004, available at: http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf

5. What are the appraisal findings at this current stage?

Introduction

5.1 This part of the report presents an assessment of the submission version of the Standish Neighbourhood Plan. This submission version of the Neighbourhood Plan incorporates suggested amendments identified through an appraisal of earlier drafts of the plan. A schedule of these proposed amendments and how they have been addressed is presented at the end of this chapter.

Assessment method

5.2 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.

5.3 For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.⁷ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

5.4 Every effort is made to identify and evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Standish Neighbourhood Plan policies

5.5 The submission draft of the Neighbourhood Plan contains four policies, including the proposed site allocation policy. These are summarised in **Table 5.1** overleaf.

5.6 The policies are then assessed under six headings, one for each of the SEA themes identified through the scoping process.

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

Table 5.1 Proposed policies in the submission version of the Standish Neighbourhood Plan

Policy number	Policy name
S1 (A-G)	Standish Development Framework
S2 (A-K)	Major Development in South Standish
S3	Sustainable Transport
S4	Stagholt Farm (<i>site allocation</i>)

Biodiversity

- 5.8 Standish is not notably constrained in relation to designated biodiversity sites within the Neighbourhood Plan area itself, though it does have some secondary sensitivity in relation to the nearby Severn Estuary, which is subject to multiple designations at national and international scale.
- 5.9 The Severn Estuary is designated as a Ramsar site, Special Protection Area (SPA) and Special Area of Conservation (SAC), as well as a Site of Special Scientific Interest (SSSI). However, it is considered that the proposals and policies of the Neighbourhood Plan are unlikely to give rise to significant effects in relation to the Severn Estuary.
- 5.10 However, it is noted that proposed site allocation at Stagholt Farm is located within a SSSI Impact Risk Zone (IRZ) for any residential developments with a net gain in units. It is not clear specifically which SSSI this IRZ relates to (or whether it relates to more than one SSSI), but it is important to identify that there will consequently be a duty for Natural England to be consulted on proposals for the site at the planning application stage, or through engagement with Natural England at the pre-application stage.
- 5.11 It is recognised that there could be some theoretical potential for cumulative effects on the Severn Estuary from development proposed through **Policy S4** (Stagholt Farm) and strategic development proposed through the emerging LPR, particularly in light of the SSSI IRZ discussed above. However, development specifically proposed through the Neighbourhood Plan is equivalent to only around 4% of the scale of growth proposed through the LPR at site PS19a, suggesting that in-combination effects from development at both sites coming forward together would likely be negligible.
- 5.12 **Policy S2** (Major Development in South Standish) establishes detailed requirements for development at LPR proposed site PS19a. The policy recognises the need to minimise and mitigate harm to existing habitats, whilst also seeking to maximise the opportunity to deliver biodiversity enhancements. Specifically, **S2.C** requires development proposals at the strategic site to be accompanied by a 'Countryside and Wildlife Plan', the purpose of which includes "introducing wildlife corridors", improving "wildlife habitats" and providing a "range of habitats" through enhancements to existing water bodies on site.

- 5.13 Additionally, **S2.J** requires strategic proposals to also be accompanied by a 'Landscape and Habitat Management Plan' (LHMP), which should detail measures that will be undertaken to "*conserve and enhance biodiversity*" at a landscape scale.
- 5.14 Elsewhere, the plan is proactive in seeking enhancements to biodiversity through the development process. **Policy S1** (Standish Development Framework) requires new development proposals to "*generate a biodiversity net gain*", though it is not immediately clear if this requirement also applies to small scale development, such as replacement dwellings, as well as major development proposals in line with the emerging requirement for biodiversity net gain at the national level.
- 5.15 Additionally, **Policy S3** (Sustainable Transport) also recognises the potential for new development to deliver biodiversity enhancements, stating that any enhancements to transport infrastructure secured through strategic development in the parish should include provision of "*wildlife corridors which link the adjacent countryside*". This is likely to contribute positively towards the protection and enhancement of existing habitat networks which traverse the Neighbourhood Plan area.
- 5.16 Overall, **minor long term positive effects** are anticipated in relation to the biodiversity theme on the basis that there is minimal sensitivity within the plan area at present, and long term commitment to seek enhancement through development.

Climate change

- 5.17 The key considerations in relation to climate change are the need to support resilience to the potential effects of climate change, including increased flood risk, whilst also minimising contributions to climate change made by activities within the Neighbourhood Plan area.
- 5.18 In this regard, **Policy S1** (Standish Development Framework) performs well. Paragraph 1.7 establishes a presumption against development proposals which come forward on "*land subject to flooding*". The policy underscores an NPPF presumption against residential development fluvial flood zone 3, i.e. the highest area of flood risk. Additionally, **S1** requires development proposals to mitigate any residual flood risk, presumed to be surface water flood risk, "*by use of effective water management regimes using SuDS*" to help "*avoid flooding*".
- 5.19 It is noted that the south west corner of the proposed site allocation at Stagholt Farm, as per **Policy S4**, is within an area of flood zone 2 and 3. However, as this area of the site is not proposed for development it is considered that there is no risk in practice.
- 5.20 The plan also includes measures aimed at adapting to other elements of a warming climate, including maximising "*passive cooling through natural ventilation*" and designing-in opportunities for "*seasonal cooling/heating*" to new development at proposed site PS19a (as per **Policy S2.F**).

- 5.21 With regard to minimising contributions to climate change, **Policy S2** (Major Development in South Standish) looks to embed low carbon concepts within new development with a view to minimising emissions from both the built environment and from transport. In terms of built environment emissions, **S2.E** states that development proposals should be accompanied by a ‘sustainability statement’ which demonstrates how the *“potential for carbon reduction has been maximised, exceeding current Building Regulations Standards where possible”*.
- 5.22 Additionally, **S2.F** requires preparation of an ‘energy strategy’ at PS19a to demonstrate that development will minimise energy demand through energy efficiency measures, maximise opportunities for on-site renewable energy generation, including solar gain, and participate in a carbon offsetting regime.
- 5.23 In terms of minimising contributions from transport sources, the Neighbourhood Plan promotes the delivery of new and enhanced sustainable transport infrastructure through the development process to minimise car dependency where practical and enable many needs to be met via modes of transport with low or no emissions.
- 5.24 It is considered that the Neighbourhood Plan proposes detailed and ambitious measures to ensure that contributions to climate change are minimised from strategic development brought forward through the Local Plan within the Neighbourhood Plan area. **Minor long term positive effects** are anticipated as a result.

Community vitality

- 5.25 Significant new community infrastructure is sought through strategic development at proposed site PS19a. **Policy S2** (Major Development in South Standish) weaves meeting existing and future residents’ needs into the policy requirements for strategic development. The policy states that a *“Community Infrastructure Access Study”* should accompany development proposals, setting out *“how community infrastructure needs will be met and how all members of the Standish community will have equal transport and social access to new community infrastructure”*.
- 5.26 **S2.B** recognises that strategic development within the parish has potential to provide significant new community infrastructure, whilst also recognising that it will be important to ensure that the existing residents of Standish are able to access such infrastructure. Therefore the requirement that development proposals are informed by an assessment of *“access by car and sustainable transport, access by age and level of mobility”* and of *“barriers to access”* is positive, as it will help identify and implement access strategies for existing residents.
- 5.27 There are a number of references to leveraging strategic development’s potential to enhance sustainable transport options in Standish. **Policy S2.D** requires an accompanying Transport Assessment to *“identify safe commuter and leisure pedestrian, cycling and multi-user routes to Stonehouse and towards Gloucester”*, whilst **Policy S3** (Sustainable Transport) establishes that

“Strategic Development will provide safe and pleasant sustainable transport routes”.

- 5.28 A separate Sustainable Transport Evidence Paper forms part of the Neighbourhood Plan’s evidence base and identifies a number of public rights of way (PRoWs) at which **Policy S3** requires a “*reasonable contribution*” to be achieved via contributions from strategic development. Additionally, specific enhancements are sought for new cycleway infrastructure which will link key locations within the parish via a “*multi-user*” path in order to ensure connectivity between existing settlements in Standish and new facilities at the strategic development site. This is supported by a separated feasibility study.
- 5.29 At the proposed site allocation, **Policy S4** (Stagholt Farm) seeks delivery of “*small B-class uses*” via redevelopment of the existing farm outbuildings, along with “*small-scale tourism and lodging*”. This will help retain and deliver a small degree of local employment within the parish. This is considered positive in principle in terms of catering for a range of community needs within the parish.
- 5.30 Overall, the Neighbourhood Plan is anticipated to give rise to **minor long term positive effects** in relation to community vitality.

Historic environment

- 5.31 The Neighbourhood Plan area as a whole has limited sensitivity in relation to designated historic assets and none of the parish’s settlements has a conservation area. However, a cluster of listed buildings, including Grade II* and Grade I listings, is evident at Standish village indicating localised sensitivity, and a wide dispersal of individual or isolated listed buildings is evident across the parish more generally.
- 5.32 In this context, **Policy S1** (Standish Development Framework) is found to perform well, stating that support in principle will only be extended to development which “*preserves, protects and enhances listed buildings and their landscape setting*”, recognising that in many instances the parish’s listed buildings are set against a rural landscape backdrop which contributes to their character.
- 5.33 Development allocated by the Neighbourhood Plan through **Policy S4** (Stagholt Farm) is unlikely to have any notable historic environment sensitivity as there are no designated historic assets within or adjacent to the site, and the site does not support views to or from the cluster of listed buildings at Standish village.
- 5.34 Similarly, strategic development proposed at PS19a is also distant from the parish’s designated historic assets and is unlikely to have potential for direct effects in relation to the historic environment. There are no listed buildings within or adjacent to the site and the site will come forward in the context of significant contemporary development on the adjacent West of Stonehouse strategic site which is currently being built out. There appears to be little prevailing historic character in the immediate vicinity of the site to seek mitigation in relation to.

5.35 However, there could be some potential for development at PS19a to urbanise the landscape backdrop for the parish’s settlements, including their historic assets. Correspondingly, there could be some indirect potential for harm to the intrinsic historic character of those listed buildings with long views over proposed site PS19a. However, **Policy S2** (Major Development in South Standish) seeks to ensure that adverse effects on long views into and out of PS19a are minimised. **S2.H** points to the Standish Landscape Assessment which notes the need for substantial boundary treatment around PS19a to minimise the urbanising effect on long views. In turn, this may help minimise effects on the landscape setting of the parish’s historic assets.

5.36 Overall, the Neighbourhood Plan is considered likely to give rise to **neutral effects** in relation to the historic environment.

Landscape

5.37 The parish lies at the western extent of the Cotswolds escarpment and much of the elevated eastern half of the parish falls within the Cotswolds Area of Outstanding Natural Beauty (AONB), whilst its western half is relatively flat and lies much lower in the landscape within the Severn Vale. High ground in the east supports long range scenic views over the Vale from a number of viewpoints. This gives rise to potential landscape sensitivity in much of the plan area, either directly in relation to the AONB in the east, or indirectly in relation to the setting of the AONB in the west. Correspondingly, the Neighbourhood Plan seeks to ensure that the parish’s landscape quality is protected, supported by a detailed evidence base which informs the subdivision of the parish into seven landscape ‘character areas’, as per **Table 5.2** below:

Table 5.2 Summary of landscape ‘character areas’ as per Table 1 of the SNP

Area	Area description	Development stance
Area A	Cotswolds AONB	Development not normally appropriate
Area B	Outside the AONB but important feature of its setting	Development should be strongly resisted
Area C	North of PS19a	Development only appropriate where supported by a landscape assessment
Area D	South of Standish village	Development not normally appropriate
Area E	Open countryside	Only rural development appropriate
Area F	Standish village	Development appropriate only where historic environment is protected.
Area G	Strategic development site PS19a	Development should be consistent with requirements of SNP Policy S2

- 5.38 First, in relation to the AONB, paragraph 1 of **Policy S1** (Standish Development Framework) underscores the presumption established in the Local Plan against most forms of development in the AONB or its setting, stating that *“development in the AONB and within the AONB’s setting will normally be inappropriate”*.
- 5.39 This is considered positive in principle as it will continue to be of great importance to avoid harm to the AONB and its setting. The policy seeks to add detail to the Local Plan by defining seven landscape ‘character areas’ in the parish. Of these, ‘Area B’ – a wedge of land between the B4008 and the Bristol-Birmingham railway line, with the railway marking its western extent - is identified as being particularly sensitive within the AONB setting.
- 5.40 This reflects the importance the Cotswold AONB Management Board (CAMB) attaches to AONB setting, outlined below:
- “The Board considers the setting of the Cotswolds AONB to be **the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB**”*.⁸
- 5.41 It is considered that the approach taken in **Policy S1** of defining landscape character areas within the parish is sensible and proportionate as a means of guiding development.
- 5.42 Turning to strategic development proposed in the parish, the 2019 Standish Landscape Appraisal finds that both the existing and proposed strategic allocations at the south of the Neighbourhood Plan area are *“highly visible from a number of viewpoints”* and that the visual effect of strategic development will likely be *“significantly adverse where extensive or clear views can be seen”*. With reference specifically to proposed site PS19a – which is entirely within the Neighbourhood Plan area – the Landscape Appraisal notes that landscape effects could be significantly adverse without substantial mitigation through boundary treatment, such as *“large scale forest trees along the boundary zones and within the internal layout”*.
- 5.43 In response to this evidence, **Policy S1** defines the extent of proposed site PS19a as character area ‘G’, and signposts to **Policy S2** (Major Development in South Standish) for more detail.
- 5.44 **Policy S2.H** requires development proposals which come forward at PS19a to be accompanied by a Landscape Visual Impact Assessment (LVIA) to *“ensure that harmful impact upon views to and from the AONB are minimised”*, using the Standish Landscape Assessment findings as a *“starting point”*. It is considered that this requirement is proportionate in light of the findings of the Standish Landscape Assessment in relation to potential landscape impacts from strategic development and potential mitigation options.
- 5.45 Similarly, **Policy S4** (Stagholt Farm) reflects the findings of the Standish Landscape Assessment through its requirement that development proposals

⁸ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>. Emphasis added by AECOM.

ensure “*retention and improvement of existing trees and hedgerows on the site*” in order to minimise the landscape impact of development. Additionally, landscape effects from the allocation of Stagholt Farm must be seen in the context of wider effects from the adjacent strategic site allocation. Landscape effects from Stagholt Farm are likely to be negligible given the urbanising effect of the adjacent strategic site.

- 5.46 Overall, **minor long term positive effects** are anticipated in relation to the landscape theme. This is on the basis that mitigation is sought in relation to likely adverse effects from strategic development at PS19a, whilst detailed parameters on the kinds of development which will be supported elsewhere in the parish are clearly defined.

Natural resources

- 5.47 There is a need to ensure that development makes best use of available land, i.e. avoids resulting in the avoidable loss of ‘best and most versatile’ (BMV) agricultural land where poorer quality land is available as an alternative. The agricultural land classification identifies Grade 1, 2 and 3a as BMV land, whilst Grades 3b, 4 and below are of poorer quality. **Policy S4** (Stagholt Farm) allocates land which is not in productive agricultural use, and so does not give rise to negative effects in this respect.
- 5.48 Looking more broadly at the surrounding strategic development site, detailed survey work indicates that much of proposed site PS19a is underlain by Grade 3b land, meaning development would not result in the loss of BMV land. The Neighbourhood Plan policies are silent on the loss of BMV land, though as neither the Stagholt Farm allocation or the wider strategic allocation appear likely to have adverse effects on BMV land this is considered proportionate.
- 5.49 There is also a need to ensure that water resources and water quality are not adversely affected by development. **Policy S2** (Major Development in South Standish) looks to ensure water bodies which flow through or adjacent to the strategic development at proposed site PS19a are enhanced, with **S2.C** stating that development should “*preserve ... existing water features*” and improve their quality as habitats – this suggests the overall quality of waterbodies will be enhanced accordingly.
- 5.50 Overall, the Neighbourhood Plan is anticipated to have an **overall neutral effect** in relation to the natural resources SEA theme.

Conclusions

- 5.51 Overall, the assessment finds that the policies and proposals of the Neighbourhood Plan are likely to give rise to **minor long term positive effects** in relation to the Biodiversity, Climate Change, Community Vitality and Landscape SEA themes.
- 5.52 **Neutral effects** are anticipated in relation to the Historic Environment and Natural Resources SEA themes.
- 5.53 Significant negative effects are not anticipated in relation to any SEA theme.

Cumulative effects

5.54 It is recognised that allocation of Stagholt Farm through the Neighbourhood Plan will be contingent on proposed site PS19a being allocated in the LPR, once adopted. Effects from development at Stagholt Farm will necessarily form part of wider effects from the much larger strategic development of PS19a. In this sense, cumulative effects from Stagholt Farm are inevitable, though in practice the small scale of the allocation relative to the scale of PS19a (i.e. 24 dwellings out of around 650 dwellings in total) means that effects from Stagholt Farm are unlikely to add any meaningful significance to effects from the wider PS19a development. Cumulative effects are considered likely to be negligible.

Recommendations

5.55 The iterative nature of plan making and SEA has given rise to opportunities for the SEA to appraise earlier versions of the plan and make recommendations accordingly. This is a key function of the SEA, i.e. reflects the need for SEA to 'inform and influence' the plan making process. Consequently, the submission version of the plan incorporates a number of amendments recommended by the SEA. For clarity, and to ensure the influence of the SEA on the plan making process is evidenced in a clear and accessible manner, these recommendations are set out in Table 5.3 below:

Table 5.3 List of recommended amendments which have been incorporated into the submission version of the Neighbourhood Plan

Policy	Recommended action	Outcome
S1 (Standish Development Framework)	It is recommended that in order to avoid confusion and maximise the effect of the plan's policies, landscape character area 'B' be amended so that it no longer seeks to spatially define the extent of the AONB setting as this has an established broader understanding which may conflict with the tighter definition sought by the Neighbourhood Plan. This amendment could likely be as minor as re-naming the character area.	Policy amended accordingly by renaming landscape character area B.
S4 (Stagholt Farm)	On a point of detail it is recommended that the policy wording be updated to reflect amendments to the Use Class Order in 2020 which combined several use classes – including the former Class B – into a new Class E. ⁹	Policy amended accordingly.
Plan-wide	On a general point, it is recommended that the Parish Council consider aligning the plan period of the Neighbourhood Plan with that of the emerging Stroud Local Plan Review. Currently, the Neighbourhood Plan is proposed to have a plan period to 2036, whilst the LPR will have a plan period to 2040. Footnote 16	Plan period amended accordingly.

⁹ <https://www.legislation.gov.uk/uksi/2020/757/made>

of the NPPF requires Neighbourhood Plans to be “*in general conformity with the strategic policies contained in any development plan that covers their area*” and it might help future-proof the plan to align with the emerging LPR period in its entirety.

6. What are the next steps?

Submission

- 6.1 This Environmental Report accompanies the submission version of the Standish Neighbourhood Plan for submission to the Local Planning Authority, Stroud District Council, (SDC) for subsequent Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted Stroud District Plan and emerging Local Plan Review.
- 6.3 If Independent Examination is favourable, the Standish Neighbourhood Plan will be subject to a referendum, organised by CDC. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be ‘made’. Once made, the Standish Neighbourhood Plan will become part of the Development Plan for Stroud district, covering the defined Neighbourhood Plan area.

Monitoring

- 6.4 The SEA regulations require ‘measures envisaged concerning monitoring’ to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 6.5 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by SDC as part of wider monitoring associated with the Local Plan, via preparation of an Annual Monitoring Report (AMR).
- 6.6 The SEA has not identified any potential for significant negative effects that would require closer monitoring.

Appendix I Regulation requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AI.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AI.2 explains this interpretation.

Table AI.1: Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the Environmental Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SEA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1		What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2		What are the SEA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3		What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table A1.2: Questions answered by this Environmental Report, in-line with regulatory requirement

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Appendix II The scope of the SEA

Scoping consultation responses

A summary of representations to the statutory SEA Scoping Report consultation, along with how they have been considered is presented in Table All below:

Table All Summary of representations received to the SEA scoping consultation

Consultee	Consultation response summary	How the response is considered and addressed
Historic England	<ul style="list-style-type: none"> <i>n/a - no representation received within the consultation period.</i> 	n/a
Natural England	<ul style="list-style-type: none"> <i>n/a - no representation received within the consultation period.</i> 	n/a
Environment Agency	<ol style="list-style-type: none"> Recommendations provided in response to the Reg 14 consultation in July 2020 still apply; South west corner of the proposed site allocation at Stagholt Farm appears to be within Flood Zone 2 and 3 (medium and high risk); Could be some potential for flooding from 'ordinary watercourses' which are not included within the EA's flood mapping; It is recommended the SEA considers the potential for biodiversity enhancement and net gain. 	<ol style="list-style-type: none"> Noted – no action required. This has been considered through the appraisal of the draft plan. Noted – no action required as no specific potential for effects identified. This has been captured in the appraisal of the draft plan.

Context and baseline review

Drawing on the review of the sustainability context and baseline, the Scoping Report process identified a range of sustainability issues that should be focus of SEA. These key baseline issues and opportunities are presented below under six environmental themes.

Biodiversity

- There are no internationally or nationally designated sites within the Plan area
- This means there are no Sites of Special Scientific Interest within the Plan area, though the Plan area does fall within a number of SSSI Impact Risk

Zones (IRZs) suggesting a degree of sensitivity from some forms of development.

- There are a number of sites recognised for their important potential to support domestic habitats and species and their wider habitat networks within the Plan area, including various woodlands, orchards, grassland and network expansion zones.
- Due to limited areas of notable biodiversity significance within the plan area, the Neighbourhood Plan has the potential to enhance/deliver net gain through the process of delivering development.

Climate change

- Areas of high fluvial and surface water flood risk in the Plan area are very limited and mostly confined to the corridor of the Epney Rhyne, which runs through the centre of Standish village.
- Following Stroud District Council's declaration of a climate emergency, the Neighbourhood Plan is being prepared in the context of a District-wide target of carbon neutrality by 2050.
- Government emissions data (2018) indicates that CO₂ emissions in Stroud District are falling, but still lower than comparative figures for the South West region.
- The transport sector continues to be the largest contributing sector towards CO₂ emissions in Stroud District. There are several electric vehicle (EV) charging points located in nearby Stonehouse, though none in Standish itself.
- Green Infrastructure in the Plan area includes Standish Park and Wood, located in the west part of Standish. The Plan should seek to preserve GI networks and open spaces such as Standish Park and Wood.

Community vitality

- The population of the Plan area is small, at around 260 people in 2019. Evidence from census data and mid-year population estimates indicates the population may be gradually declining. However, since this data was compiled, there have been 26 housing completions within the parish, providing a recent increase to the population. Further completions are anticipated at a housing site at the former Standish Hospital which will further reverse the trend for a declining population.
- The 60+ age bracket is the largest within the Plan area, significantly greater than proportion for Stroud, the South West region and England as a whole. This may be partly due to the presence of the Moreton Hill Care Home within the parish, whose elderly residents form a sizable proportion of the total population of the parish.
- Census data indicates that an overall majority of residents in the Plan report good or very good health, though a significant minority report 'very bad' health. This could reflect the age profile of the parish, as a large proportion of residents are aged 60 or over.

- A large proportion of residents in the Plan area own their own cars in comparison to the District, region and national as a whole. In particular, a large majority of residents own multiple cars. Future development could offer the potential to support improved connectivity with higher tier services outside the parish, particularly at Stonehouse.

Historic environment

- There are 46 listed buildings within the Plan area, including one Grade I listed building, two Grade II* listed buildings and 42 Grade II listed buildings. Additionally, there are four scheduled monuments within the Plan area. Development within the plan area requires the preservation and maintenance of these assets and their settings, subject to detailed matters of design and layout.

Landscape

- The eastern half of the Neighbourhood Plan area falls within the Cotswold AONB, indicating significant landscape sensitivity, including at areas of the parish outside the AONB itself but which are likely to be within its setting.
- There are a number of viewpoints from high ground within the parish which offer distinctive panoramic views over the Severn Vale.
- Standish generally retains a strong rural character with small-scale scattered settlements across the Parish that are well integrated within the local landscape (Standish Parish Council).

Natural resources

- There are two key watercourses within the Plan area. None of the water bodies within the Plan boundary meet the requirements for 'good' chemical status due to the presence of mercury and its compounds and Polybrominated diphenyl ethers (PBDE).
- The Plan area is underlain by Grade 3 agricultural land which could mean it has potential to be 'best and most versatile' land.
- The Plan area falls partly within two Mineral Safeguarding Areas (MSAs), though there are not currently any mineral extraction sites in the Plan area.