

Submission Draft

**Standish Neighbourhood
Development Plan 2040**

**Stagholt Farm Site
Allocation**

Evidence paper

October 2021

**Standish
Parish
Council**



Introduction

1. The purpose of this Evidence Paper is to justify the conditional site allocation of Stagholt Farm in the Standish Neighbourhood Development Plan (the NDP). The allocation is for up to 24 dwellings, redevelopment of existing farm buildings as small E-class uses, self-build residential accommodation, small-scale tourism and lodging, , PROW improvements and access via Strategic Allocation PS19a/South Standish, should that be proposed as an allocation in the Stroud Local Plan 2040.

Justification for the site allocation

2. The Evidence Paper on Planning Policy Context discusses the strategic planning context for the NDP and the allocation of PS19a/South Standish.
3. The Stroud District Local Plan covers a plan period to 2031 and was adopted in November 2015.
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.
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
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.
7. The Regulation 19 Stroud Local Plan identifies a need for 700 houses in Standish Parish north of Stonehouse allocation SA2/Great Oldbury.
8. The NDP was prepared in the context of the Stroud District Local Plan Review Emerging Strategy Paper (November 2018) which excluded the site referred to here as “Stagholt Farm” as an “island” of unallocated land between allocated site SA2 and proposed site PS19a/South Standish. This was because the landowner had not put Stagholt Farm forward in the call for sites in 2018.
9. To address the 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, after which it was assigned a SLAA site number of STO021.

10. 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 SA”.

11. The landowner’s agent stated in letters to the local planning authority and the Parish Council’s planning consultant dated 8 April 2019, that the site should be included in the Local Plan Review as part of the allocation for PS19a/South Standish. However, in an email dated 9 April 2019 from the landowner’s agent to the Parish Council’s planning consultant, it was stated that the landowner wished the site to be allocated in the NDP.
12. On 18 April 2021, the landowner wrote to the Local Planning Authority withdrawing Stagholt Farm from consideration as part of a strategic housing land allocation in the Emerging Local Plan. He stated that he wished instead for this site to be allocated in the Standish Neighbourhood Development Plan.
13. PS19a is believed by the Parish Council to be under three separate ownerships: a private owner who has engaged Pegasus Planning and Robert Hitchins as site promoters and developers (the majority of the site), Gloucestershire County Council, and the private owner of Stagholt Farm. The overall PS19a masterplan proposals presume that the entire site will be addressed as a single entity. However, this does not recognise the complexity introduced by the three separate ownerships. In particular, the owner of Stagholt Farm has not engaged fully in the site allocation process and is not working with the two other land owners in seeking to produce a unified scheme for PS19a. The matter of the separate ownerships and the fact that the neighbouring landowners (Hitchins and Stagholt Farm) were not cooperating, indicated that it remains appropriate for the Stagholt Farm allocation to progress in the NDP.
14. Although Stagholt Farm has long been in the open countryside, the collective effect of allocated site SA2 in the adopted Local Plan and proposed site PS19a in the LPR is the encirclement of the site by strategic allocations, as illustrated in Figure 4.3, overleaf. The effect of the separate land ownerships means that the site will be required to be masterplanned as a separate component of the overall strategic allocation.

Stagholt Farm

15. The landowner has lived at Stagholt Farm for many years and has raised his family there and run his business. During that time, he has made many environmental improvements, particularly to the land around a brook to the southern boundary of the site.
16. The site has road access over Black Bridge which crosses the railway line. This is a special arrangement between the landowner and British Rail that would not necessarily be extended to other

landowners. Black Bridge is a single track bridge that would be unlikely to be able to support high levels of traffic in its current condition. There is no other vehicular access to Stagholt Farm.

17. Vehicular access to the site was previously over a single track route in the south east corner, via a level crossing. When Network Rail closed the crossing to motorised vehicles, the arrangement described at paragraph 17 above was negotiated.
18. The farm is relatively flat, though slightly sloping to the south and east.
19. A brook approximately marks the southern boundary of the site. There is a finger of land to the south east, where the track referred to in paragraph 17 is situated. This area runs up to the railway line, giving access to a public right of way which crosses under the railway line. The main farmhouse buildings are located in the western portion of the site, indicated in yellow shading on the map. Scattered buildings for agricultural and B class uses are located to the north of the site. The entire site is surrounded by mature hedges with interspersed mature trees.
20. The site is shown on an OS base in **Figure 1** and as an air photo in **Figure 2**.
21. The landowner has confirmed that he wishes Stagholt Farm to be allocated in the Standish Neighbourhood Development Plan.

Figure 1: Stagholt Farm boundary



23. A note about the site plan: The site boundary submitted by the land owner's agent for allocation in the Local Plan and NDP did not include the south eastern access track (shown in heavier red line). This track has been included in the NDP policy.

Figure 2: Air photo of Stagholt Farm



Source: Google Maps, 21 July 2019

Methodology

24. The National Planning Policy Framework (NPPF 2021) Appendix 2 indicates that to be considered “deliverable”, sites should be

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular: a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

25. The “Site Assessment for Neighbourhood Plans Toolkit”¹ states that allocated sites must be: *suitable, available, and achievable.*

A site is suitable if there are no insurmountable physical or environmental factors which would restrict development, or it has received planning permission.

A site is available if there is evidence that a landowner or developer is willing to sell or develop the site at a known point in the future, and within the plan period.

A site is achievable if there is evidence that it is economically viable and there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time.

26. Normally, a site allocation in a neighbourhood plan would require a call for sites, other activities to ensure that all available sites had been considered, and then a robust assessment of each site relative to the others to determine the best options.
27. However, in this instance, the purpose for allocating the site is to include Stagholt Farm within the larger allocation in the emerging Local Plan (2019) for PS19a/South Standish.
28. Stagholt Farm is adjacent to a strategic allocation SO2/Great Oldbury. Under the adopted Local Plan policies, the site is within the countryside and outside the Settlement Hierarchy, along with the

¹“Site Assessment for Neighbourhood Plans: A toolkit for neighbourhood planners”, Locality, 2015, pages 11-14.

remainder of Standish Parish where most development not related to agriculture would not be appropriate.

29. However, the Presubmission Draft Local Plan (May 2021) proposes land to be allocated for housing and employment at PS19a/South Standish. Should this allocation be forthcoming, it would render Stagholt Farm an “island” between the strategic allocations, leaving the farm landlocked between the major sites.
30. **Therefore, this site allocation will help meet the need for 700 new homes in Standish Parish identified in the emerging Local Plan and regularise the position of Stagholt Farm in relation to site PS19a/South Standish. In this regard, the allocation is “conditional” because it would only be activated where PS19a/South Standish became an allocation in the adopted Local Plan.**
31. The methodology used in this site allocation will therefore proceed directly to an assessment of the deliverability of the site in terms of its suitability, availability and achievability.
32. Suitability will be demonstrated by a consideration of:
 - Compliance with the policies in the Development Plan
 - Constraints and mitigation
 - Number of dwellings and other land uses
33. Availability will not be considered further because the landowner has confirmed to the Parish Council his wish to have the land allocated in the Standish NDP in his email of 9 April 2019. This intention was re-confirmed in his letter to the LPA of 18 April 2021.
34. Achievability will also not be considered further because there is a demonstrated need for additional housing in Stroud District, as set out in the evidence in support of the Draft Local Plan which has identified a need for an additional 650 homes in Standish Parish.

Compliance with the policies in the Development Plan

35. Standish Parish is rural and does not feature in the Stroud Settlement Hierarchy (Policy CP3). Stonehouse is identified as First Tier Settlement. Should PS19a/South Standish come forward as a Strategic Allocation, it would functionally become part of Stonehouse (whilst in practice remaining part of Standish Parish) and would presumably adopt Tier 1 Status. This argument would also apply to Stagholt Farm should this conditional allocation be triggered. It is therefore capable of being in conformity with this policy.
36. Core Policy CP14 requires development proposals to accord with mini-visions for each locality. As stated in the previous paragraph, should Stagholt Farm come forward following allocation of PS19a/South Standish, it would become part of the Standish Vision, being affected by policies in the Standish NDP. It is therefore capable of being in conformity with this policy.

37. Core Policy CP5 requires Strategic sites to be appropriately designed and built. The Standish NDP will have a significant influence on how this policy will be interpreted should PS19a/South Standish be allocated and it will be important for Stagholt Farm to also be included in these considerations.
38. Core policy CP9 would require Stagholt Farm to provide 30% affordable housing.
39. Delivery Policy HC3 requires strategic allocations to make provision for self-build housing. This could easily be accommodated in the area where the existing farm and business buildings are located to the north of Stagholt Farm site.
40. Core Policy CP13 supports major schemes that make provision for sustainable transport and the site can be linked to the PROW which are discussed in other policies in the NDP.
41. Delivery Policy EI10 allows small scale tourist attractions and accommodation that are compatible with wider landscape and biodiversity interest. Land at Stagholt Farm might be suitable for very small scale tourism-related activity, such as small holiday lets.
42. Delivery Policy requires new development to connect to the surrounding infrastructure. Since Stagholt Farm is only accessible via Black Bridge which is itself not suitable for traffic, new access will be required through either PS19a/South Standish or SO2/Great Oldbury.
43. Delivery Policy EI13 requires major development to provide new cycle routes within and connecting to the existing network.
44. Delivery Policy ES4 states that for developments in areas with known surface water flooding issues, appropriate mitigation and construction methods will be required.
45. Delivery Policy ES6 requires all new development will be required to conserve and enhance the natural environment. Other policies in the NDP meet these requirements and will be applied to Stagholt Farm should it become an allocation. The site is therefore capable of being in conformity with this policy.
46. Delivery Policy ES7 requires development to conserve or enhance the special features and diversity of the different landscape character types and to retain and manage natural features such as tress, hedgerows and water features. The Standish NDP group has completed an environmental survey of Stagholt Farm, attached as **Appendix 1**. The survey demonstrates the value and biodiversity of hedgerows on the site. These will require protection under ES7. **The Standish Parish Landscape Appraisal** is used as a consideration regarding landscape mitigation.
47. Delivery Policy ES8 flows from ES7 and requires development to enhance and expand the District's tree and woodland resource.

48. Delivery Policy ES14 sets out green space standards for new development. All strategic scale residential development will be expected to have a network of such spaces. Provision from Stagholt Farm will need to be integrated with the assessment and design of green infrastructure with PS19a.
49. Stagholt Farm lies outside the Emerging Minerals Local Plan safeguarding area and is not mentioned in the Waste Core Strategy.

Constraints and mitigation

Flooding

50. Stagholt Farm lies partially in Flood Zone 3 (shown in **Figure 3**). It will therefore be necessary to manage flood risks or to avoid them by preventing development from affecting the existing natural drainage systems on the site. It is therefore capable of being in conformity with policy ES4. However, to do this, it will be necessary to retain a buffer of land around the brook and outside areas subject to flooding to retain the natural drainage functions of this site.

Figure 3: Flood Zone 3 in Standish and Stagholt Farm



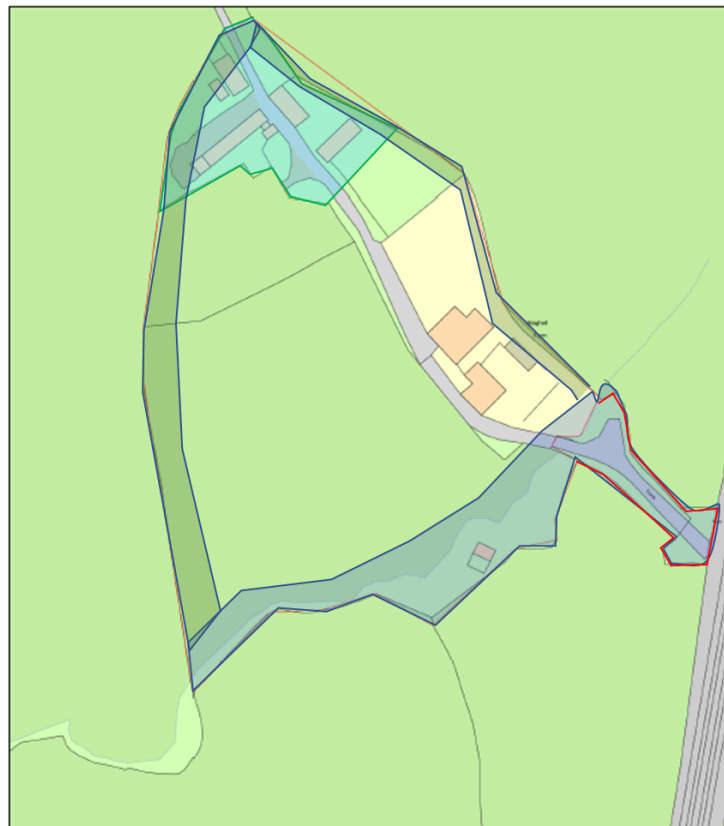
Trees, hedges and biodiversity

51. The existing trees and hedges, and planting along the brook, should be protected from development. The Standish Landscape Assessment has highlighted the importance of retaining existing tree screen cover and enhancing it where necessary, to preserve the setting of the AONB.

Transport

52. Transport access can only be accommodated via PS19a/South Standish and SO2/Great Oldbury. Connections to the PROW with appropriate improvements will be necessary.
53. The main constraints affecting housing delivery are shown graphically in **Figure 4**. The light blue shading to the north shows existing buildings that may be suitable for redevelopment. The yellow area shows the domestic curtilage of Stagholt Farm. The dark green shading shows the approximate location of valuable hedges and trees that will be required to be protected. The blue shading to the south shows the area liable to flooding including a buffer to protect trees and local biodiversity. Grey shading shows existing transport routes that lead to Black Bridge which may become redundant depending on how the site is developed.

Figure 4: Main development constraints



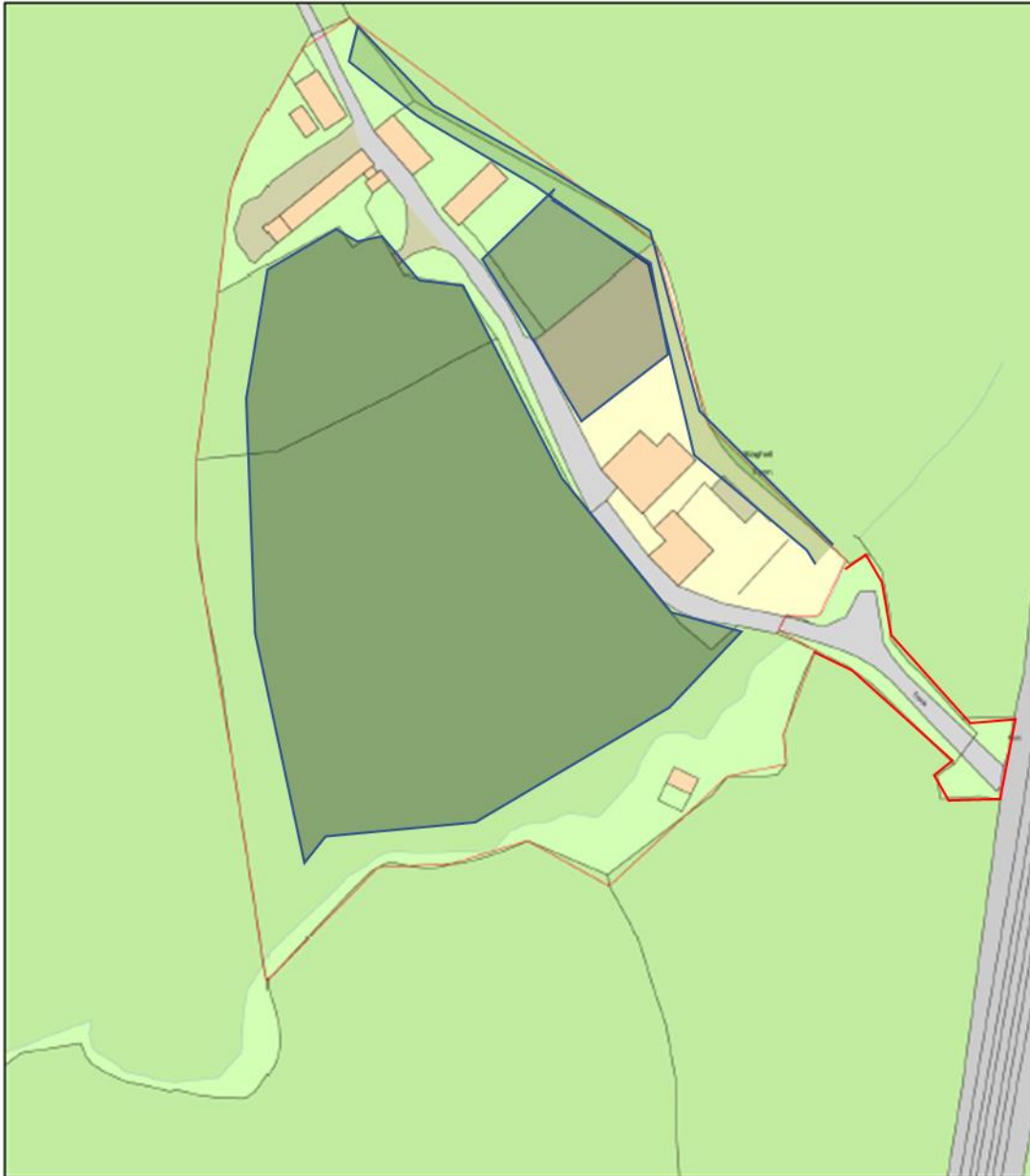
Green Infrastructure

54. In support of the emerging Local Plan, Stroud District Council produced the “Stroud District Open Space and Green Infrastructure Study (June 2019). Provision Standards are provided on pages 166/7 and Table 26. These indicate that the site fails to meet the minimum site size to require green infrastructure provision, though it would when considered as part of the PS19a/South Standish allocation. Nevertheless, the existence of the brook and existing tree and hedgerows support the provision of green infrastructure in the form of wildlife and movement corridors.

Number of dwellings

55. The Local Planning Authority indicated that, depending on the character of a site, it would work to 20-25 dwellings per hectare (dph) for a rural/urban fringe low density site, 30 dph for medium density typical suburban site, and 40-50 dph for a high density urban site. Blocks of flats can be up to 100dph.
56. The characteristics of Stagholt Farm could best be described as “rural/urban fringe” and will therefore be assumed to be 20-25 dwellings per hectare.
57. Considering the constraints illustrated in Figure 4, and excluding land around the existing farmhouse, the land available will be as shown in **Figure 5**.

Figure 5: land available for strategic housing allocation

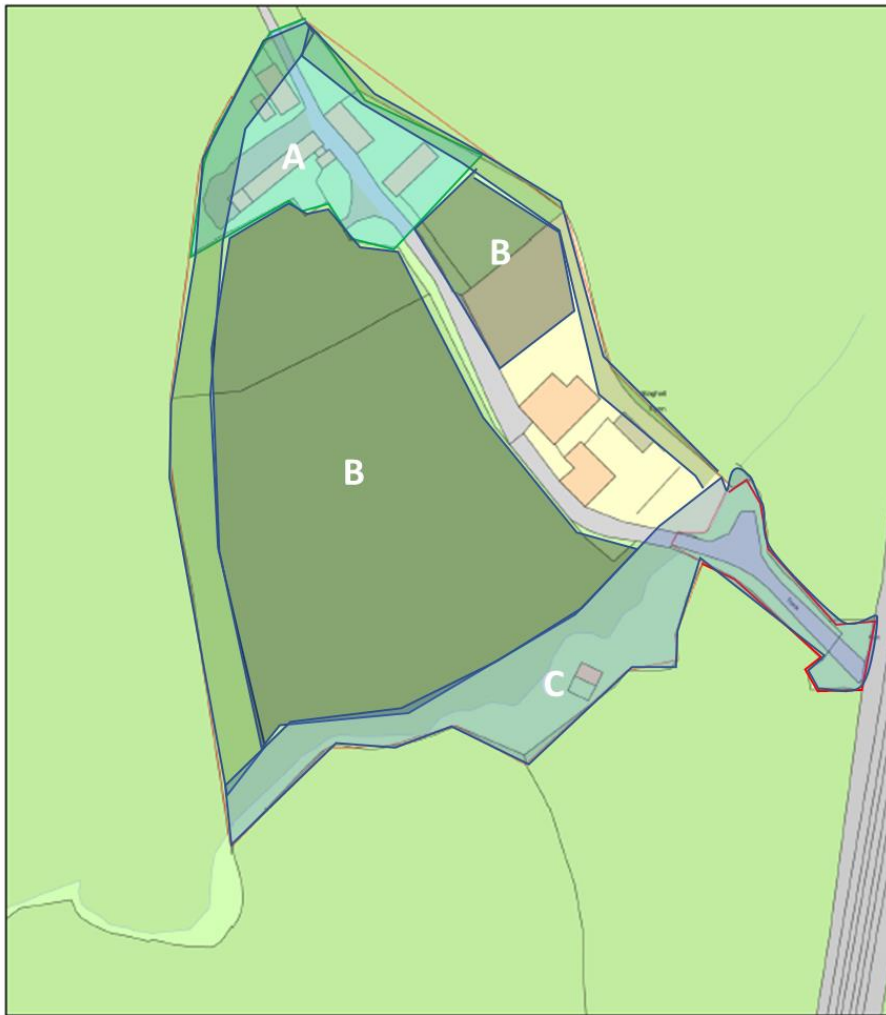


58. The land shaded in dark green in **Figure 5** is approximately 0.8 hectares. This would equate to 24 dwellings (7 affordable, 17 market rate dwellings). In addition, the previously developed land to the north of the site could be redeveloped as conversions or modified for small B class uses in keeping with their current uses.

Recommendation

That land at Stagholt Farm is allocated as a housing site, only upon allocation of the site known as PS19a/South Standish in the adopted Stroud District Plan Local Plan for the following purposes:

- Redevelopment of existing farm buildings as small E class uses, self-build residential accommodation, small-scale tourism and lodging, in the area marked A.
- Provision of 24 new dwellings (including 7 affordable) in the area marked B.
- Retention and improvement of existing trees and hedgerows on the site.
- Creation of a new wildlife and water management area in the area marked C.



Appendix 1: Habitat Survey of Stagholt Farm and local area. (29.06.19)



Summary:

Hedgerows are the most widespread semi-natural habitat in the UK, they support a large diversity of flora and fauna. Hedgerows provide food and shelter for a great many invertebrates, birds and mammals and a refuge for wild plants and animals in intensively farmed habitats.

There is a dedicated plan Hedgerow Biodiversity Action Plan (HAP) which covers ancient and/or species rich hedges and all hedgerows that include one native woody tree or shrub that is dominant (80%+). (Woodland Trust)

Hedgerows can be roughly dated by recording all the woody species in a length of 30metres. Generally speaking, a new species is added every 100 hundred years but results gained can vary by 200 years either way. Therefore if 9 species are found then the hedgerow is 900 years old but there is a margin of latitude so it could be between 700 and 1100 years old. Ideally, further information about the hedgerow is required to corroborate practical data collection.

The hedgerows with the most species in our survey were along the Lower Meadow and the arable agricultural area. It is possible that these hedgerows could be between 900 and 1,300 years old as 11 woody species were recorded.

Using this formula, hedgerows in the following areas

Habitat	Number of species recorded	Estimated age of hedgerow	Notes
Pond and stream area by house	5	500 years or between 300 to 700years	Some species are known to have been planted more

			recently
Walking to Black bridge	10	1,000 years old or between 800 and 1,200 years old	
Between Black Bridge and farm track	10	1,000 years old or between 800 and 1,200 years old	
Along track to farm	10	1,000 years old or between 800 and 1,200 years old	
Top meadow and area by house	3	300 years old or between 100 and 500 years old	
Lower Meadow	11	1,100 years old or between 900 and 1,300 years old.	
Arable field	11	1,100 years old or between 900 and 1,300 years old.	

The Lower Meadow at Stagholt had at least 11 different species of flowering plant per square metre making it 'moderately species rich' (magnificent meadows). 7 species of butterfly were observed with 120+ butterflies recorded in this area.

All of these areas supported a large diversity of butterflies and some dragonflies were also observed.

There were several mature trees, predominantly Ash, in the area, mostly in the hedgerows. Further study of the trees will be undertaken.

Further study of invertebrates in the area will be undertaken.

Background information:

Present: Terry Hefferman (owner of Stagholt Farm), Sue Hartley, Gerald Hartley, Keren Mattfield, Jackie Knights, Rob West, Alison Widgery, Roy Widgery

This informal habitat survey was carried out to look in more detail at the area of Stagholt farm and the adjoining fields as the building of a large (500 house plus small industrial area) building development has been proposed in the area.

Weather conditions:

A very hot, dry, sunny day 11am to 1.45pm.

Aims:

To identify the types of habitat in the area.

To identify areas of habitat that may be important for local wildlife.

To identify particular features where further, more specific, surveys could be useful.

To record the flora and fauna present, at that time, in the area. Looking particularly at hedgerows, trees and meadows.

To develop a vision to show how the local area could be improved for wildlife.

To work with landowners to manage the area for wildlife.

To update Gloucester Naturalist Trust with details of habitats present in the area.

To shape recommendations to developers by providing them with information gained in this survey about the sites of current wildlife corridors.

To use information gained to recommend how habitats and wildlife can be protected in a large development.

The information will also be used to support the emotional and physical wellbeing of those who live in the new development, if it goes ahead.

To support planning authorities by providing information that can be used to support the case for the conservation of threatened habitats, especially in work connected with planning appeals.

Methodology:

The group met Terry Hefferman (owner of Stagholt farm) at Black Bridge on the B4008. He then led us along the track towards Stagholt farm. We walked through private areas as well as PROWs.

We recorded the obvious habitats, flora and fauna seen at the time and noted areas for more detailed surveys.

Habitats:

Meadow, Mature hedgerows, Running water (stream), Pond, Wild, mature water margin, Orchard, Mature trees, Arable agricultural land

Flora and Fauna:

The following were observed during the survey period:-

	Approximate number seen	Habitat	Areas to be surveyed in more depth
Pond and stream area		Pond, wild mature water	

by house		margin, running water	
Large Red Damsel Fly	5		
Beautiful Demoiselle	1		
Cherry			
Alder			
Willow			
Sweet Chestnut			
Buckthorn			
Song Thrush			
Marbled white	1		
Brimstone larvae	5		
Walking to Black bridge		Mature hedgerows, mature trees	
Ringlet	3		
Small White	1		
St John's wort			
Honeysuckle			
Field Maple			
Ash			
Hawthorn			
Oak			
Blackthorn			
Elderberry			
Dogwood			
Dog rose			
Bramble			
Between Black Bridge and farm track		Mature hedgerows, mature trees	
Marbled white	1		
Meadow Brown	15		
Large Skippper	5		
Comma	2		
Ringlet	8		
Small Tortoiseshell	2		

Red Admiral	3		
Oxeyed Daisy			
Lucerne			
St John's wort			
Dog Rose			
Field Mallow			
Honeysuckle			
Field Maple			
Ash			
Hawthorn			
Oak			
Blackthorn			
Elderberry			
Dogwood			
Dog rose			
Bramble			
Black Cap			
Chiff Chaff			
Linnet			
Long tailed tits			
Along track to farm			
Ringlet	23		
Meadow Brown	32		
Large Skipper	8		
Honeysuckle			
Field Maple			
Ash			
Hawthorn			
Oak			
Blackthorn			
Elderberry			
Dogwood			
Dog rose			
Bramble			

Top meadow and area by house		Meadow, Mature hedgerows, mature trees	
Meadow brown	5		
Ringlet	2		
Large skipper	3		
Small White	1		
Oxeye daisy			
Wild carrot			
Ox tongue			
buttercup			
Self heal			
Teasel			
Ladies' bedstraw			
Lime			
Willow			
White poplar			
Lower Meadow		Meadow, Mature hedgerows, mature trees	
Common Blue	1		
Red Admiral	5		
Large Skipper	2		
Marbled White	10		
Ringlet	15		
Painted Lady	2		
Meadow Brown	75		
Bugle			
Self Heal			
Wild Carrot			
Ladies' Bedstraw			
Greater Knapweed			
Silverweed			
Red Clover			
White Clover			
Burdock			
Ox tongue			
Crane's Bill			

Hazel			
Honeysuckle			
Field Maple			
Ash			
Hawthorn			
Oak			
Blackthorn			
Elderberry			
Dogwood			
Dog rose			
Bramble			
Meadow ants			
Arable field		Arable agricultural land, Mature hedgerows, mature trees	
Ringlet	7		
Meadow Brown	15		
Comma	1		
Emperor Dragonfly	1		
Honeysuckle			
Field Maple			
Ash			
Hawthorn			
Oak			
Blackthorn			
Elderberry			
Dogwood			
Dog rose			
Bramble			
Wild pear			

Bibliography

Woodland Trust – Ancient Tree Inventory

Save our magnificent meadows

Bumblebee conservation Trust

