

*Submission Draft*

# **Standish Neighbourhood Development Plan 2040**

**Standish Development  
Framework**

**Evidence Paper**

**October 2021**

**Standish  
Parish  
Council**



## INTRODUCTION

1. The purpose of this report is to set out the planning case for the introduction of a countryside policy in the Standish NDP.
2. The report is set out in two parts:
  - Part 1: This section summarises the available evidence and examines how it supports the proposed policy;
  - Part 2: This section is a review of the available planning evidence.

## Contents

INTRODUCTION.....	2
PART 1: Countryside Development Zone Framework - justification .....	4
Summary of the evidence in this report .....	4
The landscape and biodiversity impact of introducing a strategic development in Standish.....	7
PART 2: REVIEW OF RELEVANT PLANNING EVIDENCE .....	13
Biodiversity.....	13
Standish Airfield .....	17
Strategic Nature Areas .....	21
Landscape .....	22
Standish Landscape Appraisal, Illman Young, (July 2019).....	22
Standish Landscape Character Assessment, Juliet Bailey, (2013, updated 2019/20).....	22
Evaluation Of Site Landscape And Visual Issues (October 2019).....	30
Landscape Sensitivity Appraisal, (July 2013) .....	32
Landscape Sensitivity Assessment, (December 2016) .....	34
Green Infrastructure .....	41
Stroud District Open Space and Green Infrastructure Study (June 2019) .....	41
AONB.....	50
Cotswolds Area of Outstanding Natural Beauty Management Plan 2018-2023.....	50
Dark Skies, CPRE, 2015.....	53
Gloucestershire Historic Environment Record (HER).....	55

## PART 1: Countryside Development Zone Framework - justification

### Summary of the evidence in this report

3. This report reviews a wide range of environmental and landscape evidence. New evidence was commissioned by Standish Parish Council, attached as a separate document, "Landscape Appraisal".
4. The evidence is complex and varied in scope. Therefore, to assist the reader, the main points that are drawn from all evidence relating to the countryside, landscape and biodiversity are set out in the box below.

#### Summary of evidence

Standish is a rural parish of scattered hamlets divided into three broad landscape zones – escarpment, foot-slopes and plain. The Escarpment is part of the Cotswold Area of Outstanding Natural Beauty and is principally woodland, and limestone pasture. The Foot-slopes and Lowland Plain are mixed farmland.

The parish provides some breath-taking views, especially from the Escarpment. This zone is part of a major landscape feature, the Cotswold Ridge. Parts of Standish are thus visible from the Brecon Beacons some 40 miles distant, from much of the Severn Vale south of Gloucester, as far as the Severn Bridges and Forest of Dean, and northwards to the Malvern Hills and beyond. The views out of the zone are similarly impressive, though marred by modern developments such as the Muller factory in Stonehouse, the M5, the Javelin Park waste incinerator, the new warehouses on the St Modwen's site on Stonehouse Road, Haresfield and the roofs of Dobbies Garden Centre at M5 junction 12.

Standish falls within an area designated as providing Strategic Green Infrastructure and AONB. Green Infrastructure is defined as "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities" according to the NPPF.

The Gloucestershire Local Nature Partnership identifies the following key environmental and social benefits of green infrastructure:

- Ensuring a more attractive place for people to live, work and visit

- Giving opportunities for outdoor relaxation, play and access to nature
  - Improving health and well-being – lowering stress levels and providing
  - opportunities for exercise
  - Helping climate change adaptation, for example by flood alleviation and cooling urban heat islands
  - Improving air and water quality
  - Giving space for habitats and providing wildlife corridors and linkages
  - Providing sustainable transport routes – for cycling and walking
  - Enabling local food production - in allotments, gardens and through agriculture

Standish sits on the western edge of the AONB, and approximately the eastern half of the parish lies within it.

The AONB Management Plan seeks to ensure that neighbourhood plans pay regard to the setting of the AONB and the AONB itself. Planning decisions should have regard to the scenic quality and ensure that views are conserved and enhanced. It also requires that there should be safe, pleasant, accessible, clearly waymarked and well-connected Public Rights of Way across the AONB. Local communities from the surrounding areas should be a priority for engagement. The management plan seeks to increase the provision of walking, cycling and riding routes, including easy access routes for the disabled, opportunities to access and interact with nature, and volunteering and personal development opportunities.

The Stroud District Open Space and Green Infrastructure Study (June 2019) indicates that for the Strategic Allocation PS19a/South Standish, the proposal should include provision of allotments, parks and recreation grounds, children’s play areas, youth access and Accessible Natural Greenspaces to meet identified under provision.

The Vision for Standish 2040 seeks to retain a separate identity for the parish including its tranquil rural character. Standish is not suitable for development under current Development Plan policy because it is so sparsely populated and undeveloped. The parish remains identified as “unclassified” in the settlement hierarchy in the Local Plan.

The Standish countryside has intrinsic value as a place for agriculture, recreation and a home for wildlife.

The Draft Local Plan makes clear that it is necessary to significantly increase the available housing and economic development land across the District and that this should be reflected in land allocations in the Local Plan when it is adopted. The proposed strategic allocation in the Draft Local Plan (2021) is for 700 homes and 5 hectares of employment land in Standish Parish.

Taken together, the current SA2/Great Oldbury allocation and the PS19a/South Standish allocation will cause a dramatic and harmful landscape impact upon the parish and, it can be argued, on Stonehouse as well. This impact will be felt in the following ways:

- The views of the AONB and from the AONB will be harmed by introducing large-scale urban development into the agricultural setting, thus affecting the AONB and its setting.
- There will be a loss of Green Infrastructure for Standish and Stonehouse with all the benefits that this provides.
- There will be a loss of habitat for protected species.
- Public Rights of Way (PROW) that currently traverse open countryside will become urbanised.

The setting to the south of the Standish Church (Grade I listed), Court and Village Hall (both Grade II Listed) is clearly defined by a shallow localised ridge running east/west to the south of the site. For any further development to be considered on the land to the north of PS19a/South Standish, this ridgeline should be fully considered. New development should not be visible from the Church, Court and Village Hall in order to preserve their setting.

Land to the north of the Church, Court and Village Hall continues to be unsuitable for major development and should retain its character as Countryside and should continue not to be designated within the settlement hierarchy.

Elsewhere in the parish, agriculture is currently the predominant land use in the Parish, particularly in locations that would provide green infrastructure for Stonehouse and PS19a/South Standish. The local character is based upon this land use and there are no proposals to change this. However, certain land uses might be acceptable in the rural parish as set out in NPPF 2021 paras. 80 and 84. Other development, particularly that which introduces an urban character, should be strongly resisted unless related to Strategic Allocations.

The parish countryside also has value for nature and biodiversity and there should be no further loss of habitats or erosion of the environment. There are two Strategic Nature Areas (SNAs) in Standish Parish. Both lie within the AONB (SNA 120 and SNA121). NDP policy S2 will require links and nature corridors between PS19a/South Standish and the countryside and measures should be taken wherever possible to strengthen and enhance opportunities for nature to thrive, according to Local Plan policy ES6.

Policies in the Stonehouse NDP seek to introduce enhanced PROW with wildlife corridors. It will be necessary for the Standish NDP to carry these routes forward over new development at PS19a/South Standish. This is addressed in NDP policies S2, S3 and S4.

There is an extensive PROW network crossing the parish in a network that leads from Stonehouse to the AONB. NDP policy S3 sets out how this network can be improved and strengthened to offer better and more enjoyable sustainable transport options for Stonehouse and Standish.

Maintaining the PROW network in good condition and suitable for a range of users including those with limited mobility will be key to delivering green infrastructure objectives from the Gloucestershire Local Nature Partnership and as specified in Local Plan policy E112. The Sustainable Transport Evidence Paper provides detailed evidence on where PROW improvements are required and NDP Policies set out how these improvements will be delivered.

Standish's lack of infrastructure had led to its identification as "Difficult: some services inaccessible by public transport or transport or travel time greater than 30 minutes". This could be ameliorated by development in PS19a/South Standish which could supply necessary services to the whole parish. However, according to Local Plan Policy EL13, much of this should be accessible by using non-motorised transport.

Therefore, the PROW network will take on greater importance for sustainable transport when the PS19a/South Standish is developed. The PROW network will both provide access to green infrastructure for the new residents and other people who live in Stonehouse who wish to have access to the countryside. It will also enable existing residents of Standish Parish to access necessary services by using sustainable modes of transport. For these reasons, the NDP will seek to strengthen and enhance the existing PROW network in Standish so that it enables new development to be more sustainable and increases accessibility to community and green infrastructure. This is addressed in NDP policy S2.

To address these points, this NDP sets out a comprehensive Development Zone Framework including broad principles for future development. These principles should be used in conjunction with policies in the Development Plan.

Standish Parish Landscape Assessment and other evidence indicate that the parish can be divided into several character areas. Each will require a different approach to development management.

## The landscape and biodiversity impact of introducing a strategic development in Standish

5. The Draft Local Plan makes clear that it is necessary to significantly increase the available housing and economic development land across the District and that this should be reflected in land allocations in the Local Plan when it is adopted.



6. The Parish Council considers that it is acceptable to allow development at PS19a/South Standish should no better sites become available during the evolution of the District's spatial strategy.
7. However, the allocation would constitute a major incursion into the existing rural landscape. Standish Parish is so sparsely populated and lacking in infrastructure that it fails even to qualify as a unclassified settlement, outside the settlement hierarchy. Therefore, its current designation is one where only the most limited amount of development can be considered.
8. Taken together, the current SA2/Great Oldbury allocation and the PS19a/South Standish allocation will cause a dramatic and harmful impact upon the parish and it can be argued on Stonehouse as well. This impact will be felt in the following ways:
  - a) The views of the AONB and from the AONB will be harmed by introducing large-scale urban development into the agricultural setting, thus affecting the AONB and its setting.
  - b) There will be a loss of Green Infrastructure for Standish and Stonehouse and all the benefits that this provides.
  - c) There will be a loss of habitat for protected species and other wildlife.
  - d) Public Rights of Way that currently traverse open countryside will become urbanised.
9. Since allocation PS19a/South Standish falls entirely within Standish Parish, it is within the gift of the Neighbourhood Plan to seek to offset and manage these harmful impacts. Development in the parish should seek to retain its rural character such that where it occurs, it should be well-assimilated by the local topography, existing hedgerows and woodland, and be strongly reinforced by planting where this is necessary to retain this wooded agricultural character.
10. The effect of major development in the parish on PROW will be adverse or strongly adverse from almost every location where extensive or clear views can be seen, unless the layout of development can be appropriately arranged and suitably mitigated.
11. Long and near distance views from the AONB must be protected. The effect of current allocations at SA2/Great Olbury is significantly adverse.
12. In order to protect these views, any new development at PS19a/South Standish must have substantial boundary preservation and treatment and internal planting. This is especially important at the northern and eastern boundary of PS19a/South Standish. Employment and residential allocations on PS19a/South Standish are not appropriate unless the height of the buildings is not taller than a 2-storey house. Existing vegetation and hedgerows should be retained.
13. Major development will require a full landscape strategy as set out in the report and illustrated in **Figures 8 and 9 of the Illman Young Landscape Appraisal (2019)**.



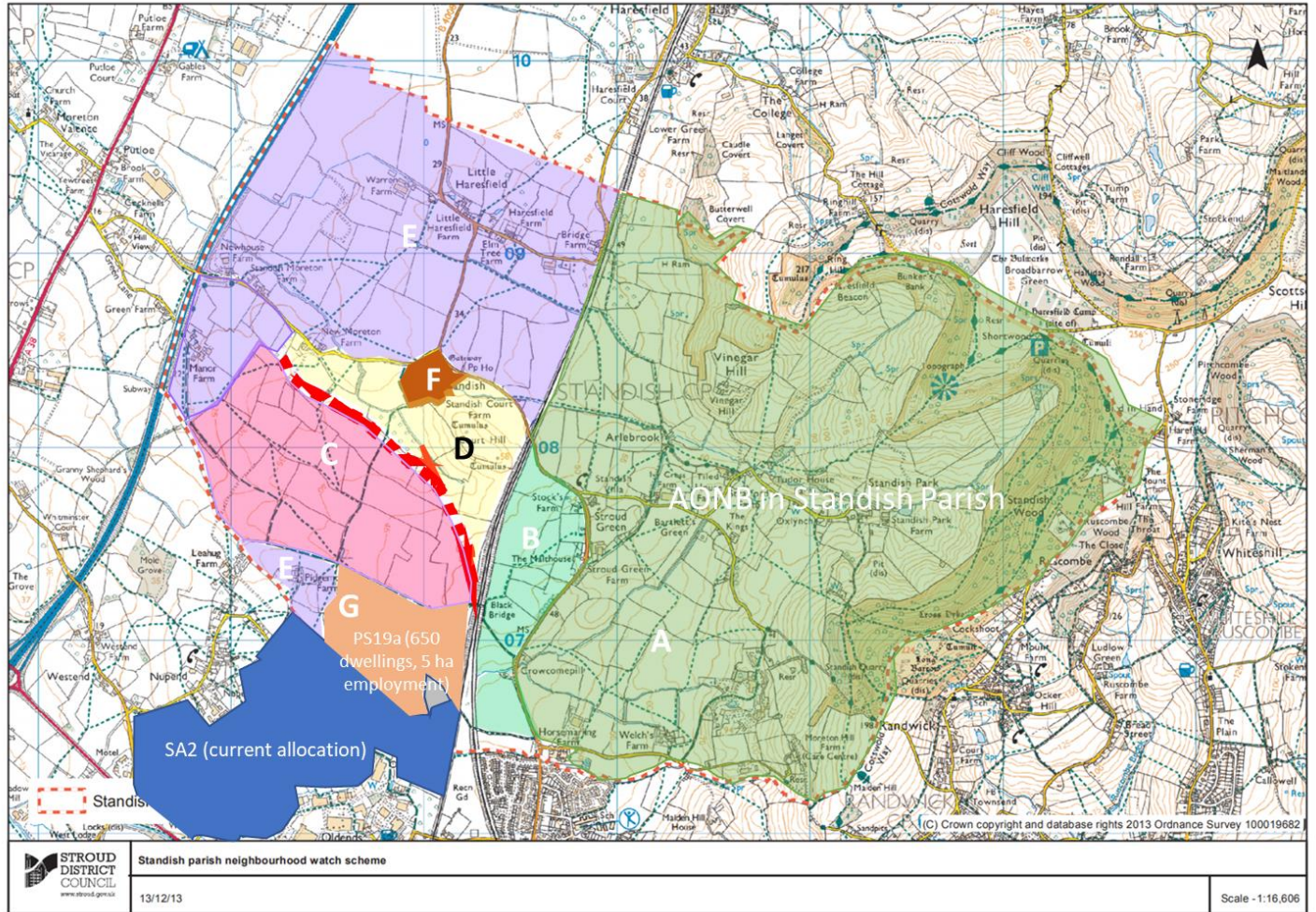
14. Land adjacent to watercourses should be reserved for public open space, Sustainable Urban Drainage Systems (SUDS) and walking, cycling and equestrian activities.
15. Land east of the railway line forms part of the setting of the AONB though it is not contained within it. However, the railway line forms a more clearly identifiable boundary and this land should therefore be safeguarded as part of the setting of the AONB.
16. The setting to the south of the Standish Church (Grade 1 Listed), Court and Village Hall (both Grade 2 Listed) is clearly defined by a shallow localised ridge running east/west to the south of the site. Should further development be considered on the land to the north of PS19a/South Standish, this ridgeline must be fully considered. New development should not be visible from the Church, Court and Village Hall in order to preserve their setting.
17. Land to the north of the Church, Village Hall and Court continues to be unsuitable for major development, and should retain its character as Countryside (as discussed in the NPPF), not designated within the settlement hierarchy.
18. The likely design of new development at PS19a/South Standish cannot yet be understood given that the site has not been allocated and, until it is, it is inappropriate development in the countryside. It is for this reason that in another policy, the NDP will set out clear criteria for a master plan for the development should it come forward.
19. Part of that masterplan will require the development at PS19a/South Standish to provide linkages to surrounding green infrastructure so that new parishioners will be able to enjoy the same level of beautiful countryside as the current residents. The NDP is based on democratic principles and all parishioners should have equal access to the benefits that life in Standish offers. For this reason, it is necessary for the NDP to ensure that good quality Green Infrastructure is available for new as well as existing residents.
20. Agriculture is currently the predominant land use in the parish, particularly in locations that would provide green infrastructure for Stonehouse and PS19a/South Standish. The local character is based upon this land use and there are no proposals to change this. However, certain land uses might be acceptable in the parish as set out in NPPF 2021 paras. 80 and 84. Other development, particularly that which introduces an urban character, should be strongly resisted.
21. The agricultural character of the land adjacent to PS19a/South Standish has some value for nature and biodiversity. There should be no further loss of habitats or erosion of the environment. The masterplan will require links and nature corridors between PS19a/South Standish and the countryside and measures should be taken wherever possible to strengthen and enhance opportunities for nature to thrive, according to Local Plan policy ES6.
22. Policies in the Stonehouse NDP seek to introduce enhanced PROW with wildlife corridors. It will be necessary for the Standish NDP to carry these routes forward over new development, such as that at PS19a/South Standish should that be allocated.

- 
23. There are two Strategic Nature Areas (SNAs) in Standish Parish. Both lie within the AONB (SNA 120 and SNA121).
  24. There is an extensive PROW network crossing the parish leading from Stonehouse to the AONB. Other policies in this NDP suggest how this network can be improved and strengthened to offer better and more enjoyable sustainable transport options for Stonehouse and Standish.
  25. Maintaining the PROW network in good condition and suitable for a range of users including those with limited mobility will be key to delivering green infrastructure objectives from the Gloucestershire Local Nature Partnership and as specified in Local Plan policy EI12
  26. Standish's lack of infrastructure had led to its identification as "Difficult: some services inaccessible by public transport or transport or travel time greater than 30 minutes". This could be ameliorated by development in PS19a/South Standish which could supply necessary services to the Parish. However, according to Local Plan Policy EL13, much of this should be accessible by using non-motorised transport.
  27. Therefore, the PROW network takes on greater importance for sustainable transport, if and when this strategic site is developed. The PROW network will provide access to green infrastructure for the new residents and other people who live in Stonehouse who wish to have access to the countryside. It will also enable existing residents of Standish Parish to access necessary services by using sustainable modes of transport. For these reasons, planning policy should seek to strengthen and enhance the existing PROW network in Standish so that it enables new development to be more sustainable and increases accessibility to community and green infrastructure. This is addressed in NDP policy S3: Sustainable Transport.
  28. The Gloucestershire Countryside Access and Rights of Way improvement plan highlights the valuable role that PROW plays in helping people maintain a healthy lifestyle through regular walking, horse-riding and cycling.
  29. To address these points, this NDP sets out this comprehensive Development Framework containing broad principles for future development. These principles should be used in conjunction with policies in the Development Plan.
  30. Standish Parish Landscape Assessment and other evidence indicate that the parish can be divided into several character areas. Each will require a different approach to development management. The Character areas are illustrated in **Figure 1 and Table 1**:

Table 1: Standish Parish Character Areas

Area A	The Area of Outstanding Natural Beauty (AONB) is subject to its own masterplan and under footnote 7 of the NPPF 2021 is an area protected as an asset of particular importance. Development would not normally be appropriate here.
Area B	This area falls outside the AONB but is an important feature of its setting. Development should be strongly resisted where it has a negative impact upon the setting of the AONB..
Area C	This area is bounded by the possible Strategic Allocation PS19a/South Standish to the south, the local ridge that protects the setting of the Standish Church, Hall and Court. Development in this area would generally be inappropriate as a countryside location. However, should development be proposed, a landscape assessment would be required that mitigated impacts upon the AONB and the setting of the Standish Church, Hall and Court and other historic assets.
Area D	This area is bounded to the south by a low ridge that blocks views from Standish Church, Hall and Court and to the north by the B4008. This area constitutes the setting of these listed buildings and other historic assets associated with them. Development in this area would generally not be appropriate unless it can be demonstrated that the setting of the historic assets will not be harmed.
Areas E	This land is countryside where only rural development would be appropriate (NPPF 2021 paras. 80 and 84) .
Area F	This is the historic village of Standish where the Church, Hall and Court listed buildings are located.
Area G	Local Plan Strategic allocation PS19a/South Standish.

Figure 1: Standish Parish Character Areas





## PART 2: REVIEW OF RELEVANT PLANNING EVIDENCE

### Biodiversity

31. Standish Parish falls into two landscape management areas. There is a predominance of managed farmland to the west of the B4008, and the Cotswold Area of Outstanding Natural Beauty (AONB) lies to the east of the B4008. Biodiversity is strongly influenced by the different management methods.
32. A member of the Standish community works for Keystone Ecology, which has prepared the plan in **Figure 2** showing the range of protected species that have been detected in Standish parish. The agricultural land to the west of the B4008 contains a number of protected species, including bats, badger, water vole, hobby and barn owl, though the concentrations are not high. Brown hare, redwing and great crested newt recordings are particularly common. In the AONB, where deciduous woodland predominates, there is a non-statutory site of natural importance. There are also a number of traditional orchards around the Standish settlement and to the west of the Standish settlement.
33. The parish is dominated by agricultural and orchard habitats with deciduous woods on the scarp in the AONB. This is illustrated in **Figure 3**.

Figure 2: Protected species in Standish (August 2014)

Standish Development Framework evidence paper

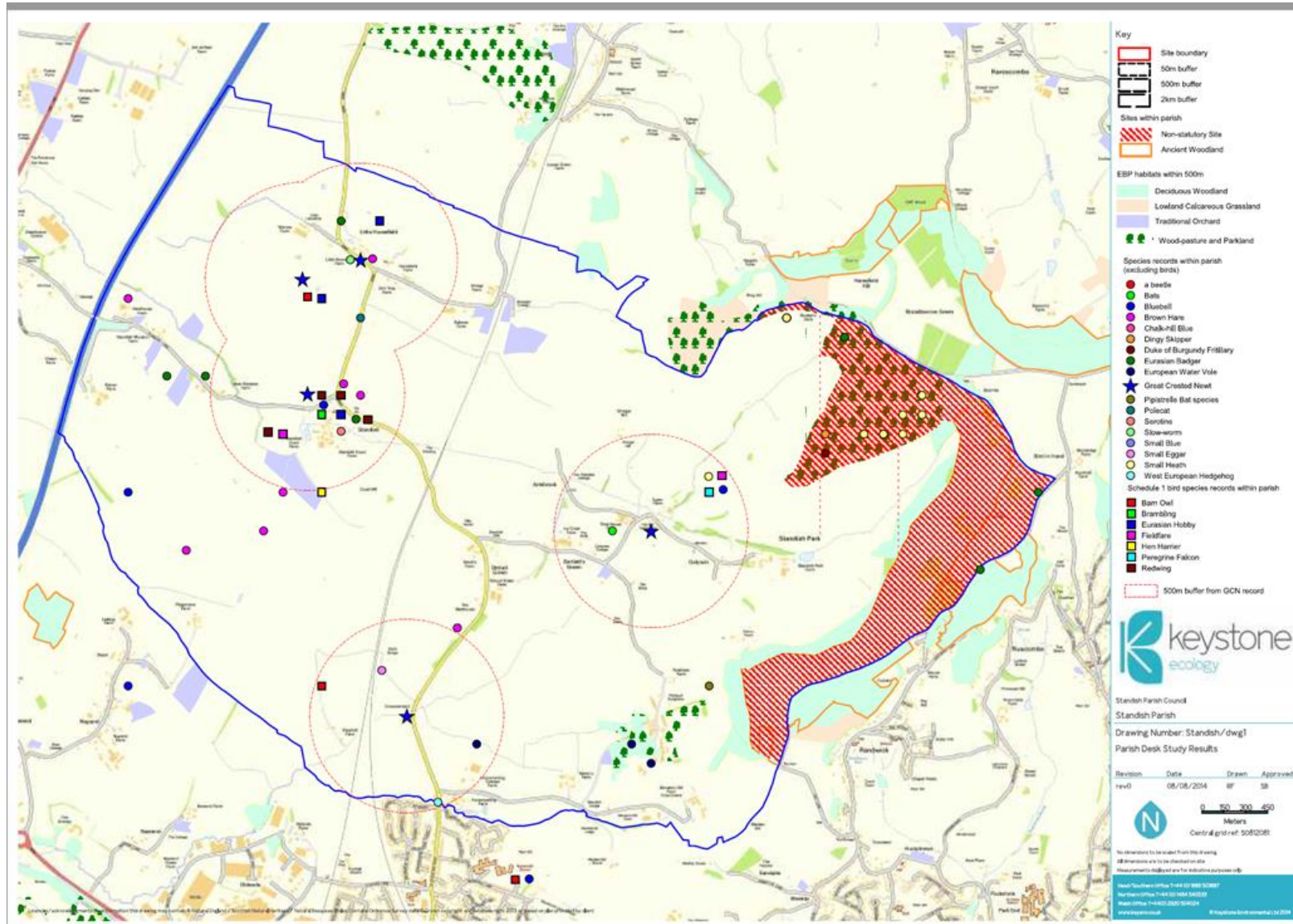
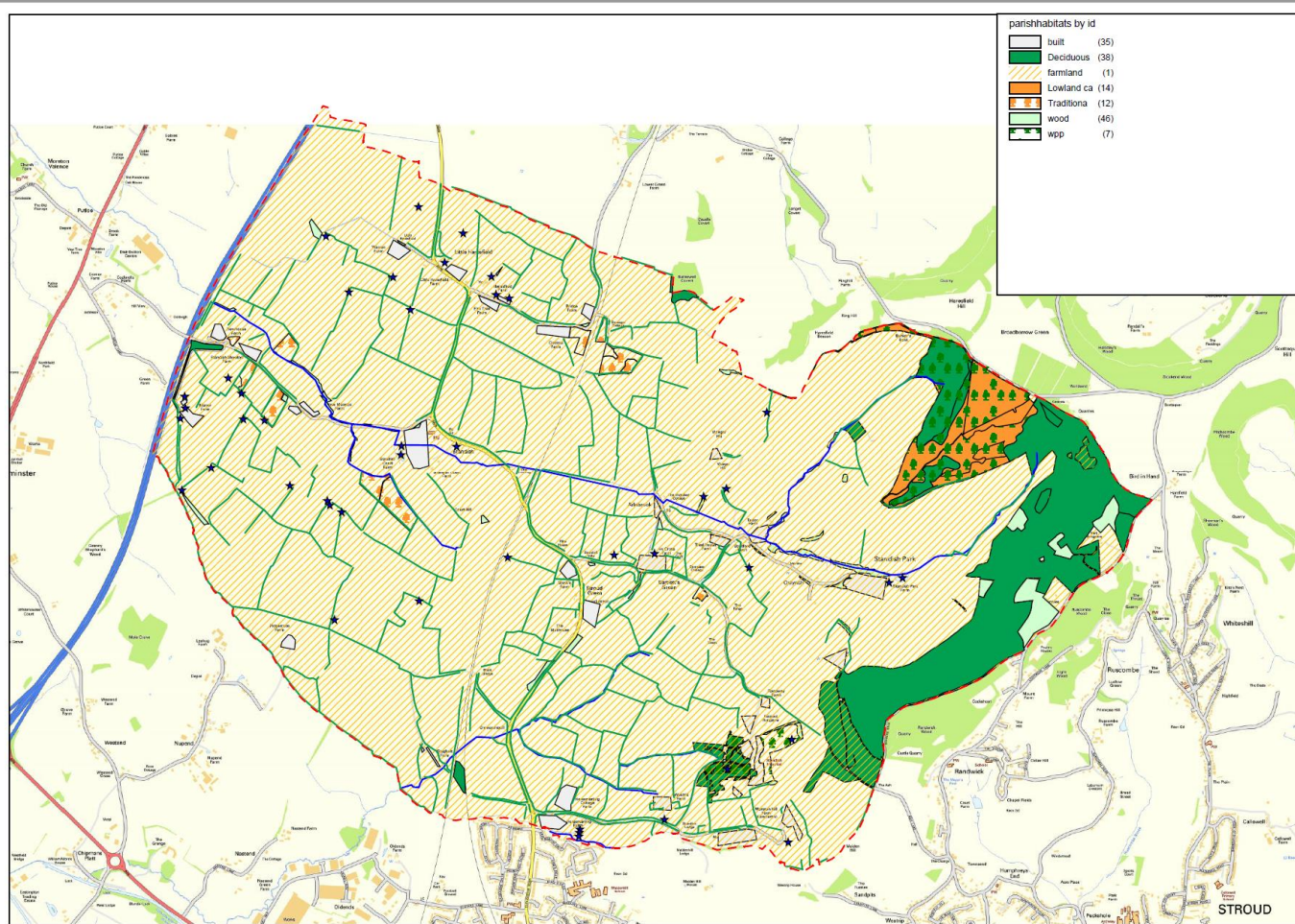




Figure 3: Parish Habitats



Source: Keystone ecology

## Standish Airfield

34. **RAF Moreton Valence/Standish** was a test site for the Gloster Aircraft Company and an important airfield in its own right. Situated between the A38 and B4008, it opened in 1939 and was closed in 1962. **Figure 4** shows its location. During WW2, it had three concrete runways and associated aircraft hangars including A1, Blister, B1 and B2 types. It was a satellite of RAF Staverton and was used by an Advanced Flying Unit of Royal Air Force Flying Training Command. The site also hosted secret tests of the Armstrong Whitworth Albemarle bomber. Beginning in October 1943, it was also used by Gloster aircraft for testing Meteor jet aircraft and, post war, Javelins. The airfield's runway had been extended to 6,000 feet to allow testing of the Meteor. A section of the M5, which now bisects the old airfield, was built on the original 6,000ft runway. Some of the original runways are still obvious on New House Farm and Warren Farm. The site has not been fully remediated since coming out of industrial or military use.
35. Standish Airfield Meadow: Centroid SO7927051 (approximately 8 hectares) This is an area of high quality grassland supporting a richly biodiverse habitat of plants, insects, birds and mammals on the site of a wartime airfield. According to the current farmer, it has never been ploughed and thus is probably ancient grassland. Following the submission of a botanical survey carried out by Juliet Bailey in July 2020, the meadow has been placed on Natural England's **Priority Habitats Inventory**. This will appear on the Natural England data base when it is next updated. Photos of the airfield are below and a plant list is shown in the box below.

### Plant List for Standish Airfield Meadow, centroid SO792094 Compiled from records 2004-2020 by Juliet Bailey

1.	<i>Achillea millefolium</i>	Yarrow
2.	<i>Agrimonia eupatoria</i>	Agrimony
3.	<i>Agrostis capillaris</i>	Common Bent
4.	<i>Agrostis stolonifera</i>	Creeping Bent
5.	<i>Allium vineale</i>	Crow Garlic
6.	<i>Alopecurus pratensis</i>	Meadow Foxtail
7.	<i>Anacamptis pyramidalis</i>	Pyramidal Orchid
8.	<i>Anthoxanthum odoratum</i>	Sweet Vernal Grass
9.	<i>Anthriscus sylvestris</i>	Cow Parsley
10.	<i>Arrhenatherum elatius</i>	False Oat-Grass
11.	<i>Bellis perennis</i>	Daisy
12.	<i>Bromus hordeaceus</i>	Soft-brome
13.	<i>Briza media</i>	Quaking Grass
14.	<i>Cardamine pratensis</i>	Cuckooflower
15.	<i>Carex flacca</i>	Glaucous Sedge
16.	<i>Centaurea nigra</i>	Common Knapweed
17.	<i>Cerastium fontanum</i>	Common Mouse-ear
18.	<i>Cirsium arvense</i>	Creeping Thistle
19.	<i>Cirsium vulgare</i>	Spear Thistle
20.	<i>Convolvulus arvensis</i>	Field Bindweed
21.	<i>Crepis capillaris</i>	Smooth Hawk's-beard

22.	<i>Cynosurus cristatus</i>	Crested Dog's-tail
23.	<i>Dactylis glomerata</i>	Cock's-foot
24.	<i>Dactylorhiza fuchsii</i>	Common Spotted-orchid
25.	<i>Festuca arundinacea</i>	Tall Fescue
26.	<i>Festuca pratensis</i>	Meadow Fescue
27.	<i>Festuca rubra</i>	Red Fescue
28.	<i>Galium verum</i>	Lady's Bedstraw
29.	<i>Geranium dissectum</i>	Cut-leaved Crane's-bill
30.	<i>Heracleum sphondylium</i>	Hogweed
31.	<i>Holcus lanatus</i>	Yorkshire-fog
32.	<i>Hordeum secalinum</i>	Meadow Barley
33.	<i>Hypochaeris radicata</i>	Cat's-ear
34.	<i>Juncus inflexus</i>	Hard Rush
35.	<i>Lathyrus pratensis</i>	Meadow Vetchling
36.	<i>Leontodon autumnalis</i>	Autumnal Hawkbit
37.	<i>Leucanthemum vulgare</i>	Oxeye Daisy
38.	<i>Linum catharticum</i>	Fairy Flax
39.	<i>Lolium perenne</i>	Perennial Rye-grass
40.	<i>Lotus corniculatus</i>	Common Bird's-foot-trefoil
41.	<i>Luzula campestris</i>	Field Wood-rush
42.	<i>Medicago lupulina</i>	Black Medick
43.	<i>Oenanthe pimpinelloides</i>	Corky-fruited Water-dropwort
44.	<i>Phleum pratense</i>	Timothy
45.	<i>Picris echioides</i>	Bristly Oxtongue
46.	<i>Plantago lanceolata</i>	Ribwort Plantain
47.	<i>Poa pratensis sens. lat.</i>	Smooth Meadow-grass
48.	<i>Potentilla reptans</i>	Creeping Cinquefoil
49.	<i>Primula veris</i>	Cowslip
50.	<i>Prunella vulgaris</i>	Selfheal
51.	<i>Pulicaria dysenterica</i>	Common Fleabane
52.	<i>Ranunculus acris</i>	Meadow Buttercup
53.	<i>Ranunculus bulbosus</i>	Bulbous Buttercup
54.	<i>Ranunculus repens</i>	Creeping Buttercup
55.	<i>Ranunculus sceleratus</i>	Celery-leaved Buttercup
56.	<i>Rumex acetosa</i>	Common Sorrel
57.	<i>Senecio jacobaea</i>	Common Ragwort
58.	<i>Silaum silaus</i>	Pepper-saxifrage
59.	<i>Succisa pratensis</i>	Devil's-bit Scabious
60.	<i>Taraxacum aggregate</i>	Dandelion
61.	<i>Tragopogon pratensis</i>	Goat's-beard
62.	<i>Trifolium dubium</i>	Lesser Trefoil
63.	<i>Trifolium pratense</i>	Red Clover
64.	<i>Trifolium repens</i>	White Clover
65.	<i>Trisetum flavescens</i>	Yellow Oat-grass
66.	<i>Veronica chamaedrys</i>	Germander Speedwell
67.	<i>Vicia sativa</i>	Common Vetch

Figure 4: Standish Airfield





Photos of Airfield Meadow, Standish



## Strategic Nature Areas

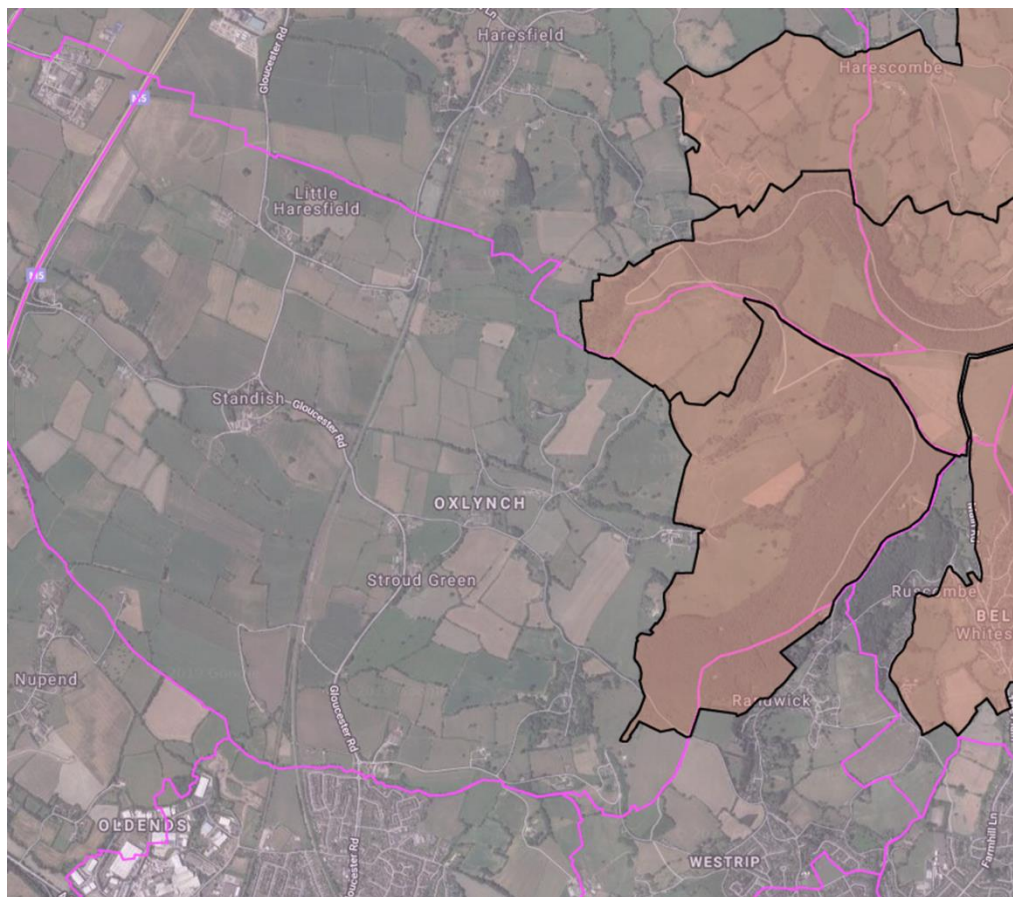
36. There are two Strategic Nature Areas (SNAs) in Standish Parish. Both lie within the AONB and are shown in **Figure 4**.

37. SNA 120: Cotswold Escarpment and Valley – Haresfield Hill: Main habitat: Lowland Calcareous (Limestone) Grassland.

38. SNA121: Cotswold Escarpment and Valley – Standish Park. Main habitat: Lowland Calcareous (Limestone) Grassland.

SNAs are areas of countryside that contain higher than average concentrations of existing wildlife habitats such as native woodlands, flower rich grasslands, bogs and heathland.

Figure 4: Strategic Nature Areas



Source: Gloucestershire Nature Map, Gloucestershire Centre for Environmental Records:  
<https://www.gcer.co.uk/doublemap3.html>



## Landscape

### **Standish Landscape Appraisal, Illman Young, (July 2019)**

39. Standish Parish Council commissioned Illman Young Landscape Design to undertake a Landscape Appraisal in connection with the NDP, published in July 2019. **This is attached as a separate document.**

40. The Landscape Appraisal should be read in its entirety and will not be summarised here.

### **Standish Landscape Character Assessment, Juliet Bailey, (2013, updated 2019/20)**

41. Juliet Bailey, a local resident and environmental professional prepared a landscape character assessment of the Parish in February 2013. This was prepared before the Javelin Park incinerator had been built and is therefore somewhat out of date. In this section, that study has been updated though it is largely based upon the original 2013 study.

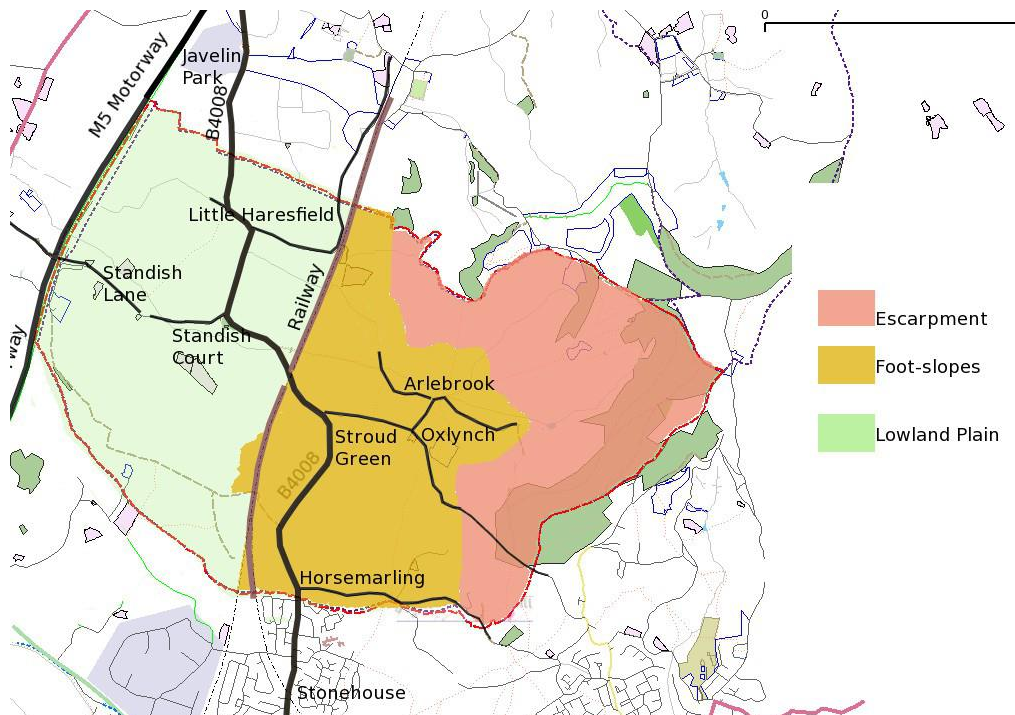
#### *Summary*

- Standish is a rural parish of scattered hamlets divided into three broad landscape zones – escarpment, foot-slopes and plain.
- The Escarpment is part of the Cotswold Area of Outstanding Natural Beauty and is principally woodland, and limestone pasture. The Foot-slopes and Lowland Plain are mixed farmland.
- Fields are moderate in size and usually bounded by mixed species hedgerows. There are two main brooks and numerous ditches, especially in the Plain. Woodlands are limited to the escarpment, though there are remnant orchards on the lower ground. The two main tree species are ash and oak, of which there are some remarkable old examples.
- Buildings are very varied, with most of the older buildings either Cotswold stone or brick, with a few half-timbered.
- The major route through the parish is the B4008, which has several minor lanes and tracks joining it. The M5 forms part of the western boundary, and a railway line cuts the parish in half.
- This is a pleasant rural landscape, with some breath-taking views across 40 miles from the top of the Escarpment, elsewhere more intimate or expansive depending on topography.



## Introduction

42. Standish is a rural parish of roughly 1000 hectares in southern Gloucestershire. For its size, it has a small population of about 300, with 250 on the electoral register, occupying about 120 dwellings. 147 dwellings are currently being built at Standish House with a further 7 dwellings at Stagholt Pavilion. This will considerably increase the number of dwellings and, probably, double the population of Standish. There is no village centre, but the population is spread among six hamlets – Horsemarling, Stroud Green, Oxlync, Standish Court, Standish Lane, and Little Haresfield. There are also dispersed farmsteads, one having been converted to a care home for the elderly, Moreton Hill, which thus has a disproportionately large part of the population. The parish has a church and a village hall, but no other facilities such as shop, school or pub. At its southern end Standish butts up against the small town of Stonehouse, with the M5 forming part of the western boundary.
43. Following the landscape character assessment set out in the Stroud District Landscape Assessment of 2000 the parish of Standish can be divided into three broad landscape zones. At the east end of the parish is the Cotswold Escarpment, with its oolitic limestone ridge rearing up above the Severn Plain to 240m above sea level. This drops quickly away to give rolling escarpment Foot-slopes at its base. At the western side of the parish, the Foot-slopes merge into the Lowland Plain, where the almost flat landscape is at about 50m above sea level, formed geologically from river sediments of the Severn.



44. The whole is something like an amphitheatre, with its back nestling into the Cotswold ridge. From the top seats you get long views, across the Severn Vale to the Forest of Dean and Welsh mountains

beyond, and far up and down the valley to the Malvern Hills in Worcestershire and down to the Severn crossings near Bristol.



View from Moreton Hill to Stonehouse (Dairy Crest) and Severn Vale beyond (Jan 2013).

### *Land designations*

45. The Escarpment is designated as Cotswolds Area of Outstanding Natural Beauty. Much of it is Open Access Land under the Countryside and Rights of Way Act 2000.

### *Land-use*

46. The Escarpment is dominated by broadleaved woodland, principally ash and beech, and permanent pasture grazed by cattle and sheep. The top of the scarp is largely owned by the National Trust, with very popular open access to high-biodiversity oolitic limestone grassland and woodland, which is used by people from local towns such as Stroud and Gloucester for informal recreation.
47. The escarpment Foot-slopes are farmland, with the topography gentle enough to allow arable cultivation. Traditionally it was largely dairying, but now beef cattle and arable predominate. In the Lowland Plain the fields are largely arable, with wheat, barley, oil seed rape, fodder beans and fodder maize. This was once dairying country, and though there is still some stock farming, much of it relies



on grass leys. Little unimproved grassland remains, with a few notable exceptions such as part of the old air field on the western edge of the parish against the M5.



View across Standish Park farmland to scarp beyond (Jan 2013).

### *Field pattern and boundaries*

48. Escarpment fields are large (of the order 10-20ha) and field pattern has remained largely unchanged during the last century. Field boundaries are mostly mixed species hedges; drystone walls are rare. Field amalgamation has occurred on the Foot-slope and in the Plain, though most fields are still of only moderate size (approx. 5-15ha) bounded by rectilinear hedges, many of them dating from early nineteenth century enclosures, though a surprising number have bluebells and other woodland plants in the base, possibly indicating woodland origin.

### *Water courses and water bodies*

49. There are frequent water courses and ditches. The main water course in Standish is the Arle Brook which arises at springs high on the escarpment above Standish Park Farm and cuts down through the hamlet of Arle Brook to Standish Court, thence onto the plain. For most of its course down the escarpment it runs in a deep-cut course lined with alder and willow trees. The Horsemarling Brook, that also arises at springs on the Escarpment forms the boundary between Stonehouse and Standish parishes.
50. Flow can increase quickly when it is rainy, giving rise to regular minor floods across the B4008, and traffic disruption at Standish Court and at Little Haresfield. Standish Parish Council has been working with Stroud District Council and Gloucestershire Wildlife Trust to reduce flood risk in the parish. The Wildlife Trust has obtained a grant from the Environment Agency to address flood prevention on the Cotswold Escarpment from Stonehouse to Brockworth, so including Standish. One of the projects is a Rural Sustainable Drainage System (SuDS) at Standish Park – a major catchment area for the Arle Brook. A series of woody dams has been installed to hold back and delay the flow of water in periods of extreme rainfall, reducing flooding downstream and giving protection to properties that have been flooded in the recent past. This project was completed over winter 2019-2020.
51. There are still numerous field ponds that would have watered the stock when this was predominantly a dairying area. These are often marked by very handsome grey poplar trees.

### *Woodlands, orchards and notable trees*

52. The major blocks of woodland are on the escarpment, where the dominant trees are ash and beech, as well as some small blocks of conifers. The rest of the parish has groups of trees, especially round ponds and along watercourses, so perhaps gives the impression of being more wooded than it really is.
53. There are remnant orchards of apple, pear and plum trees, especially the long-lived perry pear, though there has been little new planting in the last 50 years at least. Old maps show a particular concentration of orchards round Oxlynch and Stroud Green.



Old perry pear orchard, Little Haresfield (Jan 2013)

54. There are some truly remarkable old oaks in the parish, stag-headed and hollow. There is a local story that they were planted on the funeral route of Edward II (1284-1327) from Berkeley (via Standish Church) to Gloucester, but given that they are way off the obvious route down the present-day A38, this should probably be taken with a pinch of salt.





Venerable oaks in arable field, Horsemarling (Jan 2013)

### *Buildings and settlements*

55. The Escarpment is generally too steep for settlement. On the Foot-slopes are the hamlets of Oxlynch and Stroud Green. There is a wide variety of building types, from a stately home at Standish Park, to substantial farmsteads such as the limestone Standish Park Farm and Horsemarling Farm, and half-timbered Tiled House Farm, with associated farm buildings. There are also cottages of various ages and quality in building styles from half-timber, to stone, to brick, to breeze block. This is the prettiest zone in the parish, a harmonious rural scene largely unspoiled by unsightly developments, with hidden sunken lanes, charming cottages, with views to the Cotswold ridge and glimpses out across the Severn plain.
56. On the Lowland Plain, the hamlet of Standish Court includes the parish church. Its tall spire is a landmark in the parish, and it has gorgeous 18<sup>th</sup> century table tombs set at rakish angles. The village hall is the upper part of an associated medieval building, Church House. This is perhaps the most coherent set of buildings in the entire parish, situated beautifully along the main road. Little Haresfield and Standish Lane present a mishmash of building types including listed brick and stone buildings of medieval to 18<sup>th</sup> century, together with more modern buildings and recent barn conversions, strung out along the B4008 and the lanes leading off it.

### *Vistas*

57. The parish provides some breath-taking views, especially on the Escarpment. This zone is part of a major landscape feature, the Cotswold ridge. Parts of Standish are thus visible from the Brecon Beacons some 40 miles distant, from much of the Severn Vale south of Gloucester, as far as the Severn Bridges and Forest of Dean, and northwards to the Malvern Hills and beyond. The views out of the zone are similarly impressive, though marred by modern developments such as the Muller factory in Stonehouse, the M5, the Javelin Park waste incinerator, the new warehouses on the St Modwen's site on Stonehouse Road, Haresfield and the roofs of Dobbies Garden Centre at M5 junction 12.



View from high on scarp across to Vinegar Hill, with Severn Vale and distant Malvern hills (Dec 2012)

58. The Foot-slope vistas are much more intimate, with glimpses out across the Severn plain, but generally more limited by the rolling topography, enclosed and sheltered by the Cotswold ridge rearing behind.

59. On the Lowland Plain the vistas open up again. This is an attractive landscape of ordered countryside, with views across the flat landscape to distant hills and nearer villages such as Whitminster and Haresfield.



## Evaluation of Site Landscape And Visual Issues (October 2019)

60. The landscape appraisal for site PS19/South Standish a is copied below.

Site reference: PS19a	Settlement: Stonehouse - North/north west of Stonehouse
<b>Landscape and designation context</b>	
National Character Area	Severn and Avon Vales
Stroud District LCA landscape character type	Escarpment foot slopes
Cotswolds AONB LCA Landscape character type	Settled Unwooded Vale
Stroud Landscape Sensitivity land parcel ref.	St07
Stroud Landscape Sensitivity to housing use	Medium
Landscape designations	Cotswolds AONB lies 400m to the east at closest point.
Historic designations	-
Biodiversity designations	-
Other potential constraints	Flood zone in south east corner. Several PROWs cross the site or run to the west.
(This report) comments on context	The site is identified as a potential candidate site with provisos. Key issues are the context of intervisibility with scarp/AONB, the extension of Stonehouse's built form to the north and potentially overtopping the gentle ridge to the north that currently encloses Stonehouse. The AONB is 400m to the east of the site at its closest point on the B4008, and views from the Cotswold Way on the closest scarp top are 2km distant.
<b>Local Plan Emerging Strategy context</b>	
Potential development and site capacity	The Emerging Strategy (November 2018) states that the site may be appropriate for up to 500 dwellings plus open space and 5ha of employment.
<b>Evidence provided by promoters</b>	
Evidence	Landscape and Visual Appraisal of Land Parcel PS19a, MHP Design Ltd, 7/8/19.
Comments	<p>This brief appraisal covers the main issues relating to the site. It appropriately identifies the intervisibility with the scarp and the rising land of the low ridge, also identifying the most sensitive parts of the site as the north east and north (Figure 9). The potential green infrastructure plan (Figure 10) puts forward a green buffer to the north and west, a wider buffer along the farm track running north of Stagholt Farm, and a copse on part of the eastern boundary, leaving a gap on the northern section of this boundary. The report suggests that the more sensitive eastern field could accommodate suitably designed employment uses and some housing of a more rural character, with high-density housing to the south and west. The location of different development types with associated access is not set out. This would be useful.</p> <p>The approach appears to place buildings on the highest part of the site to the north east, also closest to the sensitive receptors within the AONB. It is considered that the suggested lower density and more rural type of development would not adequately mitigate effects from elevated views in the AONB.</p>
<b>Past LVIA/Decisions</b>	
LVIA/decision	N/A
Comment	N/A
<b>Cotswolds AONB Conservation Board's response</b>	
Response summary/date	18 Jan 2019: The Board objects 'because the local planning authority has not complied with the requirement to give great weight to conserving and enhancing the landscape and scenic beauty of the AONB, which is adjacent to site 19b.'
Comments	Development on the site could be accommodated without harm to the landscape setting of the AONB providing the appropriate landscape infrastructure and layout approach is taken- especially addressing the sensitive areas to the north, north east and eastern parts. This is discussed above and below.

White Consultants

Outside AONB/1

Final/October 2019

Site review

Stroud Local Plan sites within or near Cotswolds AONB: landscape and visual review

<b>Natural England's response</b>	
Response summary/date	<p>22 Aug 2018: They note, in respect of Cotswolds Beechwoods SAC and the Severn Estuary SAC, SPA &amp; Ramsar Site 'Recreation pressure on relevant European Sites due to additional visitor pressure associated with the delivery of new homes in the JCS area and neighbouring authorities'. 'Symptoms of pressure may include: • Compaction and erosion of woodland soils • Trampling and erosion of associated ground flora • Physical disturbance of soils and flora through the creation of tracks and structures.' .... 'We advise that a case by case basis will be needed. Taking account of the recent People over Wind CJEU ruling we advise that residential development involving a net increase in dwellings within the zone of influence will need to be subject to appropriate assessment. If the relevant LPA is unable to conclude no adverse effect on the integrity of the SAC then planning permission should be refused.'</p> <p>18 Jan 2019: Natural England raises concerns over 'The AONB setting and scale of development.'</p>
Comments	<p>A Habitat Regulations Assessment of the Stroud Local Plan at Emerging Strategy Stage was prepared by Footprint Ecology in November 2018. This considered the implications of the Plan and site allocations for European wildlife sites in terms of any possible harm to habitats and species. A variety of buffers were devised to screen for potentially significant effects- 400m, 1km and variable buffers/mitigation zones- 7.7km for the Severn Estuary SAC, 5km for the Cotswolds Beechwoods SAC and 3km for Rodborough Common SAC. For potential site allocations within these areas appropriate detailed assessments including visitor surveys and potential mitigation strategies are proposed (by an appropriate ecological consultancy). Table 4 of the document sets out the screening for sites. This site is within 7.7km of the Severn Estuary SAC and so mitigation measures are required. The site is beyond the mitigation zones for Rodborough Common SAC and Cotswolds Beechwood SAC so detailed assessment and mitigation are not required.</p> <p>The concerns regarding AONB setting and scale of development are addressed above and below.</p>
<b>Councillors' response</b>	
Response summary/date	N/A
Comments	N/A
<b>Recommendations</b>	
Further information required	The location of different development types with associated access and revised green infrastructure proposals to reflect comments above.
Location/siting of development if relevant	It is recognised that the area forms an extension of Stonehouse northwards. However, this could be softened and integrated by appropriate planting as well as a sensitive approach to development pattern. A large amount of the north-east corner of the site should be planted as a woodland copse which should also be linked to, and cover, the steeper slopes adjacent the watercourse east of Stagholt Farm. This would ensure that the north eastern and eastern boundary planting forms a strong buffer to development, integrating it with the wider landscape. This would still allow for some development within the eastern parcel which could be of the lower density rural character described in the LVA, avoiding high buildings on the northern and eastern edges. Overall, this approach

Site review

Stroud Local Plan sites within or near Cotswolds AONB: landscape and visual review

	<p>of planting on higher land and steeper slopes should substantially mitigate the potential effects of development extending north from Stonehouse on views from the AONB. Other proposed buffers in MHP Figure 10 should be retained.</p> <p>The planting approach set out above would also avoid any argument of precedent for any development closer to the AONB to the east which would be much more exposed to view from the scarp.</p>
<i>Potential mitigation measures if relevant</i>	As above.
<i>Conclusions</i>	The Stroud Landscape Sensitivity Study identified this as a potential candidate site with provisos. Provided the above measures are taken, the site is considered suitable for housing and employment development. The SAC mitigation measures should also be defined and implemented.

61. The assessment provides significantly lower detail of analysis than the Illman Young report (referred to above) and therefore, though not in conflict, does not add sufficient detail to support a masterplan policy for PS19a/South Standish.

### Landscape Sensitivity Appraisal, (July 2013)

62. The Landscape Sensitivity appraisal (2013) supported the preparation of the Local Plan. In this, there was no assessment of Standish Parish. However, an assessment was undertaken of Strategic Site SA2/Great Oldbury. This was, before development started, a landscape similar to that in Standish which is immediately to the north of SA2/Great Oldbury.
63. The Assessment for this site (“West of Stonehouse”) is replicated in the box below.

3.11 PL 11 – West of Stonehouse Medium - Low Sensitivity Key characteristics & Justification:

- Gently undulating agricultural landscape consisting predominantly of larger pastoral fields which appear to have been consolidated within the north western extent of the PL with agricultural intensification;

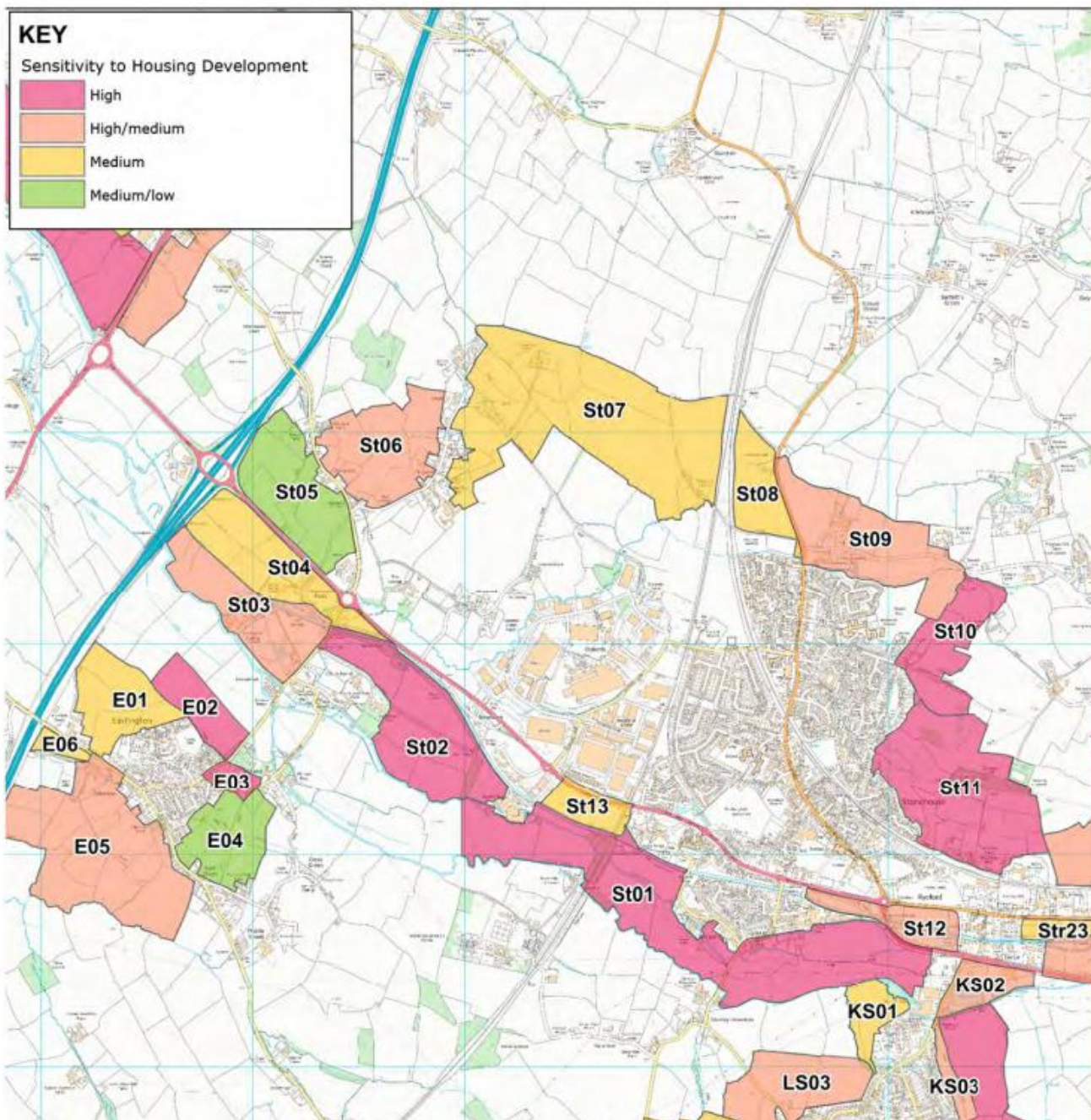
- Bound to the south by the A419 and Stroudwater Business Park and to the East by the Bristol-Birmingham Railway Line;
- Agricultural context is eroded by the presence of road and rail corridors and large industrial scale buildings associated with the Business park within the southern and eastern extents of the site;
- Generally, tree cover and tall hedgerows provide a degree of visual containment although there remains a strong visual connection with adjacent Business Park and residential edge of Stonehouse. Within most locations there is also a strong visual association with the elevated Cotswolds uplands to the east, particularly Doverow Hill;
- Hedgerows in some locations appear degraded and generally landscape elements are in moderate condition;
- Receptors primarily consist of users of the PRoWs, residents of adjacent farmsteads and users of local roads/M5 and rail corridor;
- Tranquillity heavily degraded by large industrial units, housing and the influence of road and railway infrastructure which is audible within most locations;
- Numerous PRoW suggest the agricultural landscape has amenity value. Relevant designations:
  - AONB – 0.5km to the east;
  - TPOs – Numerous individual TPOs and a Group TPO within the eastern extent of the PL;
  - Ancient Woodland - Within 500m of Mole Grove ;
  - Listed Buildings – several within the PL and within close proximity; • Conservation Area – Adjacent to Industrial Heritage Conservation Area;
  - PRoW - Numerous footpaths and 2 bridleways within site boundary.

## Landscape Sensitivity Assessment, (December 2016)

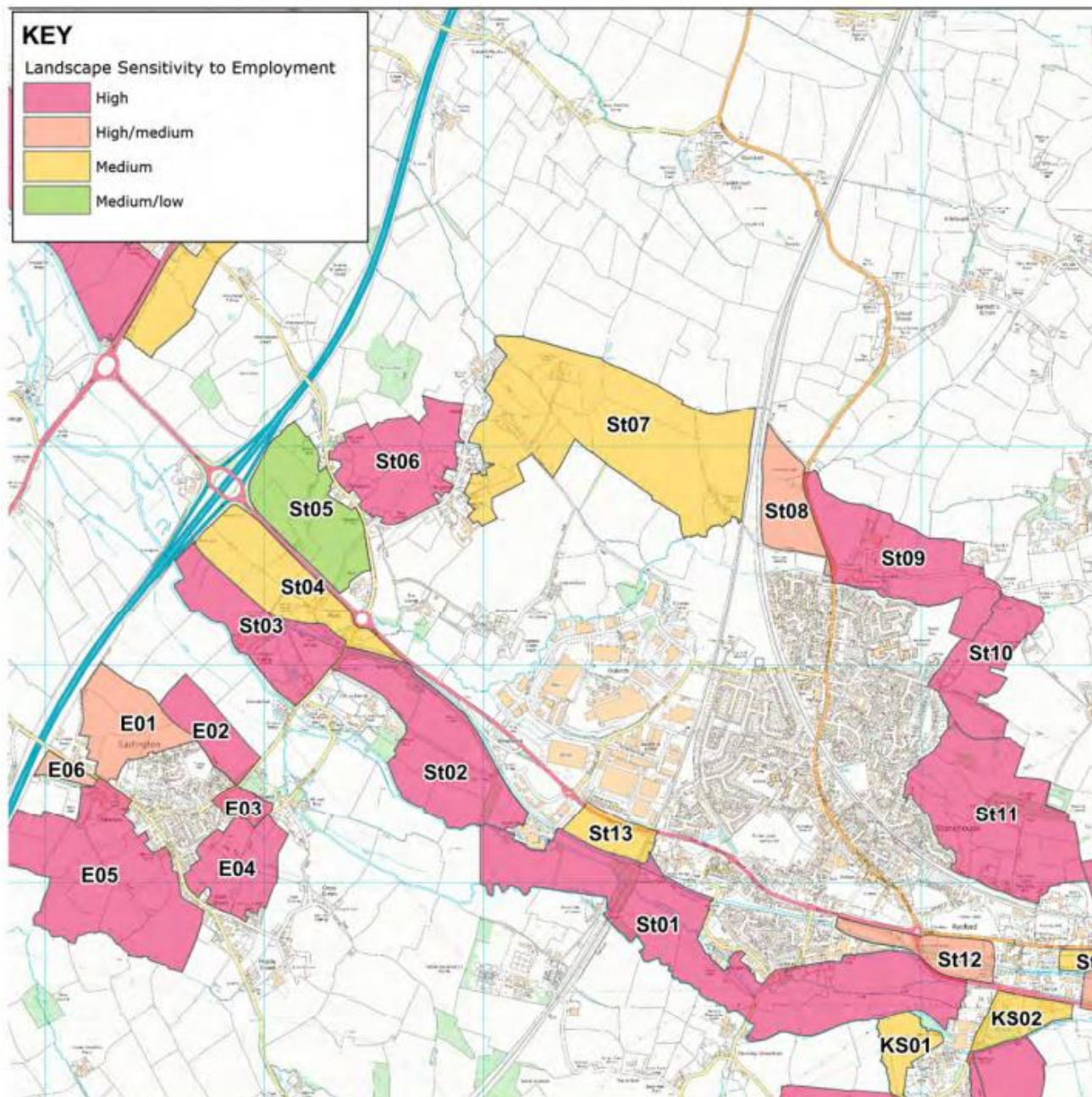
64. The December 2016 Landscape Sensitivity Assessment has been prepared in support of the Emerging Local Plan. It specifically considers the landscape impact of potential development on proposed sites PS19a/South Standish which was discussed in the Planning Policy Context evidence paper. The analysis showed is set out in the table below. The full text of the assessments are replicated following:

	Sensitivity to housing development	Sensitivity to economic development
PS19a (ST07)	medium	medium











Land Parcel Reference: St07	Settlement: Stonehouse
<b>LANDSCAPE SENSITIVITY</b>	
<i>Sensitivity to Housing Use</i>	Medium
<i>Summary</i>	
<p>The sensitivity of the area lies in the rising slopes to the north east which contain the lower landscape including Stonehouse to the south, its contribution to the setting of the linear rural settlement of Nupend including listed buildings, the watercourse and associated riparian corridor, the openness of the land parcel and its intervisibility with the escarpment to the east. The value of the area lies in the many PROWs, especially to the West and the listed buildings in Nupend . Housing would definitely extend the current settlement form and if implemented on the rising slopes to the north may become visible further north. Housing could be implemented on the lower areas to the East but should avoid adversely affecting the watercourse corridor and surrounding Nupend or affecting its setting and character. Consideration should be given to potentially implementing this with nearby sites to create a more coherent and integrated settlement form on the northern edge of Stonehouse.</p>	
<i>Sensitivity to Employment Use</i>	Medium
<i>Summary</i>	
<p>The sensitivity of the area lies in the rising slopes to the north east which contain the lower landscape including Stonehouse to the south, its contribution to the setting of the linear rural settlement of Nupend including listed buildings, the watercourse and associated riparian corridor, the openness of the land parcel and its intervisibility with the escarpment to the east. The value of the area lies in the many PROWs, especially to the West and the listed buildings in Nupend . Employment in this location would conflict with the scale and character of Nupend and its surroundings and may conflict with proposed site allocation to the South. However, subject to this, the land is relatively flat and open to the East and it could be implemented on the lower land to the south east. Consideration should be given to potentially implementing this with nearby sites with a mix of uses to create a more coherent and integrated settlement form on the northern edge of Stonehouse.</p>	
<b>KEY CHARACTERISTICS AND FACTORS</b>	
<i>Landform/water bodies</i>	Gentle slopes rising to a low ridge to the north east.
<i>Landcover pattern/use/ elements</i>	Semi-regular fields, small-medium to the west and large to the east. Correspondingly fields tend to be pastoral to the west and arable to the east. Field boundaries are a mix of trimmed and outgrown hedges. Trees are located along the northern boundary and occasionally on other hedges and along the watercourse to the south east.
<i>Settlement pattern within parcel</i>	Two small farm complexes at Pidgemore Farm and Stagholt Farm and part of the linear rural settlement at Nupend.
<i>Landscape features</i>	None
<i>Landscape condition/ intensity of use</i>	Condition is moderate and the intensity of use is high/moderate for the arable land and moderate for pastoral land.
<i>Intervisibility/openness/enclosure</i>	The pastoral area to the west is generally enclosed with trees and hedges whilst the arable area to the east is more open. The area is intervisible with the escarpment to the east.
<i>Skyline</i>	The trees and hedge on the north eastern boundary act as local skyline in some views.
<i>Key views</i>	From PROWs, the escarpment and from the adjacent railway.
<i>Detractors</i>	None
<i>Tranquillity</i>	The area is moderately tranquil , although the noise of the M5 to the West and the railway to the East reduce this to an extent.
<i>Settlement edge character</i>	N/A as adjacent to the allocated sites, not the existing Stonehouse edge.
<i>Functional and/or visual relationship between the area and the settlement/key features</i>	The area forms part of gently sloping rural lower valley slopes which form the transitional landscape between Severn Vale and the Escarpment east. The area to the west contributes to the setting of the linear rural settlement of Nupend. The low hill of which the north eastern field forms a part acts as a visual and physical separation between Stonehouse and the unspoilt countryside to the north. PROWs adjacent enjoy the openness of the area and the views to the escarpment.
<i>Potential visual receptors</i>	Users of PROWs, railway, and residents. Also, potentially, walkers on Escarpment.
<b>CONSTRAINTS/DESIGNATIONS</b>	

<i>Landscape</i>	None
<i>Historic</i>	Listed buildings in Nupend.
<i>Biodiversity</i>	None
<i>Other (floodplain, PROWs)</i>	PROWs cross the area, especially to the west.

#### LANDSCAPE CONTEXT

<i>National Character Area</i>	Severn and Avon Vales
<i>Stroud District LCA Landscape Character Type</i>	Escarpment foot slopes
<i>County/AONB LCA Landscape Character Type</i>	Settled Unwooded Vale
<i>HLC type</i>	A2

Land Parcel Reference: St08 Settlement: Stonehouse	
<b>LANDSCAPE SENSITIVITY</b>	
<i>Sensitivity to Housing Use</i>	Medium
<i>Summary</i>	
<p>The sensitivity of the area lies in the rising slopes to the north which contain the lower landscape including Stonehouse to the south, the watercourse and associated riparian corridor, the openness of the land parcel and its intervisibility with the escarpment to the east. The value of the area lies in the adjacent PROWs. Housing would definitely extend the current settlement form and if implemented on the rising slopes to the north may become visible further north as well as looking awkward in the wider landscape. Housing could be implemented on the lower field to the south with the watercourse and associated vegetation acting as a natural boundary. Consideration should be given to potentially implementing this with nearby sites to create a more coherent and integrated settlement form on the northern edge of Stonehouse.</p>	
<i>Sensitivity to Employment Use</i>	High/medium
<i>Summary</i>	
<p>The sensitivity of the area lies in the rising slopes to the north which contain the lower landscape including Stonehouse to the south, the watercourse and associated riparian corridor, the openness of the land parcel and its intervisibility with the escarpment to the east. The value of the area lies in the adjacent PROWs. Employment use would definitely extend the current settlement form and if implemented on the rising slopes to the north may become visible further north as well as looking awkward in the wider landscape. Employment in this location may conflict with the essentially residential character of the adjacent settlement and is located away from the main commercial area. However, the land is relatively flat and it could be implemented on the lower field to the south with the watercourse and associated vegetation acting as a natural boundary. Consideration should be given to potentially implementing this with nearby sites with a mix of uses to create a more coherent and integrated settlement form on the northern edge of Stonehouse.</p>	
<b>KEY CHARACTERISTICS AND FACTORS</b>	
<i>Landform/water bodies</i>	Very gently sloping southern field running down to a watercourse. The northern field rises more steeply from the watercourse to a high point in the northern corner and is part of a low rise north of the settlement.
<i>Landcover pattern/use/ elements</i>	Semi-regular medium to large-size fields down to ley and arable use. The fields are bounded by a mix of trimmed and outgrown hedges with some trees, and trees and vegetation along the intervening watercourse.
<i>Settlement pattern within parcel</i>	Single rural house.
<i>Landscape features</i>	Watercourse.
<i>Landscape condition/ intensity of use</i>	High/moderate condition and intensity of use as arable land.
<i>Intervisibility/openness/enclosure</i>	The lower field is enclosed by the railway embankment to the west and is low-lying but open to view from the B4008 and from the escarpment to the east. The upper field is screened to an extent by a strong hedge to the west but the top edge is near the top of the low hill. It is also open to view from the B4008 and from the escarpment to the east.
<i>Skyline</i>	The trees and hedge on the northern boundary act as local skyline in some views.
<i>Key views</i>	From PROWs and B4008 adjacent to the area, from the escarpment and from the adjacent railway.
<i>Detractors</i>	Railway embankment.
<i>Tranquillity</i>	Tranquillity is limited by the adjacent road and rail corridors.
<i>Settlement edge character</i>	20c linear settlement edge is mitigated by the adjacent allotment Gardens, recreation ground and stream vegetation.
<i>Functional and/or visual relationship between the area and the settlement/key features</i>	The area forms part of gently sloping rural lower valley slopes which form the transitional landscape between Severn Vale and the Escarpment east. The low hill of which the northern field forms a part acts as a visual and physical separation between Stonehouse and the unspoilt countryside to the north. PROWs adjacent enjoy the openness of the area and the views to the escarpment.
<i>Potential visual receptors</i>	Users of PROWs, B4008 and railway, and residents. Also, potentially, walkers on Escarpment.

**CONSTRAINTS/DESIGNATIONS**

<i>Landscape</i>	None
<i>Historic</i>	None
<i>Biodiversity</i>	None
<i>Other (floodplain, PROWs)</i>	None

**LANDSCAPE CONTEXT**

<i>National Character Area</i>	Severn and Avon Vales
<i>Stroud District LCA Landscape Character Type</i>	Escarpment foot slopes
<i>County/AONB LCA Landscape Character Type</i>	Settled Unwooded Vale
<i>HLC type</i>	A2



## Green Infrastructure

### Stroud District Open Space and Green Infrastructure Study (June 2019)

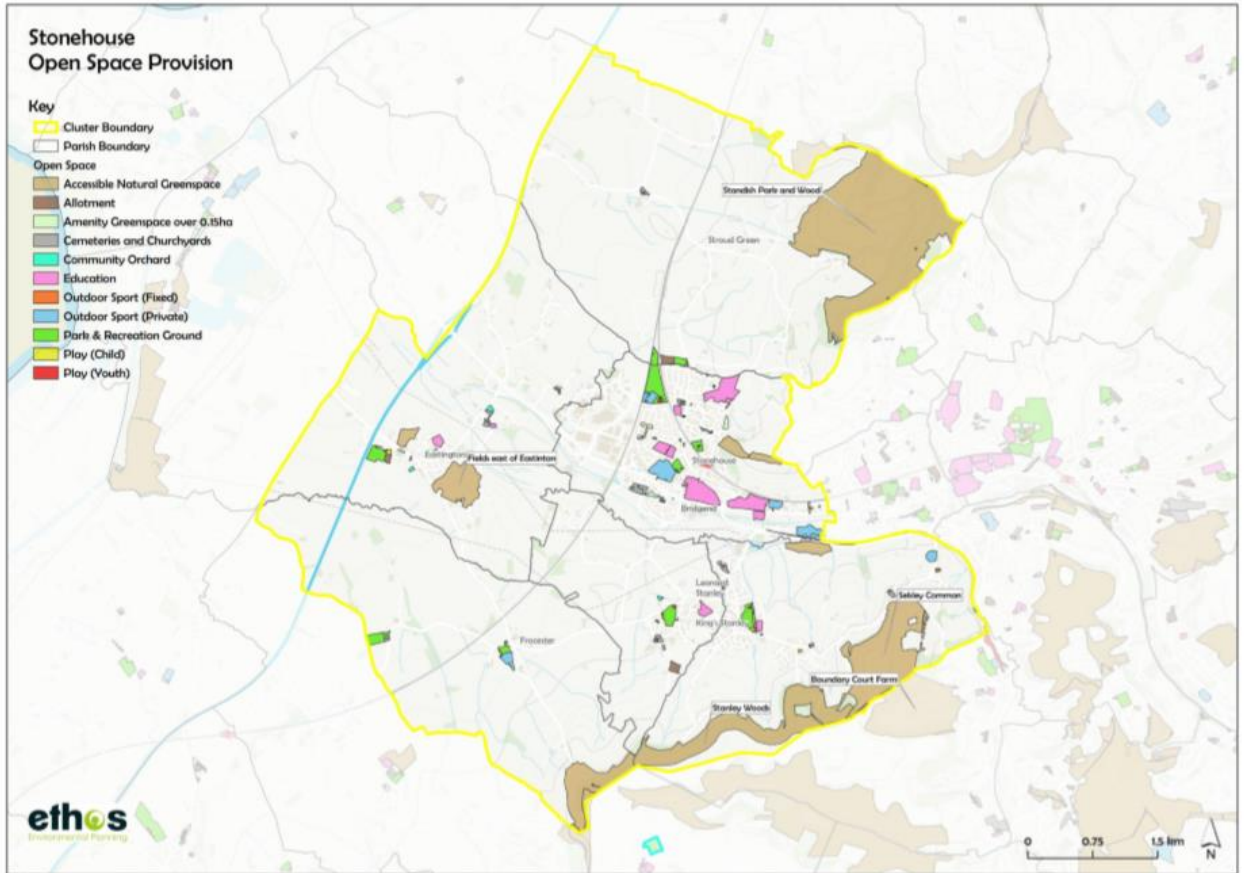
65. Standish Parish is located in the Stonehouse study area. Detailed consideration of the study area is set out in the Stonehouse Cluster Sub Area Analysis Report (June 2019). The extent of the Study Area (showing the relative position of Standish) is set out here.



Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 2

66. The report undertook an analysis of existing provision. In Standish, there is no provision other than accessible Natural Greenspace to the north east of the parish, and a small amount of park and recreation on the southern parish boundary.

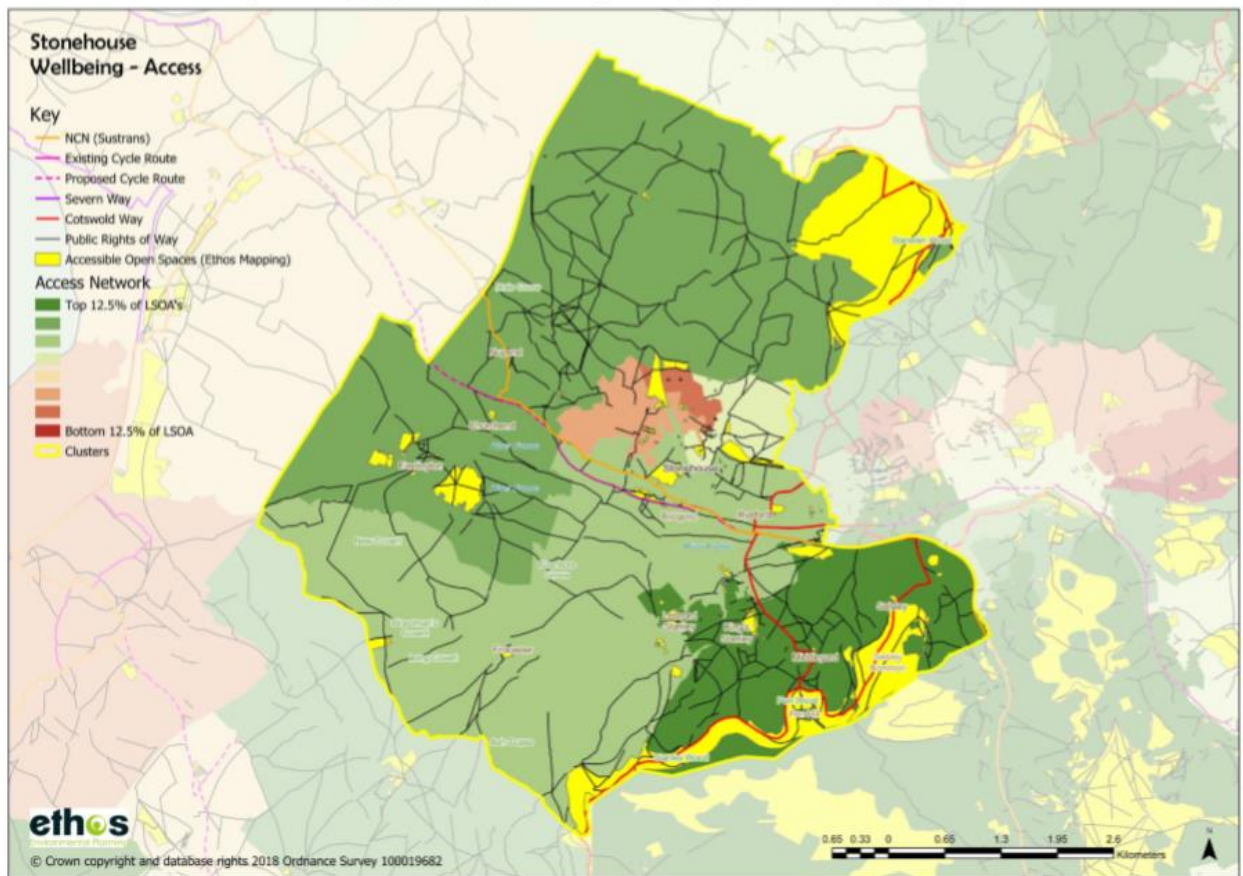
Figure 2 Overview of open space in the Stonehouse cluster



Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 4

67. Standish Parish is identified as having high accessibility to open spaces, PROW and walking and cycling routes.

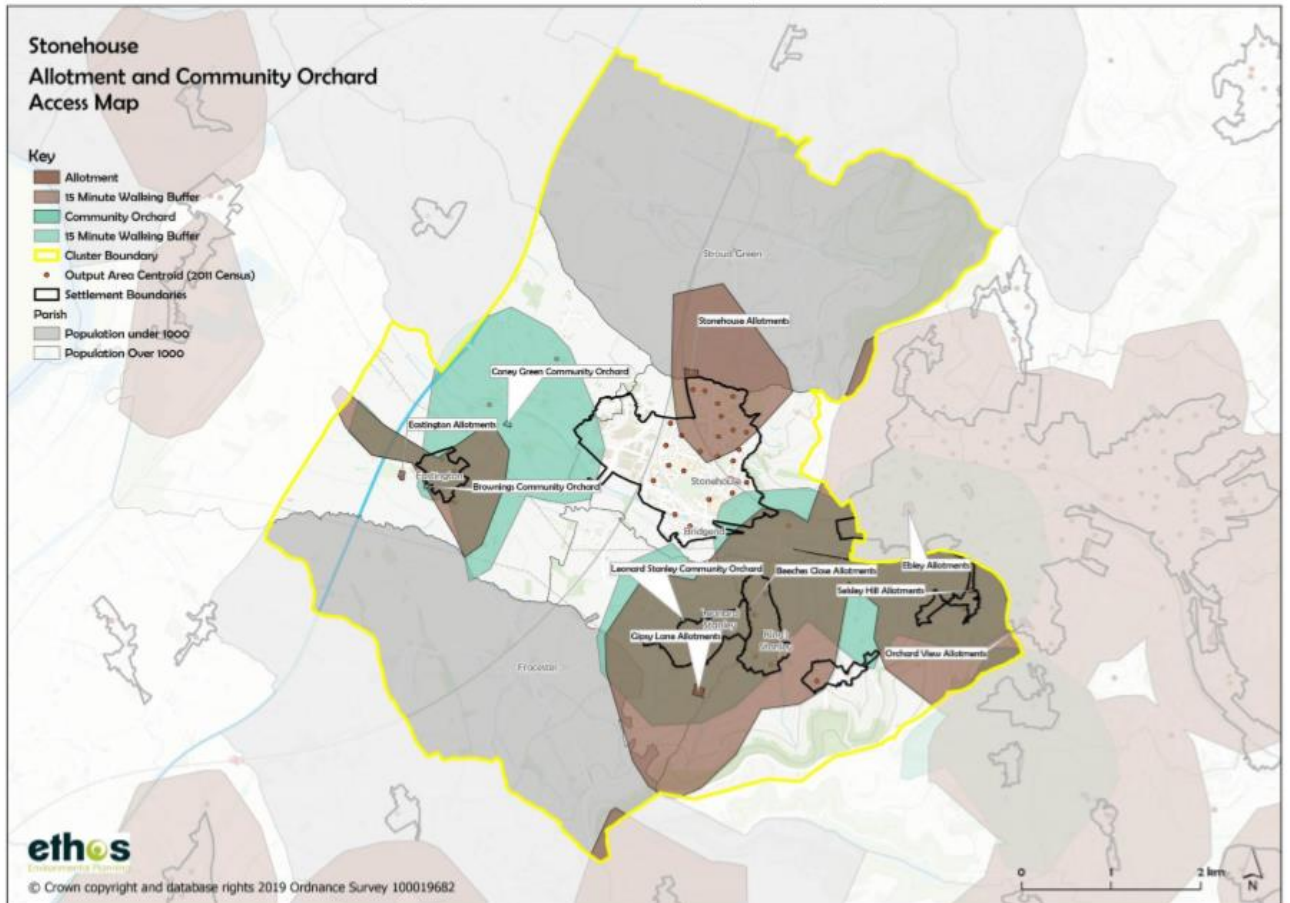
Figure 8 Mapping of GI Network by Theme: Wellbeing: Accessible open space, PROW and key walking and cycling routes



Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 10

68. An undersupply of allotments was identified for the study area and for land subject to emerging strategic allocation 19a/South Standish.

Figure 9 Access to allotments and community orchards (15 minutes' walk time)

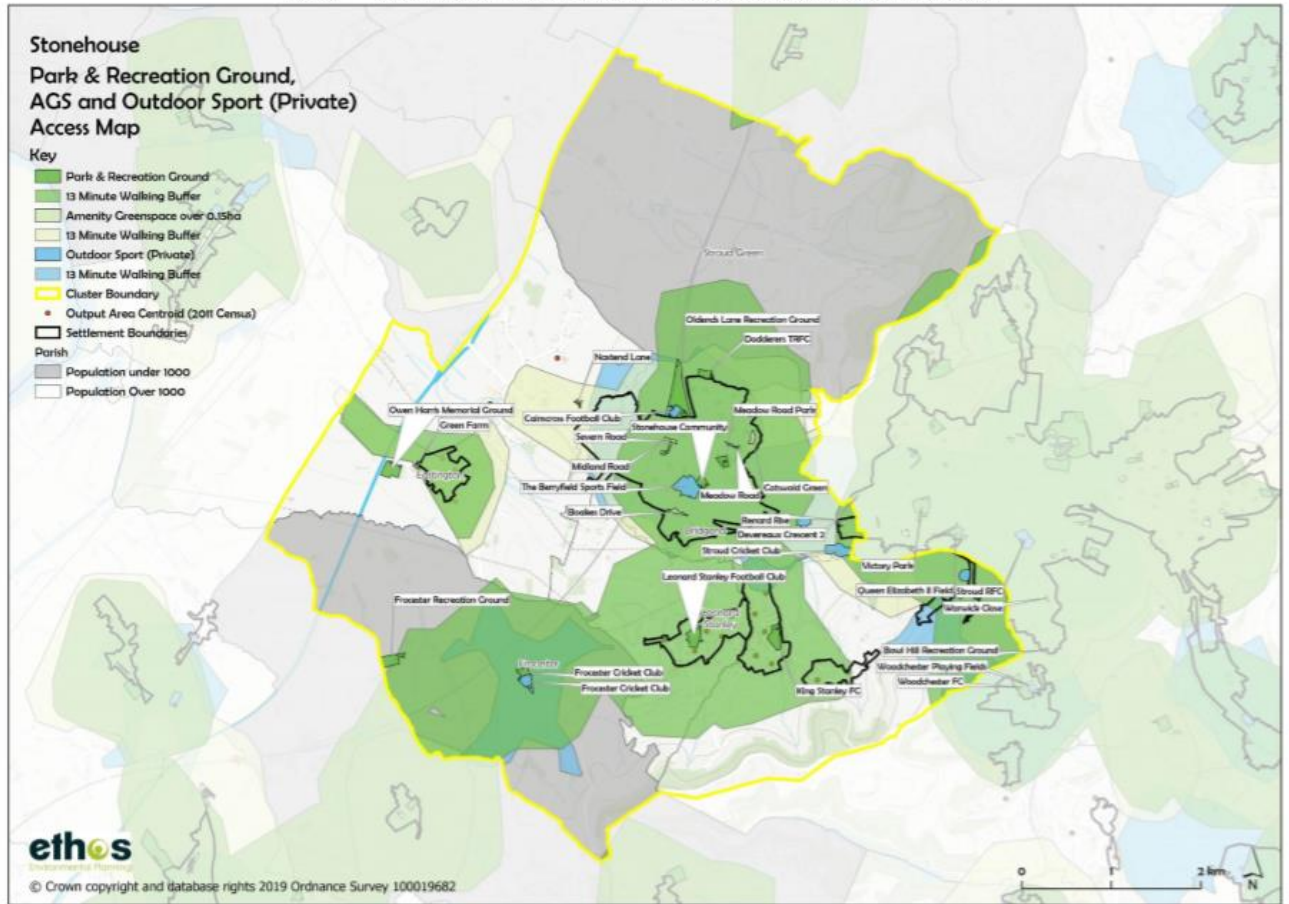


Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 14

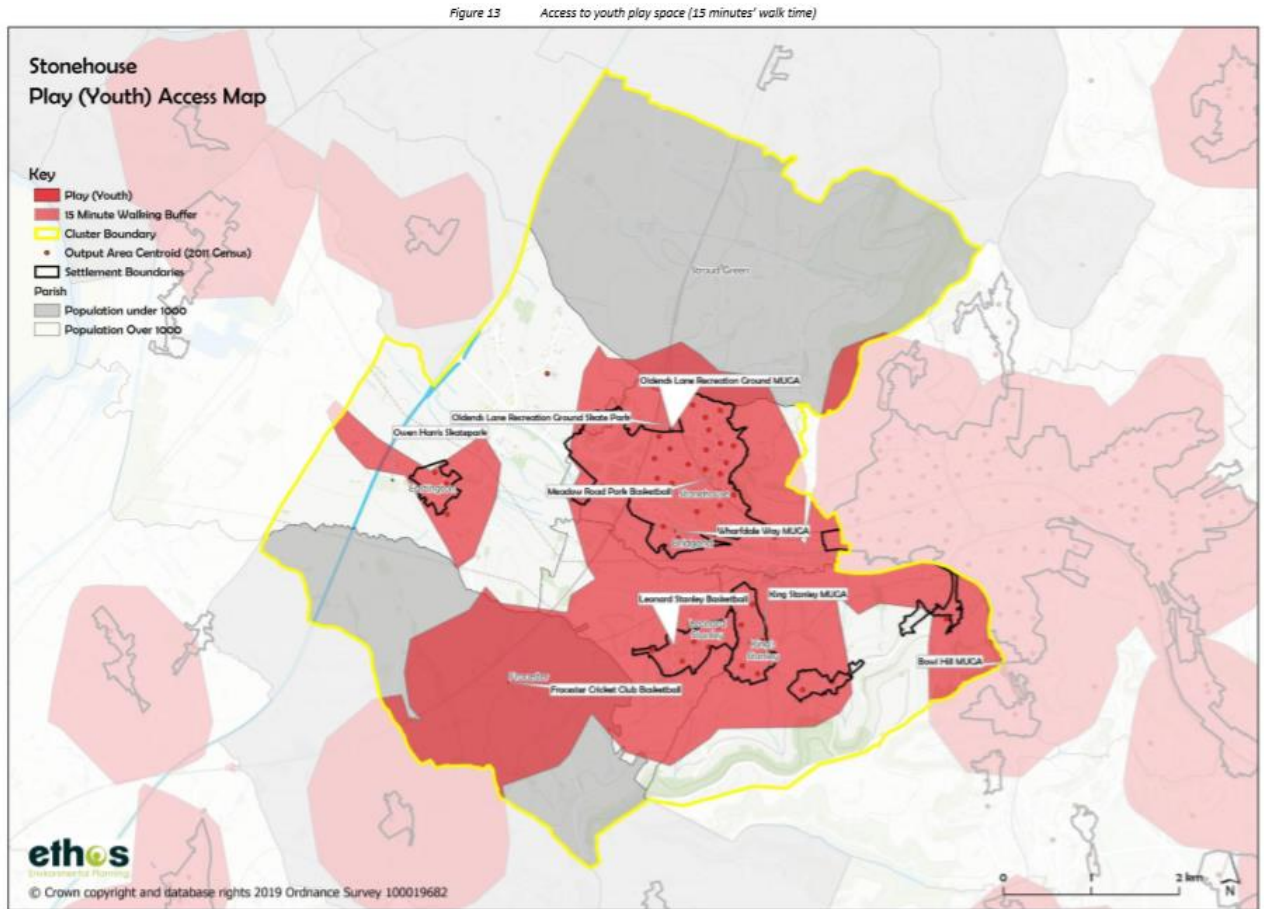
69. Part of proposed strategic allocation PS19a/South Standish would have insufficient access to parks and recreational grounds, indicating that new provision will be required. There is also insufficient access to children’s play areas and youth access areas.



Figure 11 Access to parks and recreation grounds, amenity green space and outdoor sport private (13 minutes' walk time)



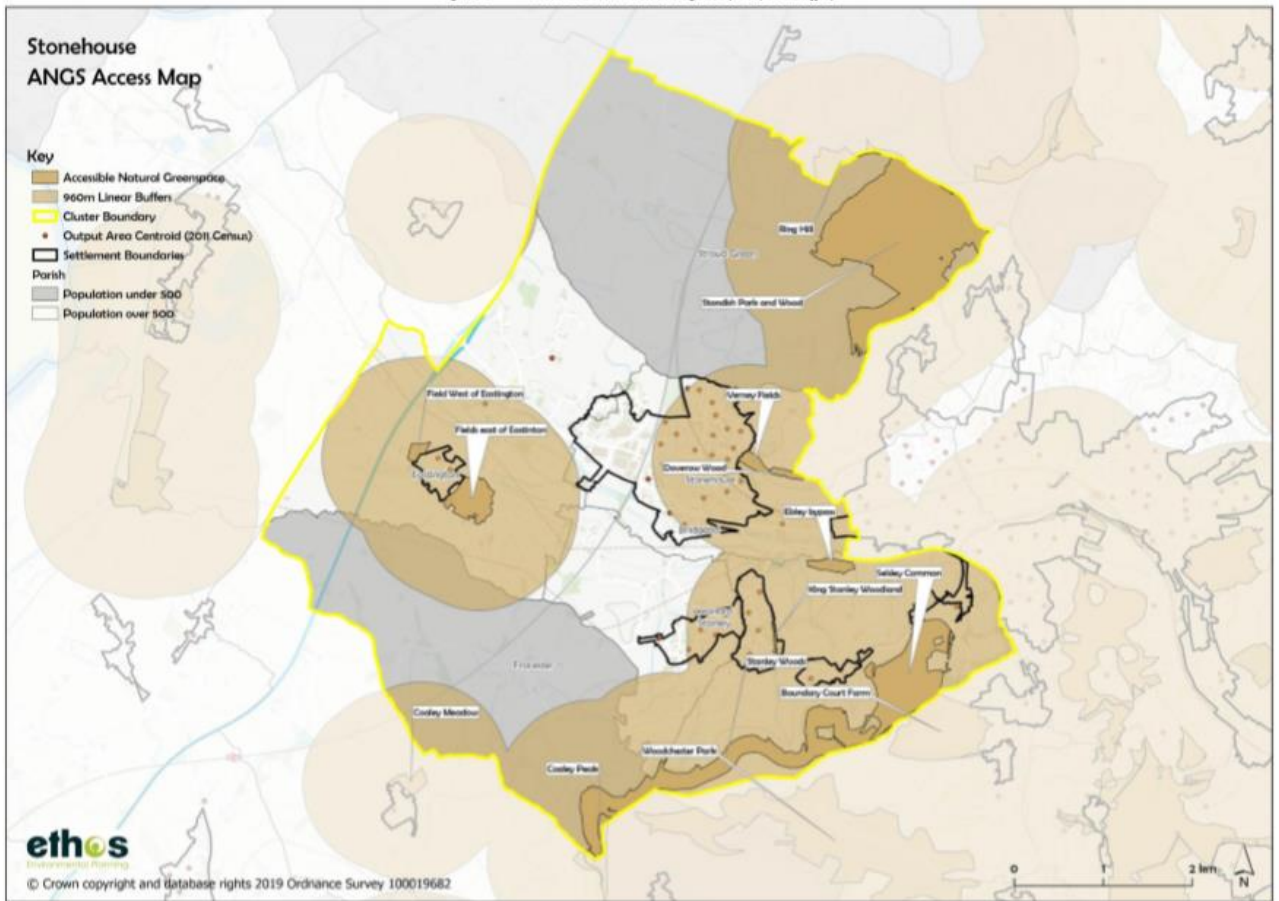
Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 16



Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 17

70. In addition, proposed PS19a/South Standish would not have sufficient access to Accessible Natural Greenspace within a 960 linear metre buffer.

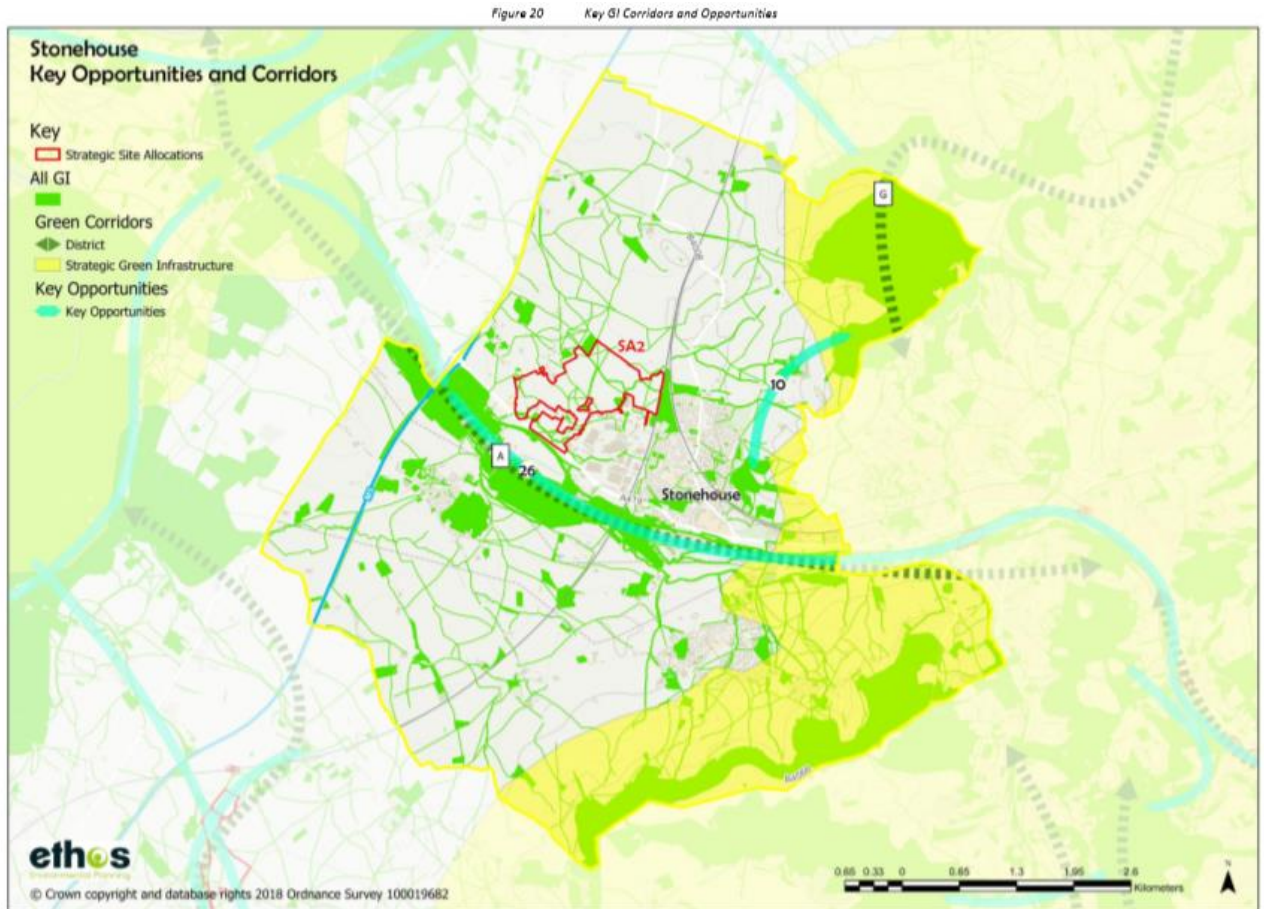
Figure 14 Access to accessible natural green space (960m buffer)



Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 19

71. The study does not propose any key opportunities for Standish Parish.



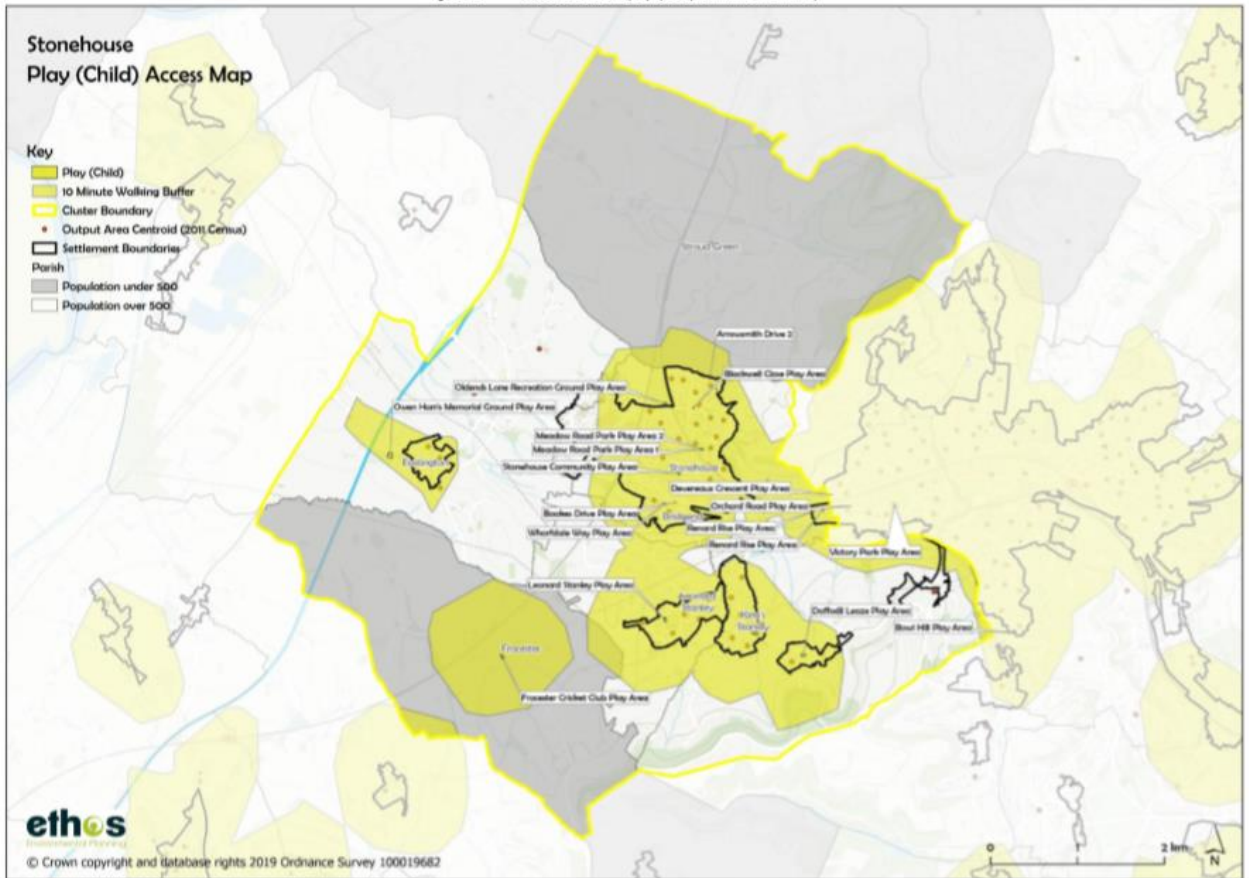


Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 40

72. The Green Infrastructure study would indicate that, for the proposed Strategic Allocation, the proposal should include provision of allotments, parks and recreation grounds, children’s play areas, youth access and Accessible Natural Greenspaces to meet identified under-provision.



Figure 12 Access to children's play space (10 minutes' walk time)



Source: Stonehouse Cluster Sub Area Analysis Report (June 2019), page 17

## AONB

### Cotswolds Area of Outstanding Natural Beauty Management Plan 2018-2023

73. The extent of the Cotswolds AONB is replicated below, taken from the management plan. As shown in **Figure 7**, Standish sits on the western edge of the AONB. **Figure 8** shows the extent of the AONB.

Figure 7: Standish Parish in relation to the AONB

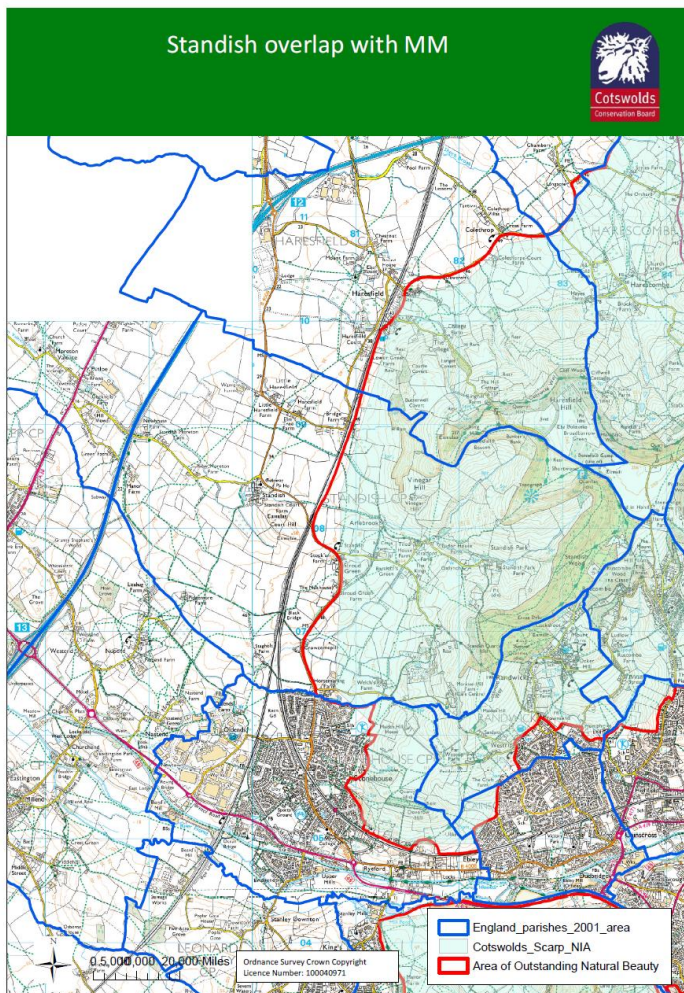


Figure 8: Full extent of Cotswolds AONB

## Map of the Cotswolds Area of Outstanding Natural Beauty



2 Cotswolds Area of Outstanding Natural Beauty

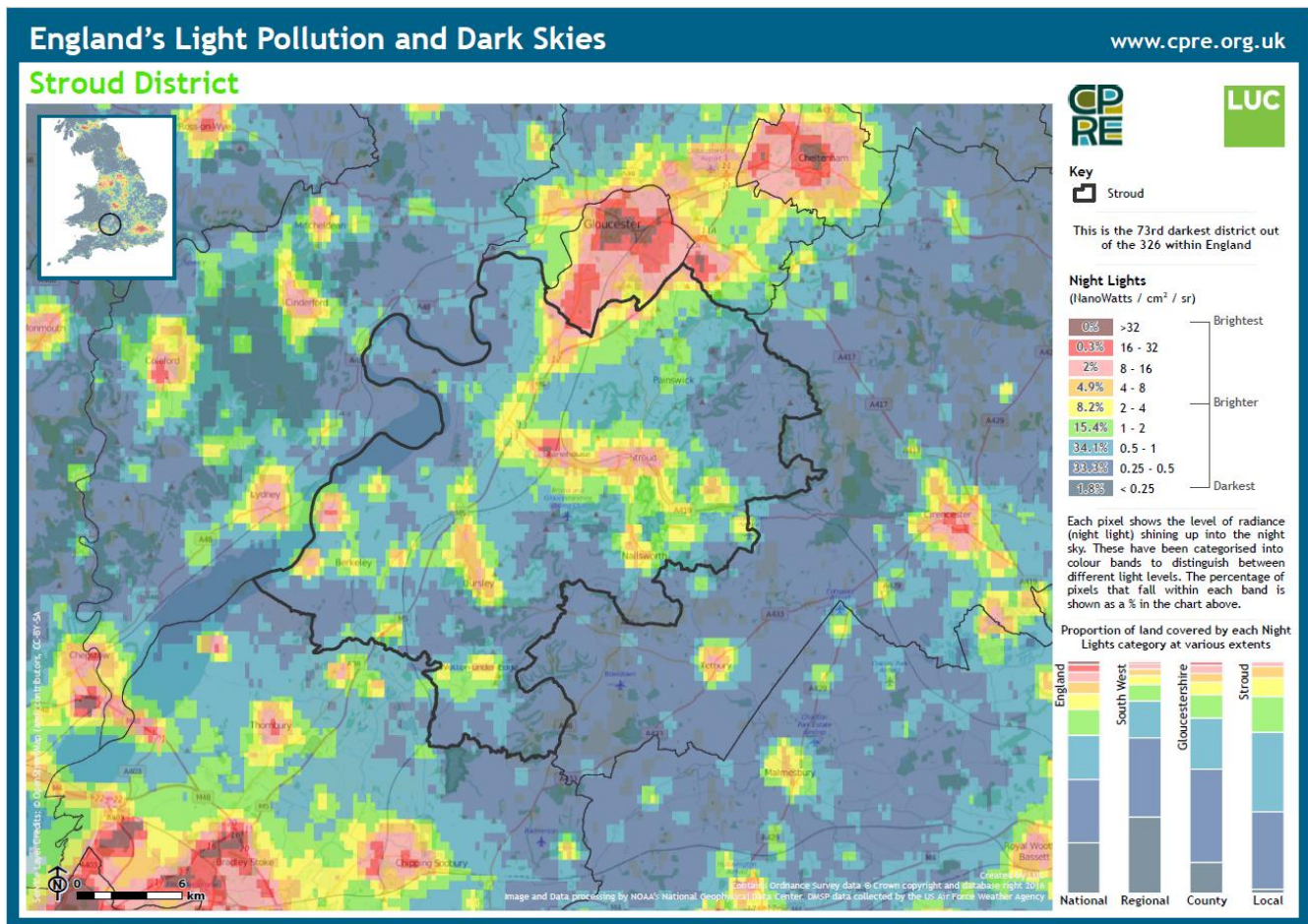
74. The Cotswolds AONB Management Plan contains a number of policies to which local planning authorities and neighbourhood plans must pay regard.
75. Policy CE1, requires that new development within the AONB, or having an impact upon it, should have regard to the scenic quality of the location and ensure that views, including those into and out of the AONB and visual amenity, are conserved and enhanced.
76. Policy CE10 requires that Neighbourhood Plans should explicitly identify the Cotswolds AONB Management Plan as a material consideration.
77. Policy UE2 requires that there should be a safe, pleasant, accessible, clearly waymarked and well connected Public Rights of Way network that should be maintained, enhanced and promoted across the Cotswolds AONB. Sustainable funding for National Trails, including the Cotswold Way and Thames Path, should be secured. Visitors, residents and local communities should be provided with opportunities to increase their understanding and enjoyment of the special qualities of the Cotswolds AONB. Communities from the surrounding urban areas, particularly those from deprived wards and those who do not traditionally visit the AONB, should be a priority for engagement.
78. Policy UE3 seeks to increase the provision of: walking, cycling and riding routes, including easy access routes for the disabled; opportunities to access and interact with nature; and volunteering and personal development opportunities.



## Dark Skies, CPRE, 2015

79. The Campaign to Protect Rural England (CPRE) prepared an assessment of night-time light pollution for Stroud District, shown in **Figure 9**. The interactive map was produced with satellite images captures at 1.30 am throughout September 2015. NOTE: This was before the construction of the Javelin Park Incinerator.

Figure 9: Stroud night-time light pollution



80. An excerpt of the Stroud light pollution assessment for Standish Parish is shown in **Figure 10**. It shows that for most of the parish, away from built up areas and the motorway, Standish Parish is 34.1% nano watts/cm<sup>2</sup>/sr. Stroud is the 73/326 darkest district in England and Standish is one of the darkest parts of Stroud. The level of night-time darkness in Standish Parish is also very consistent across the Parish.

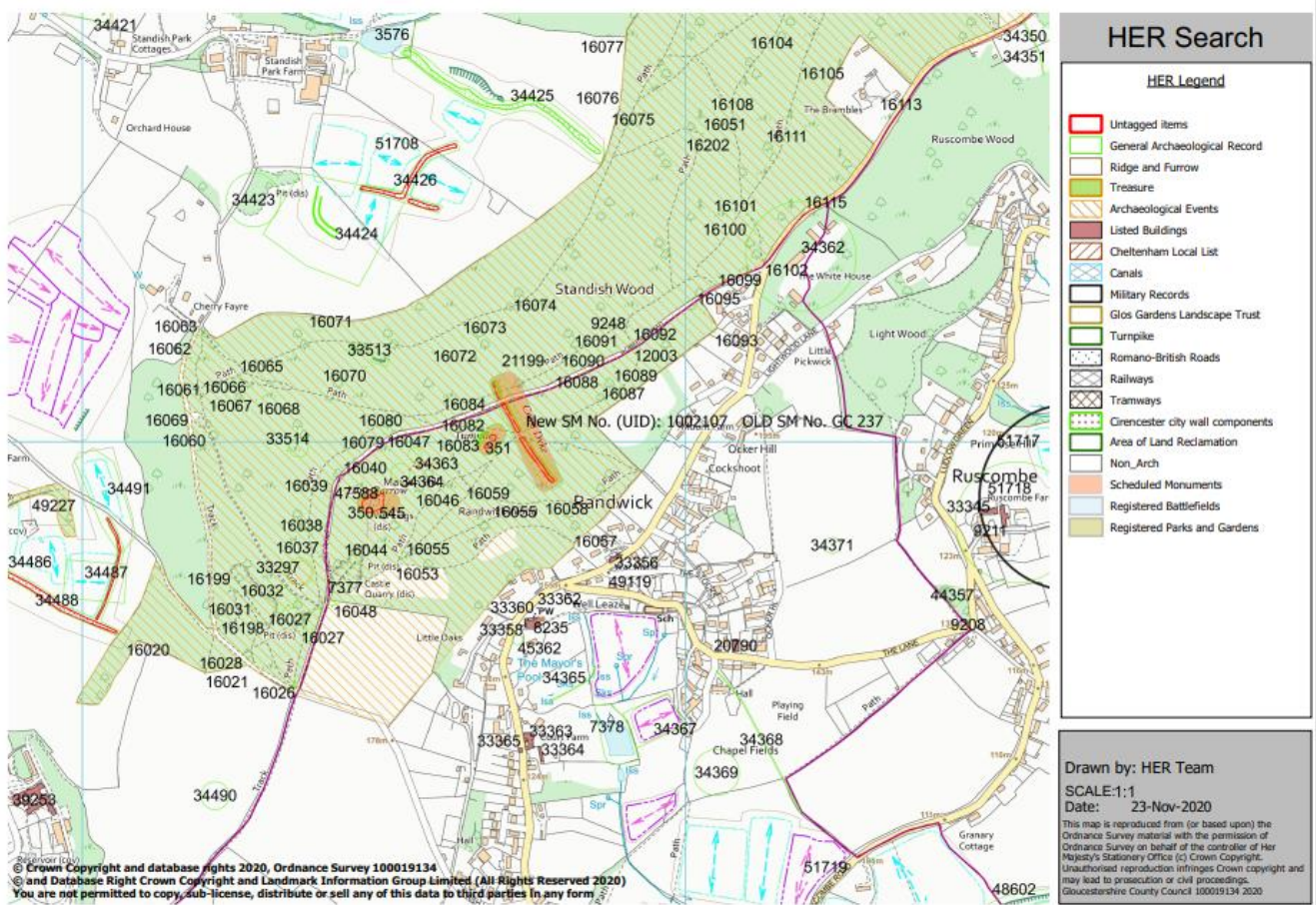
81. Night-time dark skies in the Standish countryside are an aspect of its character that would be under threat from new development. CPRE recommends that existing dark skies are protected and that new developments do not increase local light pollution.

Figure 10: Dark Skies Standish Parish Inset



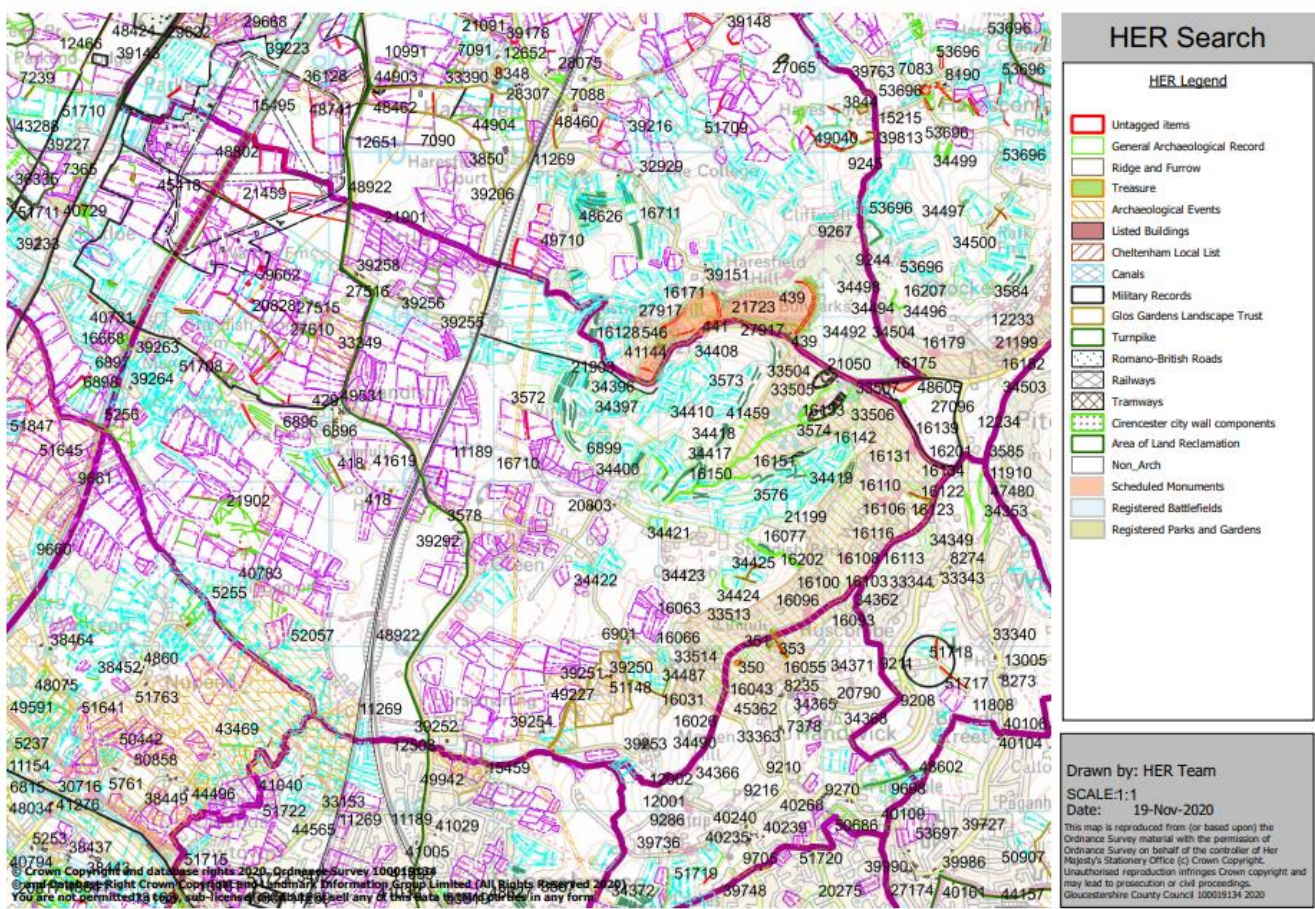
## Gloucestershire Historic Environment Record (HER)

82. The HER was consulted in November 2020 and three records for scheduled monuments were identified within Standish parish. They are HER 353 Iron Age cross dyke, HER 418 two bowl barrows on Court Hill and HER 429 gatehouse to manor house complex of the Abbot of Gloucestershire<sup>1</sup>.

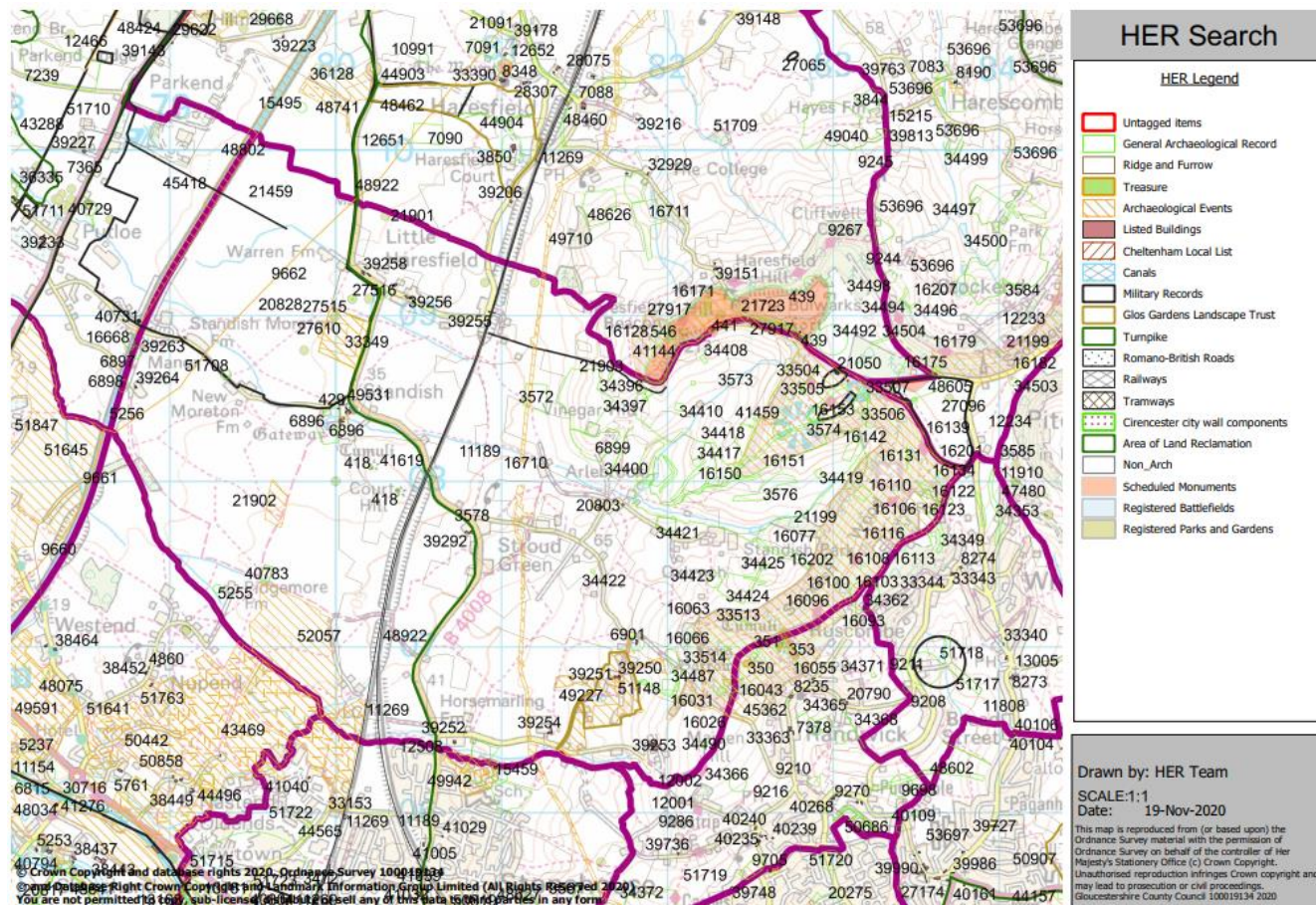


<sup>1</sup> Email from Anna Morris Archaeologist, Archaeology Service, Shire Hall, Gloucester, GL1 2TH, 26/11/2020.

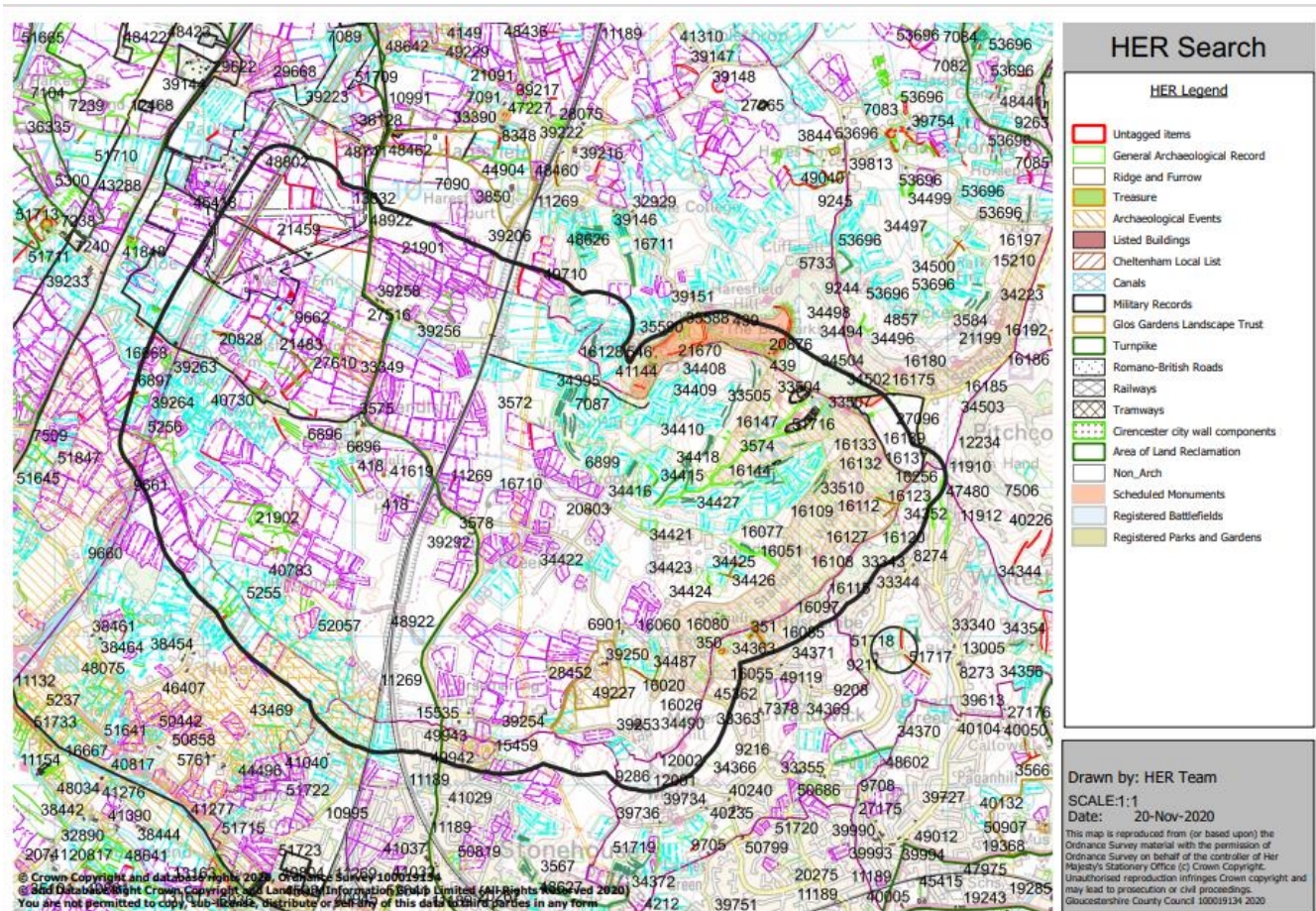












## Historic Environment Record (HER) - Area Summary Report

Gloucestershire Historic Environment Record (HER)

Summary Report for Area 353

Name A scheduled Iron Age Cross Dyke is located at Randwick Hill, Randwick.  
 Status SAM237  
 Grid Ref 382500 206900  
 Parish STANDISH  
 Map Sheet SO80NW

HER 353 DESCRIPTION:-

### Scheduled Monument Description -

Long barrow, two bowl barrows and a cross dyke 525m south east of Cherry Fayre.

Reasons for Designation

Long barrows were constructed as earthen or drystone mounds with flanking ditches and acted as funerary monuments during the Early and Middle Neolithic periods (3400-2400 BC). They represent the burial places of Britain's early farming communities and, as such, are amongst the oldest field monuments surviving visibly in the present landscape. Where investigated, long barrows appear to have been used for communal burial, often with only parts of the human remains having been selected for interment. Certain sites provide evidence for several phases of funerary monument preceding the barrow and, consequently, it is probable that long barrows acted as important ritual sites for local communities over a considerable period of time. Some 500 examples of long barrows and long cairns, their counterparts in the uplands, are recorded nationally. As one of the few types of Neolithic structure to survive as earthworks, and due to their comparative rarity, their considerable age and their longevity as a monument type, all long barrows are considered to be important.

Bowl barrows, the most numerous form of round barrow, are funerary monuments dating from the Late Neolithic period to the Late Bronze Age, with most examples belonging to the period 2400-1500 BC. They were constructed as earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or grouped as cemeteries and often acted as a focus for burials in later periods. Often superficially similar, although differing widely in size, they exhibit regional variations in form and a diversity of burial practices. Often occupying prominent locations, they are a major historic element in the modern landscape and their considerable variation of form and longevity as a monument type provide important information on the diversity of beliefs and social organisations amongst early prehistoric communities. They are particularly representative of their period.

Cross dykes are substantial linear earthworks typically between 0.2km and 1km long and comprising one or more ditches arranged beside and parallel to one or more banks. They generally occur in upland situations, running across ridges and spurs. They are recognised as earthworks or as cropmarks on aerial photographs, or as combinations of both. The evidence of excavation and analogy with associated monuments demonstrates that their construction spans the millennium from the Middle Bronze Age, although they may have been re-used later. Current information favours the view that they were used as territorial boundary markers, probably demarcating land allotment within communities, although they may also have been used as trackways, cattle droveways or defensive earthworks. Cross dykes are one of the few monument types which illustrate how land was divided up in the prehistoric period. They are of considerable importance for any analysis of settlement and land use in the Bronze Age. Very few have survived to the present day.

Despite visitor erosion, tree growth and partial early excavation the long barrow, two bowl barrows and a cross dyke 525m south east of Cherry Fayre survive comparatively well and will contain archaeological and environmental evidence relating to their construction, longevity, social organisation, territorial significance, funerary and ritual practices, interrelationships, relative chronologies and overall landscape context.

History

See Details.

Details

This record was the subject of a minor enhancement on 24 September 2015. The record has been generated from an "old county number" (OCN) scheduling record. These are monuments that were not reviewed under the Monuments Protection Programme and are some of our oldest designation records.

The monument, which falls into three separate areas of protection, includes a long barrow, two bowl barrows and a cross dyke situated on the summit of a prominent ridge which is part of the Cotswold Escarpment and forms the watershed between the valleys of the Ruscombe Brook and a tributary to the River Severn and

overlooks the Vale of Gloucester. The long barrow survives as a roughly rectangular mound orientated ENE to WSW measuring up to 45.7m long, 26.2m wide and 4.5m high. The side ditches are preserved as entirely buried features. Excavated in 1883 it was found to have a "horned" entrance and a chamber defined by drystone walls at the eastern end. The chamber contained at least seven skeletons and above these a Roman horse shoe and Roman pottery were recovered. The barrow mound was found to be surrounded by a retaining drystone wall and several crouched inhumations were discovered beside this wall on the south side of the mound.

The bowl barrows survive as circular mounds of between 8m and 9m in diameter and from 0.6m up to 0.9m high surrounded by visible quarry ditches from which the construction material was derived. One has a slight central depression. The cross dyke is a linear earthwork bank and adjacent ditch measuring up to 200m long, the bank is up to 0.7m high and the ditch approximately 0.6m deep {Source Work 2873.}

[The site is scheduled as part of a group along with a nearby long barrow and two round barrows.]

Dyke - Cross ridge linear earthwork, ditch to east, bank up to 4 feet high. {Source Work 2873.}

An Iron Age promontory fort, described by Witts as Randwick Camp. The earthworks consist of a single bank and ditch about 220 yards(201m) long running across the neck of the hill with each end resting on the escarpment {Source Work 862.}

**1883** - In 1883 the bank in places was 5foot (1.52m) above the bottom of the ditch, which lies on the north-east side. {Source Work 862, 252.}

**1947** - A dark line is visible on RAF aerial photographs taken in 1947. {Source Work 864.} The position of this dyke is marked by a dark line of scrub within general area of scrub and woodland (the print is slightly out of focus) (pers. comm. S. Brown).

**1949** - Visible on Ordnance Survey aerial photograph composite {Source Work 6008.} A tree-covered bank and ditch are visible in woodland across a promontory (pers. comm. S. Brown).

**1971** - The site was visited by RCHME in July 1971. A cross-ridge dyke was observed, 600feet (182m) long with no original gap. The bank averages 12foot (3.65m) by 2.5 foot (0.76m) high; the ditch uphill on the east is 24feet (7.31m) by 2.5feet (0.76m) deep. {Source Works 862, 1003.}

**1971** - The site was visited by the Ordnance Survey in November 1971. They observed a crossridge dyke, 200m long, cutting off the promontory to the west. The northern end terminates on steep natural slopes, the southern on moderately steep slopes. The ditch averages 0.6m deep, the bank 0.7m high. The gap in the center may possibly be original as, though the bank on the north side of the bank terminates abruptly and has obviously been cut in recent times, that to the south is well rounded and may have been so constructed. {Source Work 862.}

#### AREA ASSESSMENT :-

No plough damage. {Source Work 470.}

**1994-1995** - A survey of the Haresfield Beacon Estate was commissioned by the NT, and undertaken by Charles Parry of Glos County Council Archaeology Service, during December 1994 - February 1995. The function and date of the dyke remain open to question. In 1995 the dyke was covered by dense vegetation



(mainly brambles). In most areas the earthwork was clear of trees and in good condition, although there was a concentration of trees on the bank to either side of Robbers Road. Discrete erosion caused by visitor traffic was present where the dyke is traversed by footpaths. The erosion from the northernmost path (NT 71329) gives some cause for concern, for there the stony structure of the mound is being rapidly eroded.

It is recommended that erosion caused by visitors is repaired. Consideration should be given to the clearance of trees and saplings from the earthwork, since this would minimize disturbance from roots. Advice should be sought from English Heritage if any remedial works are proposed. {Source Work 2705.}

**1996** - The site was visited by Jan Wills of Gloucestershire County Council Archaeology Service on 29/5/1996. Condition of monument is as described in Haresfield Beacon Survey (Parry 1995). {Source Work 2705.} National Trust have undertaken some clearance of trees and scrub on site several years ago; this was part of an ongoing programme to remove trees and undergrowth. It was agreed that further clearance should be undertaken this year by the National Trust.

### **2015 - Severn Vale NMP Project.**

A cross ridge dyke 200 metres long cutting off the promontory to the west. The northern end terminates on steep natural slopes, the southern on moderately steep slopes. The ditch averages 0.6m deep, the bank 0.7m high. The gap in the centre may possibly be original as, though the bank on the north side of the break terminates abruptly and has obviously been cut in recent times, that to the south is well rounded and may have been so constructed. Published 1:2500 survey revised. The cross ridge dyke is as described above (Sources 1-6), was visible on lidar imagery and was mapped as part of the

Severn Vale NMP project {Source Works 362, 363, 4249 & 13830.}

### **Source References:-**

Source Number	252	Old Number	5
Type	BOOK		
Author	Witts GB		
Year	1883		
Editor			
Title	Archaeological Handbook of the County of Gloucestershire		
Volume Num	0.00		
Publisher	NORMAN BROTHERS		
Where Publish	CHELTENHAM		
Organisation	NOT APPLICABLE		
Article			
Where Available	HISTORIC ENVIRONMENT RECORD		

Reference Description p42 No85

Source Number 15387

Type ARCHIVE

Author Various

Year Various

Editor

Title Historic England Archive Files

Volume Num

Publisher NOT APPLICABLE

Where Publish NOT APPLICABLE

Organisation HISTORIC ENGLAND

Article Historic England Archive Files

Where Available HISTORIC ENGLAND ARCHIVE

Reference Description MD003257 Severn Vale NMP project Aerial Survey Record. Material still held by Aerial Survey. BB78/07886F RANDWICK(1) CROSS-RIDGE DYKE PROFILE BB78/07959 RANDWICK(1) CROSS-RIDGE DYKE PLAN RCH01/092 RCHME Inventory: Gloucestershire I

Source Number 305

Old Number

10

Type BOOK

Author Saville A

Year 1980

Editor

Title Archaeological Sites in the Avon and Gloucestershire Cotswolds

Volume Num 0.00

Publisher CRAAGS

Where Publish GLOUCESTER

Organisation CRAAGS

Article An extensive survey of a rural archaeological resource with special reference to plough damage

Where Available HISTORIC ENVIRONMENT RECORD

Reference Description	p15 7.7 No383 p14 Map5		
Source Number	470	Old Number	9
Type	INDEX		
Author	Saville A		
Year	1976		
Editor			
Title			
Volume Num	0.00		
Publisher	NOT KNOWN		
Where Publish	NOT KNOWN		
Organisation	CHELTENHAM ART GALLERY AND MUSEUM		
Article	Plough Damage Field Survey Notes		
Where Available	CHELTENHAM ART GALLERY AND MUS		
Reference Description	No383		
Source Number	403	Old Number	12
Type	BOOK		
Author	RCHME		
Year	1976		
Editor			
Title	Iron Age and Romano-British Monuments in the Gloucestershire Cotswolds		
Volume Num	0.00		
Publisher	ROYAL COMMISSION ON HISTORICAL MONUMENTS (ENGLAND)		
Where Publish	LONDON		
Organisation	RCHME		
Article			
Where Available	HISTORIC ENVIRONMENT RECORD		
Reference Description	pxxi & xxvii & xxix pxx & 109 Standish		
Source Number	488	Old Number	15

Type	REPORT		
Author	Armstrong L		
Year	1987		
Editor			
Title			
Volume Num	0.00		
Publisher	NOT APPLICABLE		
Where Publish	NOT APPLICABLE		
Organisation	ENGLISH HERITAGE		
Article	Field Monument Warden Report		
Where Available	HISTORIC ENVIRONMENT RECORD		
Reference Description	PRN 32183-PRN32229		
Source Number	484		
Type	INDEX		
Author	Historic Environment Record		
Year	various		
Editor			
Title			
Volume Num	0.00		
Publisher	NOT APPLICABLE		
Where Publish	NOT APPLICABLE		
Organisation	GLOUCESTERSHIRE COUNTY COUNCIL ARCHAEOLOGY SERVICE		
Article	Site file		
Where Available	HISTORIC ENVIRONMENT RECORD		
Reference Description			
Source Number	506	Old Number	14
Type	MAP		
Author	National Trust		



---

Year	1987		
Editor			
Title	1:50000 map of National Trust landholdings		
Volume Num	0.00		
Publisher	NOT APPLICABLE		
Where Publish	NOT APPLICABLE		
Organisation	NATIONAL TRUST		
Article			
Where Available	HISTORIC ENVIRONMENT RECORD		
Reference Description	Ms		
Source Number	864	Old Number	3
Type	AERIAL PHOTOGRAPH		
Author	RAF		
Year	1947		
Editor			
Title			
Volume Num	0.00		
Publisher	NOT APPLICABLE		
Where Publish	NOT APPLICABLE		
Organisation	ROYAL AIR FORCE		
Article			
Where Available	HISTORIC ENVIRONMENT RECORD		
Reference Description	CPEUK1961 3048-9		
Source Number	862	Old Number	8
Type	INDEX		
Author	Ordnance Survey		
Year	unknown		
Editor			

---

Title

Volume Num 0.00

Publisher NOT APPLICABLE

Where Publish NOT APPLICABLE

Organisation ORDNANCE SURVEY

Article (OS Record Cards in paper and microfiche versions)

Where Available HISTORIC ENVIRONMENT RECORD

Reference Description SO80NW11 & 12 with OS card

Source Number 1003 Old Number 7

Type INDEX

Author RCHME

Year 1971

Editor

Title

Volume Num 0.00

Publisher NOT APPLICABLE

Where Publish NOT APPLICABLE

Organisation RCHME

Article Miscellaneous Notes and Plans

Where Available NATIONAL MONUMENTS RECORD

Reference Description

Source Number 2705

Type REPORT

Author Parry C

Year 1995

Editor

Title

Volume Num 0.00

---

Publisher	NOT APPLICABLE
Where Publish	NOT APPLICABLE
Organisation	NATIONAL TRUST
Article	The National Trust Archaeological Survey, Haresfield Beacon Estate. Archaeological Survey
Where Available	HISTORIC ENVIRONMENT RECORD
Reference Description	p.32-3
Source Number	2850
Type	INDEX
Author	RCHME
Year	1995
Editor	
Title	
Volume Num	0.00
Publisher	NOT APPLICABLE
Where Publish	NOT APPLICABLE
Organisation	RCHME
Article	NMR Short Listing
Where Available	HISTORIC ENVIRONMENT RECORD
Reference Description	SO80NW12/114966
Source Number	15259
Type	INDEX
Author	Various
Year	2016
Editor	
Title	
Volume Num	
Publisher	NOT APPLICABLE
Where Publish	NOT APPLICABLE

---

Organisation	HISTORIC ENGLAND
Article	Severn Vale NMP Project NMR Complete Monument Reports
Where Available	SCANNED - HISTORIC ENVIRONMENT
Reference Description	
Source Number	4249
Type	INDEX
Author	Historic England
Year	Various
Editor	
Title	
Volume Num	0.00
Publisher	NOT APPLICABLE
Where Publish	NOT APPLICABLE
Organisation	HISTORIC ENGLAND
Article	Historic England AMIE record
Where Available	SCANNED - MULTIFILES
Reference Description	Unique Identifier: 114966 NMR Number: SO 80 NW 12
Source Number	13830
Type	WEB PAGE
Author	Unknown
Year	2016
Editor	
Title	Cranham Local History Society Lidar Survey Project 2009
Volume Num	
Publisher	NOT APPLICABLE
Where Publish	NOT APPLICABLE
Organisation	CRANHAM LOCAL HISTORY SOCIETY
Article	<a href="http://www.cranhamlhs.org.uk/clhs_1_008.htm">http://www.cranhamlhs.org.uk/clhs_1_008.htm</a>



---

Where Available      WORLD WIDE WEB

Reference Description Cranham Local History Society Lidar Survey Project 2009

Source Number      362

Type                    MAP

Author                Ordnance Survey

Year                    1946-1975

Editor

Title                    OS 1st series National Survey: 6 inch map

Volume Num        0.00

Publisher            ORDNANCE SURVEY

Where Publish      LONDON

Organisation        ORDNANCE SURVEY

Article

Where Available      UNKNOWN

Reference Description OS 6" 1954 OS 6" 1938

Source Number      13732

Type                    MAP

Author                Ordnance Survey

Year                    1936-1938

Editor

Title                    OS 4th County Series: 6 inch map

Volume Num        0.00

Publisher            ORDNANCE SURVEY

Where Publish      LONDON

Organisation        ORDNANCE SURVEY

Article                OS 4th County Series: 6 inch map

Where Available      GLOUCESTERSHIRE COUNTY COUNCIL

Reference  
Description          OS 6" 1938

---

Source Number	3124
Type	ARCHIVE
Author	RCHME
Year	1972
Editor	
Title	
Volume Num	0.00
Publisher	NOT APPLICABLE
Where Publish	NOT APPLICABLE
Organisation	RCHME
Article	Original archives & research documents relating to "Iron Age and Romano-British monuments in the Gloucestershire Cotswolds"
Where Available	NATIONAL MONUMENTS RECORD
Reference Description	RCHM MS Notes 18.7.71
Source Number	15297
Type	CORRESPONDENCE
Author	Various
Year	Various
Editor	
Title	
Volume Num	
Publisher	NOT APPLICABLE
Where Publish	NORWICH
Organisation	HISTORIC ENGLAND
Article	Oral information, un-archived correspondence, staff comments and field investigators notes referenced in NRHE records.
Where Available	HISTORIC ENGLAND ARCHIVE
Reference Description	Field Investigators Comments - F1 ANK 05-NOV-71

Source Number	363
Type	MAP
Author	Ordnance Survey
Year	1920-1945
Editor	
Title	OGS Crawford's set of rectified 6 inch maps
Volume Num	0.00
Publisher	ORDNANCE SURVEY
Where Publish	LONDON
Organisation	ORDNANCE SURVEY
Article	
Where Available	OS CARD
Reference Description	OGS Crawford 7.12.1920