

Consultation Statement

Standish Neighbourhood Development Plan (NDP)

(September 2021)

Purpose

1. This Consultation Statement has been prepared in support of the Standish Parish Council NDP as part of its submission to Stroud District Council.
2. It has been prepared by the Standish Neighbourhood Plan Steering Group, acting on behalf of the Standish Parish Council (“the qualifying body”).
3. Paragraph 4 (3) (b) of Schedule 10 (process for making of neighbourhood development orders) states that: (b) a statement containing the following information in relation to that consultation and participation must accompany the proposal submitted to the authority—
 - (i) details of those consulted,
 - (ii) a summary of the main issues raised, and
 - (iii) any other information of a prescribed description.

Details of those consulted

Introduction

4. Neighbourhood planning was introduced under the Localism Act 2011 to give communities the right to shape and develop their areas. The Standish neighbourhood plan has been prepared by residents and led by Standish Parish Council, shaped by various surveys and public consultations to accurately reflect the needs and wants of the community. Discussions were also held with the Local Planning Authority and with neighbouring developers.

The Steering Group

5. This neighbourhood plan has been produced by a Steering Group made up of Parish Councillors and community volunteers. The Steering Group was supported by Andrea Pellegram MRTPI.
6. As well as time spent on research through interviews and examination of strategic and factual evidence, the Standish Neighbourhood Plan Steering Group has carried out many hours of consultation with residents and has considered comments and concerns about the hamlets in Standish parish and its surroundings. This work has resulted in a Neighbourhood Plan which sets out a vision for Standish and will ensure that the parish continues to develop as a vibrant community whilst retaining its rural character for future generations.

Neighbourhood Plan Preparation Process

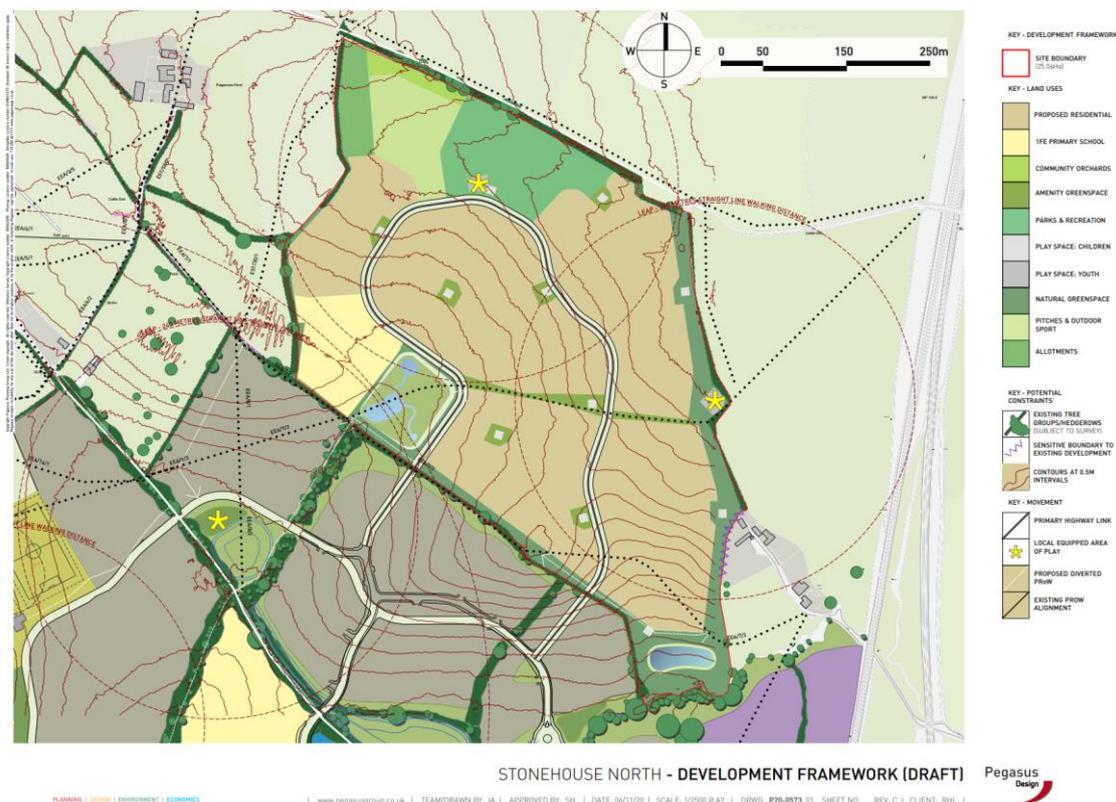
8. The following tables detail the various stages this neighbourhood plan went through to get to this consultation version.

Event	Date
Application to be designated as a Neighbourhood Area	3 December 2013
Decision Notice: Designation of Neighbourhood Area	4 February 2014
Community Visioning Event	15 November 2018
Community Consultation on Draft Policies	23 March 2019
Neighbourhood Development Plan Steering Group meetings	29 October 2020 3 July 2019 29 June 2019 (site visit, Stagholt Farm) 18 March 2019 21 February 2019 17 January 2019
Regulation 14 consultation	10 June - 22 July 2020
Habitats Regulation Assessment	February 2021
Meeting with Robert Hitchins represented by Pegasus Planning	2 March 2021
Strategic Environmental Assessment	March 2021

9. The Neighbourhood Plan was initially based upon the outcomes of the November 2018 Vision event, and the draft policies were validated in the second event on 23 March 2019. The outcomes of the Vision event are provided in Appendix 1 which shows the origin of the vision and the general policy direction.
10. The draft text, policies and text were discussed with planning officers in meeting on 3 June 2019 and 7 November 2019 and clarification on various matters has been provided in email correspondence.
11. Other consultations with statutory consultees was undertaken and the results are discussed in the Evidence Papers that support the NDP.
12. Responses from the community to the survey accompanying Regulation 14 are shown in **Appendix 2**. This shows the comments and red text indicates the NDP response.
13. Responses from the Statutory Consultees, the Local Planning Authority and a landowner with an interest in the emerging strategic allocation are shown in **Appendix 3**. This shows the comments and red text indicates the NDP response.

Consultation with Robert Hitchins and Pegasus Planning

14. In anticipation of the allocation at PS19a, Robert Hitchins and Pegasus Planning have begun preparation of an outline planning application. Pegasus undertook a pre-application consultation regarding the proposals in February and March 2021. The Parish Council's response, based upon the emerging NDP policies, is attached in **Appendix 4**. Subsequent letters to Gloucestershire County Council and Stroud District Council were also sent, also included in that Appendix. An online meeting was held between Pegasus Planning, Robert Hitchins and the NDP Steering Group on 2 March 2021: the minutes of the meeting are also in the Appendix.



Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA)

15. The SNDP Steering Group asked the LPA at which stage to seek a screening opinion on the need for SEA and HRA. The response in the meeting on 7/11/19 was that this should occur at Regulation 14 stage. Accordingly, a request for a screening opinion was made by the NDP consultant to the LPA in an email on 19 May 2019. A full screening opinion was never provided and therefore the NDP steering group commissioned AECOM to undertake SEA Screening, SEA and HRA. These documents are included in the NDP evidence. The full email exchange is included in **Appendix 5**.

16. Changes were made to the NDP to account for the following recommendations:
- a. SEA recommendations:
 - i. Modification of description of character area B under Policy S1.
 - ii. Change of reference in Policy S4 from B Class uses to E Class uses to reflect recent changes in the use class order.
 - iii. Change the period of the plan to 2040 to reflect the changed plan period for the emerging Stroud District Local Plan.
 - b. HRA recommendations:
 - i. Additional wording in Policy S2 to ensure that the development will be recreationally self-sufficient.
 - ii. Reference to the need to make a financial contribution to the Severn Estuary Mitigation Strategy.

Steering Group changes to Regulation 14 draft NDP

17. In October 2020, the County Council advised the Steering Group that more detail was required regarding the multi-user track. The new Figure 11 and Figure 12 were prepared in response and added to the NDP. A copy of the email is attached in **Appendix 6**:
18. A new community member joined the steering group after Regulation 14 consultation had been completed who is a very experienced landscape architect who is working on the Standish Hospital development. He made suggestions for the NDP which the Steering Group supported. This has resulted in changes to Policy S2 with the addition of new requirements added for (J) Landscape and Habitats Management Plan, and (K) soil management.

Second Regulation 14 Consultation

19. A second Regulation 14 Consultation was undertaken between the dates of 19 July 2021 and 30 August 2021. The same set of consultees were consulted as a year previously.
20. Responses were received from the following parties and their comments and the NDP response are detailed below. Detailed comments and SNDP response are set out in **Appendix 8**.

Marine Management Organisation
Gloucester Wildlife Trust
Stonehouse Town Council
National Grid
Coal Authority
Highways England
Pegasus Group (Louise Follett)
Historic Places (David Stuart)
G.C.C. Senior Planning Officer Rob Niblett
Stroud Town Council Senior NP Officer Simon Maher
Sport England

XXX (Residents)
XXX (Residents)
XXX (Resident)

Generally

Overall, this plan is a welcome focus on our Parish and how we wish to see it evolve in the future, particularly when, like many rural areas, it is under 'threat' from large scale development and economic growth of the nearby conurbations.

It would be easy to overreact to the 'newtown' threat and oppose any development, but we feel the NDP has responded to this very thoughtfully and thoroughly, so thank you.

However, we have to be realistic about development and small-scale infill housing. Standish struggles somewhat. We comprise a small number of dwellings, very spread out, some in isolated clusters and remain remote from one another. On the positive side this gives the opportunity to live in very low density, uncluttered spacious countryside surroundings (a large reason why most of us enjoy living here). On the negative side, we struggle to maintain and develop a sense of community, hovering at that boundary of critical mass for a thriving community.

The History & Context section of the NDP, bears this out, telling a tale of gradual decline of the community:-

"With only 120 households, Standish is a very small community."

"Between 2001 & 2017, population of Standish dropped by 10% (Gloucester increased by 10% over this same time)."

"There has been very little development in Standish. However, Stonehouse has grown significantly from a rural parish to the 2nd largest settlement in Stroud District."

"At least 16 cottages have been lost, mainly located near the old village on Standish Lane."

"Sadly, daily contact and inter-communication is infrequent as the parish is large and housing is scattered throughout."

Yes, this is sad. We believe a small number of dwellings within existing clusters, will help increase numbers, provide much needed influx and stimulate the thriving community many of us seek, without the slightest threat to the overall landscape and rural character of the parish.

There have been good examples of this over the last 10 years or so:- Tilia Barn; Elderberry Cottage; Little Haresfield; cottages adjacent to New Moreton Farm: extension to The Mews. These have all increased occupation and have had a positive effect on the parish.

We also need to be seen to have taken account of latest and up-to-date evidence of housing need (which we seem frequently reminded of).

Whilst we are not suggesting our NDP goes further in identifying specific infill areas for development, (although we are in fact entitled to do this), we suggest including an aspiration and policy to increase housing numbers through some organic growth.

It is an easy instinct to 'oppose' development. Rather, we should look favourably on small-scale infill development, which would contribute to meeting the housing need, seeing it as an opportunity to improve the parish community for us all, for current and future generations.

XXXX

16 August 2021

XXXX (Residents)

XXXX (Resident)

Appendix 1: Vision Event, 15 November 2018

Andrea Pellegram welcomed the group and gave a short talk about what a Neighbourhood Development Plan could do, and could not, to influence future development. The event was attended by 15 villagers.

STRENGTHS

- AONB
- Rural Character
- Wildlife – owls, deer, foxes, badgers, bats, hares
- Flora – bluebells and garlic
- Access to the motorway, Stonehouse, Gloucester
- Tranquillity
- Views of escarpment and Wales
- Sense of community
- Must seek out community because of dispersed nature of settlement
- Village Hall and Church
- Working Farms
- Good footpath network and walks, access to Cotswolds Way
- Parish Council is good

WEAKNESSES

- Traffic on rural roads
- Proximity to motorway
- B4008 is not sufficient for the amount of traffic upon it
- Noise from traffic
- Bus services to Gloucester are poor and under threat of diversion to Westington (former name for “Great Oldbury”.)
- Community is spread out
- Lack of a pub
- Communication in the village is difficult (not everyone agreed)
- Broadband (none at present and roll-out is on hold)
- Unsafe to walk and cycle along the B4008
- Rat running

OPPORTUNITIES

- New development might introduce a community centre that current Standish residents can use
- PROW improvements
- More community services
- Affordable housing for local people
- CIL receipts
- Security for the village Hall (currently owned by the church and leased to the village).

THREATS

- Encroaching development nibbling away at rural area
- County Council is major land owner
- ½ of the parish is “good” development plan (not AONB or subject to flooding)
- Access of new development on B4008 will open up more development land
- Traffic increases due to new development
- Fly tipping
- GP surgeries overloaded
- Secondary school is crowded
- Village Hall is leased from the Church
- A boundary review might put the new developments in Stonehouse

VISION: IN 2035, STANDISH WILL BE A PLACE WHERE:

- Public rights of way are safe and accessible
- New housing is carbon neutral with higher standards than other development
- The rural identity of the parish and its tranquil rural character will be retained
- Standish will have retained its separate identity from Stonehouse
- There will be access to a good range of community infrastructure
- Most homes will be on standard sewers, on mains water and will have access to Broadband
- There will be a new village centre that will serve the whole community
- The Parish does not feel severed by the railway line
- Light pollution is controlled
- Black Bridge does not become a road that would lead to rat running to the B4008 and noise and light pollution in rural areas

POTENTIAL POLICY THEMES

Strategic Development Principles

- Existing local plan policy and allocation SA2
- Proposed additional Strategic Sites PS19a and PS19b
- Green Lung with improved recreational access for Strategic Sites

Strategic Sites

A Masterplan will be required for Strategic Development Sites in the Parish that make provision for, as a minimum, the following:

- Community centre that is accessible to all parts of the Standish community
- New Village Hall
- On standard sewers, mains water, broadband
- Built to high energy efficiency standards (carbon neutral)
- Control of light pollution into dark countryside at edges of strategic developments
- Main access not via Black Bridge (unless Stagholt Farm is allocated)
- Priority given to people with a local connection

Sustainable Transport

- Links from strategic development sites to rural hinterland
- Improved PROW network in Standish
- Improved Railway Crossing between Strategic Development and Standish

- Cycle lane along B4008
- Improved access by PROW to AONB from Strategic Sites

Green Lung

- Standish to provide opportunity for passive recreation and tranquillity for residents of strategic sites

Housing Land allocation – Stagholt Farm

(This will only be progressed at the wishes of the landowner)

Appendix 2: Responses to Regulation 14 Consultation from members of the community

Responses to **DRAFT STANDISH NEIGHBOURHOOD DEVELOPMENT PLAN: QUESTIONNAIRE July 2020**

	Q1 Do you agree with the Vision for Standish? If not, what alternative wording can you suggest?	Q2 Policy S1 seeks to provide a decision-making framework to ensure that development is directed to suitable locations and that new development protects Standish's most important characteristics. Do you agree with the wording of this policy? If you do not agree, what alternative wording would you propose?	Q3 Policy S2 sets out a framework for how the proposed new housing site referred to in the draft emerging Local Plan (November 2019) should be developed. The site is renamed "South Standish" rather than "Northwest Stonehouse or PS19a). Do you agree with the wording of this policy? If you do not agree, what alternative wording would you propose?	Q4 Policy S3 identifies important routes for walking and cycling, and also where additional motorised transport should be avoided. Do you agree with the wording of this policy? If you do not agree, what alternative wording would you propose?	Q5 Policy S4 allocates land at Stagholt Farm and proposes new uses for the site. Do you agree with the wording of this policy? If you do not agree, what alternative wording would you propose?	Q6 Are there any land use planning matters not addressed in the plan, which you think should be addressed? Can you please describe what you believe is missing or in need of correction?
1	We agree	We agree	We agree	We agree	We agree	Nothing missing in our opinion
2	Yes	Yes	Yes	Yes	Yes	No
3	The final bullet point is in the wrong tense and very specific for a 'vision' statement Alternative: there are no rat runs to the B4008 or rat runs to the B4008 have been avoided.	The inclusion of the word normally in 1 made me feel that was a less powerful statement than 3 "only allowed". Do we have to include normally? The LPA did not question	☑	☑	☑	---

	This was a point that came out very strongly in the vision event – no change.	this, and the policy cannot preclude development. No change				
4	I agree	I agree	I agree	I agree	I agree	None
5	Agreed	Agreed	Yes agreed	Agreed	No comment	None
6	<ul style="list-style-type: none"> Slightly more positive wording re: B4008 might be; 'sustainable transport should be encouraged and vehicular use of the B4008 discouraged' <p>This was a point that came out very strongly in the vision event – no change.</p>	<ul style="list-style-type: none"> Agree 	<ul style="list-style-type: none"> Agree 	<ul style="list-style-type: none"> Agree in principle however, for the 'Standish Loop' parking in the lanes/roadside could become an issue for those unable to access the loop on foot. <p>Not something that the NDP can influence – no changes made.</p>	<ul style="list-style-type: none"> Agree 	<ul style="list-style-type: none"> No reference to the current development of the Standish Hospital site or the impact this will have in addition to the proposed development to the south of Standish. This application has been determined so the NDP cannot influence it. S.14 of Landscape and biodiversity impact of strategic development suggests areas around all watercourses shall be designated as open space, it does not specify if this is within the development or throughout Standish. The latter option seems a rather tall order with a lot of implications. The rules around S106 will ensure that when this is agreed with the LPA, the provision will be reasonable. No changes We congratulate and thank those

						involved with putting this plan together for all their hard work.
7	Yes - agree	<p>Although I support most of S1, I disagree with point 2 regarding Area C. This area should be designated as unsuitable for development because it would cause harm to the tranquillity of the countryside and to the setting of the AONB and of the listed centre of the village (Church, Village Hall and Standish Court). Great Oldbury and South Standish are significant developments that will have a major impact on Standish and the surrounding area. Any further creeping development into Area C would be so far away from Stonehouse that it would inevitably generate maximum additional traffic, adding to already overloaded roads. Local services (e.g secondary schools) are already overstretched. Access to the B4008 or Standish Lane would/should be out of the question, adding yet further pressure on the A419 at the Eastington roundabout. Further 'piecemeal' development in the area allows developers to avoid providing the required infrastructure that would mitigate sustainability issues -</p>	<p>There is a typo in para 70 and a repetition of the 'rural character' bullet point in the list of South Standish Development Principles.</p> <p>I agree with S2. Just one point - in point d) Transport Statement "must identify means by which traffic will be discouraged or prevented from using the B4008" I would like to see the word 'discouraged' deleted.</p>	<p>Very supportive of S3. I think it is a very positive programme of action - not merely reactive to outside pressures but ensuring we do our bit to improve our environment and people's health and maintain access to the countryside.</p>	I agree with S4	I think this is an excellent document. Well done all!

		<p>it should be avoided at all cost. The Neighbourhood Plan should not allow a window of opportunity for developers and the LPA to consider further development in this area.</p> <p>Current development plan policy indicates that Area C is countryside and so most development would not be allowed, though it may be for agriculture or ancillary to existing uses. No change made.</p>				
8	Yes	Yes	Yes	Yes	Yes	<p>Yes</p> <p>The actual location proposal for 'Community Centre' in the Vision for Standish in 2036 Box 2. Use of the existing village seems most logical – based on cost and existing awareness.</p> <p>It should probably be in the new development but this has been clarified</p> <p>Consideration for planting/landscaping to disguise and blend the industrial eyesores of \javelin Park to the North West of Standish Church and Area E. Consideration for same in the revised titled 'South Standish' PS19a Development.</p> <p>The policy for South Standish does</p>

						<p>require screening. The NDP cannot influence past decisions regarding Javelin Park.</p> <p>There is no mention of any section 106 conditions which could provide financial support for green infrastructure.</p> <p>It is expected that most of the policies in the NDP will be delivered through S106.</p>
9	Yes	Yes	Yes	Yes	Yes	<p>Designated crossing points on the B4008 so that residents can access the proposed multi use routes, for instance between Black Bridge and Horsemarling Lanes. Otherwise these routes will only serve residents on one side of the B4008, which is a difficult & dangerous road to cross especially at peak times.</p> <p>Good point – changes made to S3</p>
10	<p>Broadly speaking, yes. However, we are not convinced that transitioning to mains water (away from the Standish supply) should be part of the Vision.</p> <p>We are also not sure what is meant by 'a new village centre that serves the whole community'.</p>	<p>We do not agree that there should be a distinction between area E, which is 'not a sustainable location for development except under limited circumstances' and area C, for which the wording appears less unambiguous. The two areas have very little</p>	We agree	<p>We agree, provided that the proposed route linking Crowcomepill, Black Bridge and Standish Church remains a footpath/bridleway/cyclepath only (as we assume it will be).</p>	We agree	<p>It is clear from the plan that the Parish Council are in general opposed to large-scale development in the parish, except with regard to South Standish/PS19a. We very much agree with this approach, and the rural character of the parish was one of the primary reasons we moved here in 2019. In recent years, this part of Gloucestershire has seen and continues to see encroaching development – notably including</p>

		difference in character, consisting of open farmland, and the protection given to area E should also be extended to area C.				Javelin Park to the north, and the Great Oldbury development to the south. Standish has become something of a 'green belt' breaking the chain of development from Gloucester through Stonehouse to Stroud, and faced with such developments it is important that its rural character be retained.
11	_____	_____	_____	_____	_____	I have read the Plan twice – slowly and carefully. I do not understand it and know “what will be, will be” despite the Parish Council being permitted miniscule modifications. Sorry!
12	Yes	Yes	Yes	Yes	Yes	N/A
13	Yes I agree	Yes I agree	Yes I agree	Yes I agree	Yes I agree	No
14	Yes	Yes	Agree use of 'South Standish' site name. Would like the requirement for housing/businesses building design to generate own power and/or be low carbon to be stronger. There is a requirement to maximise onsite renewable – no change	Agree Older population should also be able to use a quality/frequent park and ride service. Not something that the NDP can influence – no changes	Agree	
15	Yes	Yes	Yes	Yes	Yes However, with reference to Paragraph	_____

					<p>98, Page 40, the wording is slightly ambiguous. For the sake of clarity, the landowner of Stagholt Farm does not have exclusive access over Blackbridge Lane & the Railway Bridge. Others whose land is accessed from the lane & the bridge (eg landowners, tenants and the Local Authority) also have rights of access. Access to the Stagholt site should be via the Oldends Lane entrance as proposed and not via Blackbridge Lane.</p> <p>Changes made</p>	
16	<p>This is a pointless exercise as the powers that be will do what they want for example Standish hospital. I have lost count of the meetings held about that even the week of opinions culminating in a village meeting and the authorities got what they wanted NOT what the residents of Standish wanted. And let's not forget the incinerator. What you are doing is very noble but you are wasting your time.</p>					
17	Yes.	Yes	Yes (Ref Q1)	Yes – very much	Yes	None

	<p>Except the new village centre. It should be in Area A – Horsemarling Lane, New housing (Already built). It would be a more true centre for the populated areas of G- without cutting off the more rural areas of E,F and D.</p> <p>This would require a change to an existing development and is unlikely to be realised. A new centre could only realistically be achieved in the new housing scheme. In addition, Area A is in the AONB and it would not be appropriate to increase development there. No change.</p>					
18	Yes	<p>Point 3 development in areas D and F will only be allowed where it preserves, protects and <i>enhances</i> the listed buildings and their landscape setting. The word <i>enhances</i> is too vague and open to different interpretations. Is the word needed?</p> <p>This is the correct wording and no change made (NPPF 185 uses enhance)</p>	Yes	<p>The multi user route exiting onto Standish Lane could present a hazard as the lane is narrow and dangerous. Cars and heavy farm vehicles use the road as a rat run and there are frequent near misses. Any exit from the track would have to have traffic calming measures. Does multi user include motorbikes or other motor vehicles? I would object on noise grounds and safety grounds if it did.</p> <p>It is expected that this would be limited to walkers, cyclists,</p>	Yes	<p>Junction 12 is not big enough to take the additional traffic that would be generated by South Standish. It would need to be extended – it is already dangerous and difficult to enter/exit at peak times 20-25minute wait already to join from the B4008 in the morning and waits on the hard shoulder up to ¼ mile before exiting J12 heading South in the evening. I have a lot of first hand experience of this – it may be somewhat reduced due to Covid restrictions now but I am sure it will increase again soon.</p> <p>This relates to the strategic allocation and is not something that the NDP can influence.</p>

				equestrians.		Standish lane would be used as a rat run with the new settlement increasing danger, noise and litter. Some form of speeding restriction (enforceable) would need to be put in place, the lane improved and traffic calming put in place. The NDP cannot influence highways management
19	<p>Yes & would add-</p> <p>1. Any new buildings should have a mix of housing bands/types <i>This will be addressed in the Local Plan policies</i></p> <p>2. Noise, traffic noise in particular, needs to be controlled with any new build by planting trees as natural barriers along roadsides, erecting noise reduction panels at the edge of housing etc as appropriate. This applies long term and not just for the duration of any building work. This relates to your point on tranquil rural character but I would like to see it emphasised more. <i>Added "noise" to the last bullet</i></p>	<p>Point 3 development in areas D and F will only be allowed where it preserves, protects and enhances the listed buildings and their landscape setting. The word <i>enhances</i> is too vague and open to different interpretations. Is the word needed?</p> <p><i>This is the correct wording and no change made (NPPF 185 uses enhance)</i></p>	Yes	<p>The multi user route exiting onto Standish Lane could present a hazard as the lane is narrow and dangerous. Cars and heavy farm vehicles use the road as a rat run and there are frequent near misses. Any exit from the track would have to have traffic calming measures. Does multi user include motorbikes or other motor vehicles? I would object on noise grounds and safety grounds if it did. It would not be in keeping with the vision fo tranquil rural character.</p>	Yes	<p>Junction 12 is not big enough to take the additional traffic that would be generated by South Standish. It would need to be extended – it is already dangerous and difficult to enter/exit at peak times 20-25minute wait already to join from the B4008 in the morning and waits on the hard shoulder up to ¼ mile before exiting J12 heading South in the evening. I have a lot of first hand experience of this – it may be somewhat reduced due to Covid restrictions now but I am sure it will increase again soon.</p> <p>Standish lane would be used as a rat run with the new settlement increasing danger, noise and litter. Some form of speeding restriction (enforceable) would need to be put in place, the lane improved and traffic calming put in place.</p> <p><i>This relates to the strategic allocation and is not something that the NDP can influence.</i></p>

						<p>We have another important comment about an inaccuracy about flooding at Standish Court that needs to be corrected in the plan.</p> <p>P.14 Para 30. states 'In 2007 parts of Standish suffered under localised flooding. The Parish Council and others have worked since that time to seek to reduce flooding during severe weather events in Standish. <i>Standish Court suffered badly, particularly in the 2007 floods, but at other times too.</i></p> <p>We have a strong objection to the italicised comments which are inaccurate.</p> <p>Two houses in standish Court suffered in 2007 due to localised flash floods. Measures have since been taken to remedy the cause of this and have been successful. Standish Court comprises of 8 properties and all the rest were completely unaffected. We have lived here for 26 years and to our knowledge and the information provided by residents living here in the 1950s and beyond no other flooding has ever taken place as your document states.</p> <p>Please correct this inaccuracy. In its current form the document potentially blights our property.</p> <p>Correction made</p>
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20	<p>Yes. We would like to refer to Page 22 paragraph 51. This aspiration should be paramount in any future development planning otherwise the vision for Standish is a fantastic document.</p>	<p>Page 27 Item 3 We would prefer the wording to read 'Development in Areas D and F should not be allowed'.</p> <p>Planning policies should be positively prepared (NPPF 35) and it would be inappropriate to preclude all development.</p>	<p>Although we suspect that the decision has already been made, we object strongly to Area G or PS19a being called South Standish. Once Area G is developed, it will be cut off from Area F by Areas C&D. The temptation for development to go ahead in these areas in order to join up Area G to Area F will become irresistible and will eventually seriously damage the tranquil rural setting of Standish Court. Calling Area G South Standish will be the thin edge of the wedge. We suggest PS19a be called Stonehouse North West.</p> <p>"South Standish" will be used for the purposes of the NDP, but it is expected that the final developer will rename the scheme.</p>	Yes	Yes	The Draft Standish Neighbourhood Plan 2020-2036 is a magnificent piece of work and all those involved in its construction should be congratulated.
21	<p>The SNDP is very good – thorough, clear, well argued, backed up with relevant facts.</p> <p>But P7 Box 2 'There is a new village centre ...'. This needs expanding – comprising when/where/funded how?</p> <p>Added "to any new large housing</p>	<p>P27 No. 3 Suggest this is much stronger, otherwise it will have no effect e.g. 'Development in Areas D&F shall never be allowed, to protect the historical integrity of Standish parish & its Grade 1, 2* & 2 listed buildings (Church, Gateway, Court)'.</p> <p>Policy must be positively</p>	<p>No.</p> <ol style="list-style-type: none"> 1. Please see Q2 for my comments on the entirely inappropriate name, needs changing. 2. Please see Q2 for my comments on protecting integrity of historical Standish. <p>"South Standish" will be used for the purposes</p>	<p>All good. And the cycle/pedestrian pathway Stonehouse to Little Haresfield is welcome, even on to the M5 connecting safely into Gloucester.</p> <p>Right now it badly needs cutting back because pedestrians have to walk on the road for sections –</p>	<p>Yes.</p> <p>Both S3 & S4 have impressive attention given to saving our rich ancient hedges 9biodiversity hotspots) and ancient trees. This is so good.</p>	<ol style="list-style-type: none"> 1. Page 14 para 30 I've owned Abbots Wing in Standish Court since 1992. The Court has never been flooded. Please correct to: Two houses as the far end of the Court have flooded, since then preventative action upstream has been effective and they have not flooded. 2. The Standish Hospital <p>Correction made</p>

	<p>scheme”</p> <p>‘Standish has retained its separate identity from Stonehouse’ This is vital. Suggest it is moved to top of the vision list. Much of what follows pertains to this, so it is the fundamental framework for Standish Vision 2036 e.g. P22 para 51.</p> <p>Moved to the top</p>	<p>worred and allow the possibility that there will be some form of developmet. – no change.</p> <p>P27 No. 5 Area G development is an extension of Stonehouse. Even though it sits in Standish Parish it does not relate to, nor was inspired by St Nicholas the Parish Church, this Area G should, I suggest, be called a name that does not include the word Standish. Perhaps ‘Pidgemore’ after the nearby farm?</p> <p>“South Standish” will be used for the purposes of the NDP, but it is expected that the final developer will rename the scheme.</p>	<p>of the NDP, but it is expected that the final developer will rename the scheme.</p> <p>3. P31, d: suggest we amend to ‘must have access from the A419 and not B4008. (That road cannot sustain any more traffic and will already have Standish hospital developments – 147 new dwellings and business).</p> <p>The policy states that must discourage or prevent traffic from using the B4008. Where it goes is not of concern to the NDP since other roads will be outside. No changes</p>	<p>terrifying!</p>		<p>development (approved) will double Standish Parish households (now 120, with an extra 147 & light business accommodation). This is a massive change and upheaval for the parish – in footfall, cars, sewerage, children’s leisure needs, sports facilities etc & it seems the magnanimity of this is not fully addressed in the Vision. P7 box 2 and throughout the document.</p> <p>The NDP cannot influence past planning decisions</p> <p>3. The B4008 – It is very dangerous. It needs a 40MPH speed limit and speed cameras, then plans for coping with double the traffic.</p> <p>The NDP cannot influence this</p>
22	<p>We are confused by the reference to “<i>There is a new village centre that serves the community</i>”. It is not clear from the documentation what this means and where? It is suggestive of a significant development and if so, where? We think this is an important comment to set out as part of the vision and thus needs further explanation so we can understand precisely what this means and its impact.</p>	<p>No 5- we strongly disagree with the reference to “South Standish” – it appears to us to open up the possibility of incremental growth – implies that there is a possibility of further development in the Standish Parish. We already have the use of “Standish Gate” all the way down into Stonehouse.</p> <p>Standish implies a rural area, Stonehouse doesn’t.</p>	<p>No – please see comment above.</p>	<p>We strongly disagree with the proposal to make a multi-user track in orange on figure 9. We don’t understand the necessity for it. It is beautiful countryside with lots of wildlife – peaceful and its clear wildlife flourishes here. On this basis we can’t understand why there is a need to destroy more of the land and risk the adverse impact to nature, particularly as we can’t see the need for it. The path is already</p>	<p>It is clear from the Robert Hitchin’s scoping document that further development is being considered. We think the wording in s4 should make it clear that the number of houses is the absolute limit without any scope for further development.</p>	<p>Yes – definitely. Paragraph 30 is incorrect and <u>must</u> be changed. It is incorrect to state that “<i>Standish Court has suffered badly, particularly in the 2007 floods, but at other times too</i>” . To our knowledge having lived in the Court for 19 years, only 2 properties, both of which have the Arle Brook running through them, have suffered flooding. The current wording implies that all properties have been affected.</p> <p>Correction made</p>

	<p>Agreed – change made</p> <p>No comment on the other points.</p>	<p>“South Standish” will be used for the purposes of the NDP, but it is expected that the final developer will rename the scheme.</p>		<p>accessible to walkers and as a bridleway.</p> <p>This route has been agreed with GCC and is also on the boundary of the proposed development. It will require improved access. No changes.</p>		
23	Agree	Agree	Agree	Agree	Agree	<p>I would like to take this opportunity to thank SPC for their work in pushing SDC to fund preventative flood measures.</p> <p>I do hope that other farmers will allow additional works, helping to alleviate flooding through gardens and properties within Standish catchment area.</p>
24	I do agree	I agree	I agree	I agree	I agree	<p>No – but:</p> <p>It is not strictly relevant to this plan, but I remember the parish before Dutch Elm Disease and feel that the landscape was so much richer when tree cover was greater. Any encouragement for hedgerow management that would allow for more trees would be welcome.</p> <p>And traffic isn’t just a problem on the B4008 – the speed of some cars using side lanes as rat runs made me give up my bicycle – I was run off the road</p>

						twice in one week. But those minor points apart – Great job, Parish Council, in protecting the parish so well. Many thanks.
25	<p>We would like to see point 3 at the top of the list – retaining the rural identity of the parish and its tranquil rural character should be paramount.</p> <p>Agreed</p> <p>We would also like the vision to include reference to providing a vital ‘green lung/corridor’ between M5/Gloucester and Stonehouse for recreational use not only for Standish parishioners but also those living in the more urban local areas.</p> <p>Agreed – change made</p> <p>We would like further clarity on the possible positioning of the new village centre.</p> <p>Agreed</p> <p>All new development should be planted with carefully selected native plants that are well maintained and</p>	<p>We do not agree that Areas C or D should be considered for development. They are both ‘countryside where only rural development would be appropriate’ as identified in Area E.</p> <p>The current wording for Areas C and D offers stronger protection than for Area E which is appropriate since more harm could be caused in C and D. No changes.</p> <p>Standish has already more than doubled its housing provision with developments at Standish Hospital and Standish Gate; the additional development proposed at PS19 will have a further huge impact on the local infrastructure. Piecemeal development would allow developers to avoid providing required infrastructure.</p>	<p>We do not agree. The inclusion of Standish in the name may encourage developmental ‘creep’. Geographically the proposed new development (PS19) would be part of Stonehouse.</p> <p>“South Standish” will be used for the purposes of the NDP, but it is expected that the final developer will rename the scheme.</p> <p>If the development goes ahead and remains Standish then the majority of Standish parishioners will live in the new development and this would then become the centre of the village and the ‘driving force’ of the village. It will change the whole makeup and decision making of this</p>	<p>Encouraging less car use is laudable.</p> <p>The multi user route from Crowcomepill to Standish must remain a bridleway/cyclepath with no motorised vehicles. The exit onto Standish Lane will need very careful management/ speed restrictions as it exits at a dangerous bend, where frequent accidents/near misses occur.</p> <p>The policy is in replacement of the private car</p>	<p>This is such a beautiful site with rich biodiversity.</p> <p>The comments of GCC senior planning officer that easement of at least 8ms between the development and watercourse should be provided for riparian maintenance must be observed.</p> <p>This will be addressed at the planning application stage and the current wording is clear about what is intended.</p>	<p>Thank you to all those parishioners who have worked on this document.</p>

	<p>monitored to ensure that they survive, flourish and provide a basis for a rich diversity of wildlife. Developers must act on advice from environmental experts eg EA and Gloucester Wildlife Trust to ensure that the biodiversity in the area is protected both during building and for the site when it is built.</p>	<p>Any development in Area C would add unacceptable pressure on the already over stretched local resources and would inevitably put huge pressure on overcrowded B4008 and local lanes.</p> <p>Will add additional wording about avoidance of pressure on country lanes.</p> <p>The fact that parts of Area D are classified by the Environmental Agency as Zone 3 for flood risk should mitigate against any development in the area.</p>	currently rural village.			
26	<p>That light pollution should be minimised rather than controlled</p> <p>Agreed – change made</p> <p>That there should be no new ANOB development</p> <p>This would not occur under current policy – no change</p>	Yes the wording looks very good	Yes this is better	<p>The wording is fine</p> <p>Some thoughts:</p> <p>I agree that transport is very important development issue as the B4008 is unsafe. So the multiuser track is a good way forward and an important development criteria for any future development along this corridor</p> <p>PROW development in parish should take into</p>	Yes agree	<p>Light pollution is a real issue when looking west from the AONB - Muller particularly and the incinerator to a lesser extent generate huge amounts of light at night - really necessary for operational reasons? It is essential that any future development should not exacerbate this problem to protect bats and preserve the feel of such a important part of the Parish.</p> <p>The only major development (other than future strategic allocations) will only occur in South Standish where there is a requirement to consider light</p>

				<p>account the overuse of Standish woods recently due to the mountain bikes taking over and damaging the woods. It is a issue for that the National Trust that the woods retain their natural character as a tranquil place for walkers and so the plan should put the emphasis on the Standish loop being a footpath rather than a cycle way.</p> <p>This is unfortunately not something that the NDP can influence because it is due to NT management. No changes.</p> <p>The proposed "loop" through the woods as a spur that comes down a particularly steep and narrow stony track which is the sole vehicle access to Pump House and Cherry Fair. This is currently a pinch point for all users so it would be best to not include that section on the route map.</p> <p>The intention was to create a loop and if a section is left out, it is not a loop. No changes.</p>		<p>pollution.</p>
27	Yes - agree	Broadly agree, however I	I would like to see a stronger	Yes – strongly agree, this is a	Yes- agree	There is nothing here that protects

		<p>would like to see stronger protection from development for Area C. This is very similar in nature to Area E and is at risk of ‘development creep’ assuming South Standish goes ahead. Development in Area C would not qualify as ‘sustainable’ as it would be a long way from Stonehouse facilities and therefore likely to increase traffic use on B4008.</p> <p>Changes made</p> <p>NB the word ‘is’ is missing in para 9, first line ‘...it within the gift...’</p> <p>Could not find reference</p> <p>Para 20, last line should read ‘... an urban character...’ (not ‘and’)</p> <p>Could not find reference</p>	<p>requirement for housing/businesses to generate their own power, in addition to the excellent points made here re carbon neutrality.</p> <p>The wording applies to all development – no changes</p> <p>South Standish development principles:</p> <ol style="list-style-type: none"> 1. should seek to ensure that any new planting is in sympathy with existing, with a concentration on native species to enhance opportunities for wildlife, and is planted at the appropriate time of year and well-maintained, particularly to ensure survival in the early stages. <p>Text added</p> <ol style="list-style-type: none"> 2. I would like to see vehicular access from the South Standish site unambiguously excluded. <p>This is set out in the development principles and the policy – no change</p> <p>NB Para 70 of main doc</p>	<p>significant contribution to combating climate change and species extinction.</p>		<p>against encroachment into Standish from the north. This is a concern given the industrial development at Javelin Park and St Modwen’s site. Perhaps the NDP could also consider protecting the views out of Standish towards these eyesores.</p> <p>The intervening land between the settlement of Standish village and the motorway is countryside. The Javelin Park complex was strategic in nature and outside the influence of an NDP.</p>
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			– typo in last line. Correction made			
28						<p>I have spent some time examining the details of the Standish Neighbourhood Development Plan and have to congratulate the authors on a very comprehensive and, I guess, time consuming project.</p> <p>I cannot see that there is anything fundamental that I wish to propose being altered and I think the renaming of 'South Standish' in Policy S2 gives much more clarity to the actual position of the area within the Parish Boundary. It is a common sense name!</p> <p>I particularly like the designated 'historic' area surrounding the Church, Village Hall, and Court archway as it will enable the Church and Village Hall to continue to be used in their present way with some protection from 'doorstep' development.</p> <p>I am very happy for the Plan to be submitted in its existing format.</p>
29	Yes - agree	Agree, but can Area C be afforded the same protective statement as Area E? Area C is the same type of farmland as Area E but is more vulnerable to development bids – bids which would completely change the character of Standish and would be so far from facilities that it would necessitate additional	Yes- agree	Yes – strongly agree, we need to do all we can to reduce motorised traffic and traffic pollution in the village and facilitate sustainable travel. As a horse rider, I would welcome safer routes to enable me, for instance, to access Standish Woods. As parents of young children, we want them to be able to move	Yes- agree	As a general point. Standish is a relatively undeveloped area, between the urban centre of Stonehouse and industrial development in Haresfield Parish/ intensive housing in Hardwicke. As such, it performs a vital environmental function for the people of Standish AND the surrounding built-up areas. It is also very significant for the protection and enhancement of wildlife. We see that development at

		(unwanted) traffic use of the B4008. The current wording provides stronger protection for Area C than Area E – no change		about the village safely on foot and by bicycle.		South Standish may be inevitable but it is not welcome. Anything that can be done via the NDP to protect against further development in the parish is welcome. We thank all those involved in the production of the NDP for their efforts in producing such a comprehensive and well-evidenced document.
30	I agree totally with the vision for Standish. It is hugely important to recognise the history and heritage of Standish and vitally important that every effort is made to not only protect but enhance every aspect in areas A B C D E F and G, relating particularly to planning and development – now and in the future.	Fully agree with the decision making framework.	The framework for Policy S2 (South Standish) is totally comprehensive and covers every aspect that should be addressed in any development that can have an impact on the AONB and the remainder of Standish and should ensure the rural character of the parish is protected at all times.	Fully agree.	Fully agree. The redevelopment of the site as outlined to areas A B and C could provide a very special and diverse development with multiple possibilities providing suitable access can be negotiated.	One matter not addressed in the plan is Horsemarling Lane. Traffic flow on the Lane – accepting traffic is not excessive and the road is unrestricted - at times is travelling at a greater speed than is safe to do so. In view of the development starting at Standish Hospital by P J Livesey to provide 147 new homes to the parish this obviously will substantially increase traffic flow. The Lane is used by walkers and cyclists and to allow for safer conditions would the Parish Council consider raising the possibility of traffic calming measures with the Authority? The NDP cannot influence past decisions nor stray into highways matters.
31	Yes – It is important to keep Black Bridge from becoming	I agree	I agree	I agree	It is a shame to see the Stagholt farm	N/A

	a rat run as this is used by walkers and also by many horse riders.				site be developed, but if it must be developed then I agree with the proposals in the NDP.	
32	<p>Generally OK.</p> <p>What does p7 Box 2 mean where it says “New housing is carbon neutral with higher standards than other development”? Are developments other than new housing not required to be of such high standard?</p> <p>Correct. The requirement will only effectively been made at the time of planning permission under building regulations.</p> <p>Further down the bullet points</p> <p>“There is a new village centre that serves the whole community” What is this talking about? Shops etc and not in one of the existing centres of our disbursed community? Won’t this disrupt the existing settlement pattern, or is it a wheeze to get new facilities into the new developments near Stonehouse. Won’t this leave the village hall and church out on a limb?</p>	<p>p27 I don’t like the sound of S1 para 4. “Areas E are not sustainable locations for development except under limited circumstances since they fail to fall within the Stroud District Settlement Hierarchy” - that “except under limited circumstances” is a real weasel phrase. If it means allowing putting up a shed, or home office, or granny flat (bet there’s a more pc term for that these days) against an existing property, then fine. If it means industrial or strategic development near the motorway junction, not good.</p> <p>The land is countryside where most types of development would be excluded but under most circumstances though some development may occur. No change.</p> <p>p29 Second line. soubuildings - typo?</p>	<p>paragraph 90, page 38 says “...since much of the identified route is likely to be immediately adjacent to the proposed development site.” Is this true? It only looks like a short stretch of the Stonehouse to Little Haresfield Multi User Track will be adjacent to the proposed development area. Will planning gain extend the benefit as far as Little Haresfield?</p> <p>The South Standish site is surrounded by the PROW and is thus affected. No changes</p>	<p>Don’t forget the history of the airfield which still is evident in the trackways and shelters. It has also produced the best wildlife grassland in the Vale part of the parish, right adjacent to the motorway.</p> <p>An assessment has been made in response to this comment and changes to the evidence,</p>		<p>The beautiful fields against Stonehouse are a lost cause, but if you keep emphasising their value, maybe something can be salvaged from the remnants along the open spaces.</p>

	Changes made	Correction made				
33						I would like to comment that I think the end result is comprehensive, positive and realistic. Thank you for all your hard work.
34	<p>We are happy with the wording of the vision but would like it to include a point on sustainable transport e.g. 'There are safe and pleasant multi-user sustainable transport routes'.</p> <p>Agreed – text added</p>	<p>We are happy with the wording of this policy.</p>	<p>Mostly agree with the wording of this policy. Would like to see the renewable energy generation target set at higher than just 10%.</p> <p>This is the figure suggested by Centre for Sustainable Energy and we have no evidence that a higher figure would be appropriate. No changes.</p>	<p>We are happy with the wording of this policy.</p>	<p>We are happy with the wording of this policy.</p>	

Appendix 3: Responses to Regulation 14 consultation from Statutory

Agency	Date	Name
Historic England	22/7/2020	David Stuart
Environmental Agency		Anita Bolton
Natural England	22/7/2020	Antony Muller
Pegasus Group	22/7/2020	Louise Follett (Robert Hitchins Ltd)United
GCC Planning	21/7/2020	Robert Niblett (senior Planning Officer)
GCC Minerals & Waste	17/6/2020	Laura Burford
Severn Trent	12/6/2020	Rebecca McLean
Sport England	11/6/2020	
Stroud District Council	31/7/20	Simon Maher
United Utilities	19/6/2020	Not our supplier (phone call)

Historic England

“Neighbourhood Planning and the Historic Environment” advice note sent. No specific comments.

Sport England

No Specific comments

GCC Minerals & Waste

No comment

Environmental Agency

Comment:

We note the draft NDP includes one site allocation referred to as (Stagholt Farm), we recommend completing the pro-forma to check the environmental constraints. This will help collect evidence, identify challenges, inform policy and assist delivery of sustainable solutions. Based on our Flood Map for Planning (Rivers and Sea), the south west corner of the site (marked area C in Figure 10 of the plan) appears to be located in Flood Zones 2 and 3 (Medium and High risk). Whilst we note it is proposed for the creation of a new wildlife and water management area, and is not currently identified for residential use, we would still recommend you refer to our guidance referred to above should the site come forward through the plan.

Furthermore we do not offer detailed bespoke advice on policy but advise you ensure conformity with the local plan and refer to guidance within our area neighbourhood plan “pro-forma guidance”. Notwithstanding the above, for example it is important that these plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth.

Response

At the time that the proposals come forward, a planning application will be required to consider flood mitigation and the extent and engineering of the river corridor/wildlife area can be agreed at that time.

No changes proposed.

Natural England

Natural England welcomes the parish's neighbourhood development plan. We wish to draw your attention to the potential need for further dialogue with Stroud District Council regarding the proposed Stagholt Farm 'S4' allocation. We note that policy S4 is carefully worded to the effect that this allocation, if developed, would do so as part and parcel of the wider Stroud District Draft Plan allocation PS19a.

Natural England is currently working with Stroud District Council and neighbouring local planning authorities in relation to the nearby Cotswold Beechwoods Special Area of Conservation (SAC). This collaborative project aims to ensure that the LPAs' local plans include suitable policy safeguards to protect this designated site from the effects of additional recreation pressure arising from new home building in the area as part of their respective local plans. Work so far indicates that the majority of visitors to this SAC travel from within 15km of the SAC boundary. The collaborating LPAs have therefore commissioned further work to identify suitable mitigation measures and a report is expected later this year accordingly.

As the Stagholt Farm allocation lies within the 15km zone around the SAC it will be necessary for the Parish Council and Stroud District Council to liaise in order to ensure suitable Habitats Regulations Assessment (HRA) of the proposal is incorporated into the neighbourhood plan's development. Given that your draft policy S4 makes clear the reliance of this policy upon the higher tier local plan's allocation PS19a there may be scope for the HRA associated with the Stroud District Draft Plan to address the necessary assessment. This will however depend upon the relative timing of the two plans.

Response

The Steering group requested a SEA and HRA screening opinion from Stroud District. This opinion was not provided but a letter indicating that SEA and HRA would probably be required was prepared and submitted to Locality as evidence that SEA and HRA support would be required. The SEA and HRA, including screening, has been completed by AECOM.

Pegasus Group

QUESTION 1 Do you agree with the vision for Standish? If not what alternative wording do you suggest? SNP Plan Period

2.1 The SNP proposes a plan period up until 2036, however the adopted Stroud Local Plan (Nov 2015), with which the SNP is required to be in 'general conformity' has a plan period up to 2031.

2.2 National Planning Practice Guidance¹ requires Neighbourhood Plans to be in general conformity with the adopted strategic development plan for their Neighbourhood Area, in this instance that comprises the Stroud Local Plan (2015), the newly adopted Gloucestershire Minerals Local Plan (2018-2032) which was adopted in March 2020, and the Gloucestershire Waste Core Strategy (2012-2027) which was adopted in November 2012.

2.3 Stroud District Council are currently undertaking a review of their Local Plan. The Regulation 18 Draft Local Plan was published for consultation in November 2019. The plan period of the Stroud Local Plan Review is up to 2040.

2.4 While the SNP acknowledges the need for growth in the Neighbourhood Area in accordance with the emerging direction of the Stroud Local Plan Review (SLPR) this is currently a draft plan that has not been subject to the scrutiny of independent Examination therefore the growth assumptions and draft site allocations within the SLPR may yet be subject to change.

2.5 We are aware that the current published Local Development Scheme (dated September 2017) for the Stroud Local Plan Review is being updated due to the coronavirus pandemic.

2.6 It is suggested therefore that the plan period of the SNP should be up to 2031, not 2036 as proposed, to be in general conformity with the adopted Stroud Local Plan which provides both strategic and non-strategic planning policies for Stroud 1

District and the Standish Neighbourhood Area in accordance with paragraphs 17 and 18 of the National Planning Policy Framework⁴.

"17. The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in: a) joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or b) a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred.

18. Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies."

2.7 The SNP, once made, will provide additional non-strategic planning policy to be taken into consideration during decision making and it will comprise part of the development plan for the Standish Neighbourhood Area.

2.8 Currently, as the adopted Stroud Local Plan only covers the period to 2031, there is no adopted local plan for the SNP to be in 'general conformity' with for the period 2031 – 2036. Therefore, the plan period of the SNP should be up to 2031 to be in general conformity with the adopted Stroud Local Plan. In due course, once the Stroud Local Plan Review is adopted the SNP could be reviewed and provide non-strategic planning policy as part of the development plan for the plan period up to 2040. SNP Vision

Response

The NDP sets out in para 43 and 44 that, in line with planning practice guidance, the NDP is working with the emerging policies. The LPA's response did not question the timetable of the NDP. The November 2019 consultation on the Local Plan review stated in para. 1.2 that the plan looks "up to 2040" . The SEA recommended that the plan period extent to 2040 and this change has been made.

2.9 With regard to the Vision for Standish as described in Box 2 of the SNP, concern is raised over the bullet point requiring that; "New housing is carbon neutral with higher standards than other development"

2.10 Attention is drawn to the Secretary of State's Written Statement to the House of Commons (25th March 2015)⁵ which stated that;

"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance. Neighbourhood plans should not be used to apply the new national technical standards." (emphasis added)

2.11 The adopted Stroud Local Plan (2015) does not contain locally evidenced adopted technical standards for housing design prepared in accordance with the national planning practice guidance⁶. Core Policy CP8 'New Housing Development' Criteria 4 requires new housing development to; "Use sustainable construction techniques and provide renewable or low carbon energy sources in association with the proposed development"

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

2.13 Moreover, Stroud have a Sustainable Construction Supplementary Planning Document (SPD) which was adopted by the Council on 16th February 2017. The purposes of the SPD is to advise and inform developers on a range of sustainability issues potentially relevant to their development.

2.14 It is quite clear that the policies of the adopted Local Plan do not go beyond the Building Regulations, therefore while it is appreciated that the SNP vision is aspirational, the vision statement requiring new housing development to be carbon neutral 'with higher standards than other development' is not in general conformity with the adopted local plan, nor does it comply with national planning practice guidance which requires optional standards to be established through the Local Plan process not through Neighbourhood Plans.

2.15 Emerging Core Policy CP1 of the Stroud Local Plan Review seeks to achieve carbon neutral development within the authority by 2030, however this policy is 5

<https://www.parliament.uk/business/publications/written-questions-answersstatements/written-statement/Commons/2015-03-25/HCWS488/> 6 <https://www.gov.uk/guidance/housing-optional-technical-standards> Robert Hitchins Ltd & Redrow Homes Ltd Standish Neighbourhood Plan Regulation 14 Public Consultation Representations not yet adopted, it needs to be supported by published evidence including a viability appraisal and considered through a local plan examination in accordance with national planning practice guidance.

2.16 Meanwhile it may be more appropriate for the SNP to reference the National Design Guide (2019)⁷ with regard to these matters.

Response

Stroud District has declared a climate emergency and as part of the support for the NDP, officers indicated that new sustainable building requirements were being prepared. The NDP steering group consulted the Centre for Sustainable Energy for advice in the face of this vacuum and their model policies and approach have been used in the NDP. The recent White Paper also indicates that the Government will be raising its requirements to deliver more sustainable development in the future that helps England reach zero carbon in 2050. It is disappointing that a developer such as Hitchins is objecting to sustainable construction and the policies in this NDP, indicating that the preference is for less efficient and carbon emitting development. The community was clear in its vision that it wishes to strive for carbon neutral development and no change is made accordingly.

2.17 Concern is also expressed over the vision for; 'a new village centre that serves the whole community'. Standish currently has no nuclear centre, as evidenced in the accompanying neighbourhood plan evidence documents published as part of the Regulation 14 public consultation.

2.18 The text of the SNP does not state where a new village or local centre should be delivered and yet it is included within the vision for the Neighbourhood Plan. Policy S1 describes most areas of the parish as inappropriate or unsustainable for development, with only that part of SA2 (Great Oldbury) within Standish Parish and area 'G' identified at Figure 7 considered suitable for development within the provisions of SNP Policy S2, by implication it is reasonable to assume that the SNP considers that a new village centre could be located within this area.

2.19 Particular concern is raised if the SNP considers that a new village centre should be delivered at SP19a.

2.20 Representations for site SP19a submitted to the Stroud Regulation 18 consultation on behalf of Robert Hitchins Ltd indicate that the site could accommodate approximately 700 dwellings without a new primary school and approximately 666 dwellings with a new one form entry primary school. Emerging indicative draft proposals for SP19a do not include a new local centre as this is already provided for elsewhere within Greater Oldbury as part of an approved masterplan for the adopted strategic allocation (s.14/0810/OUT).

Response

A development of between 650 and 700 dwellings cannot be provided without accompanying infrastructure. The people who will live the new dwellings will need places to meet, learn and exercise. This should be provided by the new development. The LPA response to the Reg. 14 draft has not questioned this requirement. The policy seeks to allow existing residents to have equal access to any new infrastructure. This is also fair and justifiable. The policy wording has been amended to show that the centre would be part of the new development.

QUESTION 2 Policy S1 seeks to provide a decision-making framework to ensure that development is directed to suitable locations and that new development protects Standish's most important characteristics.

3.1 The proactive approach of the SNP towards the consideration of the future development of site SP19a is welcomed. However, until the growth requirements of the Stroud Local Plan Review are established through its examination, (and the full extent and infrastructure requirements of this site are known through the adoption of the Stroud Local Plan Review, including the preparation and examination of an associated Infrastructure Delivery Plan (IDP) and Viability Appraisal,) it is suggested that the SNP should not include text or maps that relate to the site as the size and extent of the allocation may be subject to change.

3.2 The response provide by Pegasus with regard to this question relates solely to Area G as defined by Table 1 and Figure 7 of the SNP.

3.3 Table 1 defines Area G as; "Local Plan Strategic allocation PS19a/South Standish." Whilst acknowledging the support for the site, Pegasus draw attention to the fact that PS19a is identified as a draft allocation in the Regulation 18 Stroud Local Plan Review public consultation, therefore the boundaries of area G may yet change in the Regulation 19 Pre-Submission public consultation version of the Stroud Local Plan Review.

3.4 Policy S1 Standish Development Framework states at criteria 5 that; "Area G will be subject to NDP policy S2/Great Oldbury and will be referred to as South Standish."

3.5 Figure 7 annotates Area G 'PS19a (650 dwellings, 5ha employment)', however Pegasus can confirm that the part of the draft allocation being promoted by our client can accommodate up to 700 dwellings without a primary school and approximately 666 dwellings with a one form entry primary school.

3.6 It is noted that land promoted by our client does not comprise the whole PS19a draft allocation (i.e.: the whole of Area G) as it does not extend up to the railway, this is clearly shown in the Wider Context Indicative Plan at Appendix 1. APPENDIX 1 – WIDER CONTEXT PLAN FOR PS19A

3.7 The quantum of development proposed across the whole of Area G through the Stroud Local Plan examination may yet be amended from the 650 dwellings proposed in the Regulation 18 consultation. The housing requirement is based upon the Government's Standard Method, the Standard Method is currently under review and consequently the Local Plan will need to take into account any changes before it is submitted for examination. Changes to the overall housing requirement for Stroud District may arise through the Local Plan Examination which will take into account matters such as the emerging Gloucestershire Industrial Strategy and the inward investment requirements of Gloucestershire Local Enterprise Partnership (LEP).

3.8 Moreover, housing allocations in Local Plans are expressed as minimum figures rather than maximum figures.

3.9 Pegasus consider that it is correct that Area G should be identified as suitable for development by the SNP, but that the quantum of development to be delivered at the draft allocation should not be annotated on Figure 7.

Response

This is a good point but at the time of writing, the boundaries shown are the most accurate estimates available. It may be necessary to amend the maps and description at a later stage of NDP preparation such as at Submission or Examination stages.

3.10 Criteria 6 of Policy S1 states that; "Development will respect the character identified in the Standish Landscape Assessment and will seek to avoid harm to the tranquillity of the countryside, generate a biodiversity net gain, and avoid flooding by use of effective water management regimes such as Rural SuDS and the retention of natural areas adjacent to water courses."

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

3.12 Robert Hitchins Ltd commissioned a Landscape and Visual Appraisal of Land Parcel PS19a by MHP Chartered Landscape Architects which was submitted to Stroud District Council as part of representations to the Regulation 18 Local Plan Review in January 2020 and is attached at Appendix 2 of these representations. APPENDIX 2 – MHP LANDSCAPE AND VISUAL APPRAISAL OF PS19A (AUGUST 2019)

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

3.14 Landscape character, biodiversity net gain, the delivery of strategic green infrastructure, surface water flood risk management and easements to existing water courses for management purposes are all matters that would be dealt with as a matter of course by our client through the submission of a planning application for the site, with any mitigation required addressed through any accompanying Environmental Statement. These are also matters that are covered by strategic and non-strategic policies of the adopted Stroud Local Plan (2015). Therefore, Criteria 6 of Policy S1 of the SNP adds nothing further to the adopted policies of the Stroud Local Plan and should be deleted.

Response

This does not require a change. However, it should be noted that the Illman Young Landscape Appraisal was for the entire parish and not only PS19a. It therefore contains broader considerations than the MHP report.

QUESTION 3 Policy S2 sets out a framework for how the proposed new housing site referred to in the draft emerging Local Plan (November 2019) should be developed. The site is renamed “South Standish” rather than “Northwest Stonehouse or PS19a).

4.1 The relationship between 'South Standish Development Principles' and Policy S2: 'Major Development in South Standish' is unclear as many of the development principles are subsequently repeated in Policy S2.

4.2 As the text of Policy S2 will in time be used by decision makers these representations focus on the Policy. Policy S2 requires proposals for 10 dwellings or more, or development at PS19a (referred to in the SNP as South Standish) to submit a masterplan; "... to be produced in consultation with the Parish Council and community in the design stages of the scheme as set out in the South Standish Development Principles."

4.3 The South Standish Development Principles state; "A masterplan will be prepared in consultation with the Standish Parish Council and meaningful pre-application engagement will take place that will allow the Standish Community to have their views reflected in the overall site layout , design and access;"

4.4 The starting point for the preparation of any policy in a development plan document, including a neighbourhood plan, is the National Planning Policy Framework (Feb 2019) (NPPF)⁸. The NPPF states at paragraph 128 that; "Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of Representations the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."

4.5 However, it is emphasised that this statement in the NPPF is made in the context of Section 12: 'Achieving well designed places'.

4.6 The NPPF is quite clear at paragraphs 39 and 40 that while it is good practice for applicants to engage with local communities at the pre-application stage, that local authorities can only encourage developers to do so where they are not already required to do so by law. There is, de facto, no mandatory requirement in the NPPF for pre-application engagement with a local community.

4.7 The Planning Practice Guidance (PPG)⁹ also advocates pre-application engagement as good practice in terms of a collaborative process between an applicant; the local planning authority; statutory and non-statutory consultees, elected members and local people. However, there is no mandatory requirement for an applicant to do so where they are not already required to do so by law.

4.8 The Stroud Statement of Community Involvement (Nov 2017)¹⁰ aims to; "...provide all sections of the community as well as any other interested parties with the best and equal opportunity to easily become involved with the plan making and planning application processes in the most transparent and efficient manner."

4.9 Section 12 Development Control – 'How we will engage the community on planning applications' states at 12.5 that; "Developers are strongly encouraged to discuss their proposals with the local community as well as the Council, before submission. "

4.10 Paragraph 12.6 states that; "The Council cannot refuse to accept a valid planning application if a developer has not carried out prior community involvement or is dissatisfied with the way any involvement has been carried out. However, failure to do so can result in material objections being raised at the application stage which may have been avoided had early community involvement been undertaken." (emphasis added)

4.11 It is clear from all the above that the SNP cannot 'require' a site masterplan to be produced in consultation with the Parish Council and the community as a matter of planning policy as currently written in draft Policy S2. Community engagement can be 'requested' as a matter of good practice, but it cannot be 'required'. The plan is justified in recognising the value of early community engagement, but equally there is no statutory basis for requiring it.

4.12 Moreover, there is no jurisdiction over the input of the local community in collaboration with a developer being found suitable by the local authority, or their associated internal or external consultees on submission of such a masterplan. It is for the local planning authority to determine a planning application by weighing the merits of the scheme in the planning balance when considered against the policies of the adopted development plan read as a whole.

4.13 All planning policy should be drafted using the term 'should', not 'will', as planning policy is subject to interpretation by a decision maker. 4.14 Policy S2 continues to list a series of documents that should accompany any application at SP19a as follows; • A Consultations Statement • A Community Infrastructure Access Study • A Countryside and Wildlife Plan • A Transport Statement/Assessment • A Sustainability Statement • An Energy Statement • A Lighting Strategy • A Landscape and Visual Impact Assessment 4.15 This list of submission requirements is considered overly prescriptive as while applicants can be encouraged to submit the statements or information as set out, it cannot be a neighbourhood plan requirement. Information that is required to be submitted with the planning application can only be determined by the Local Planning Authority through the local validation requirements. This is set out in Regulation 11 of the Town and Country Planning (Development Management Robert Hitchins Ltd & Redrow Homes Ltd Standish Neighbourhood Plan Regulation 14 Public Consultation Representations Procedures) Order 2015. The scope of what can be covered by a Design and Access Statement can however be expanded to cover matters such as how community engagement has been influential in design issues.

Response

It is extremely disappointing to read that the applicant and Pegasus see that consultation with local communities is good practice but that they have not followed good practice (because they were not required to but only strongly encouraged to do) when preparing their proposals for PS19a. The Standish Community has not been consulted in the preparation of the proposals attached as part of this representation. The White Paper clearly supports the use of masterplans and design criteria developed in consultation with the local community. It is suggested that Pegasus should review its methodology. The requirements in Policy S2 were not questioned by the LPA in their response. No changes made. [NOTE, this is the response to the letter at that time – since then, as set out elsewhere in the document, Pegasus have changed their stance and have meaningfully considered the Parish Council's concerns in a meeting.]

4.16 The Stroud Local Validation Checklist¹¹ provides guidance on what supporting information is required to be submitted with either an outline or full planning application, it is not for the Neighbourhood Plan to add to this list or to introduce new requirements such as the need for additional supporting technical statements.

4.17 Moreover, the evidence base supporting the neighbourhood plan is not subject to full public examination or cross examination at Hearing Sessions and therefore cannot be considered to be as robust as the evidence prepared by the local authority to support the Stroud Local Plan Review. The Neighbourhood Plan evidence base cannot therefore be used as a starting point for the preparation of technical documents to support a planning application e.g.: The Standish Neighbourhood Plan Landscape and Visual Appraisal.

Response

The Neighbourhood Plan has been prepared using published evidence or evidence prepared by suitably qualified professional advisers. It can be used to form policies in the Development Plan, as set out in NPPF paras. 28-30.

4.18 Pegasus consider that the text of Policy S2 should be amended to reflect the representations made above. The comprehensive Stroud Local Validation Checklist should be relied upon by the SNP in order to ensure that all the matters to be addressed in the supporting documents currently listed at S2 in the Reg 14 version of the SNP are adequately considered through the planning application process.

4.19 Our clients have submitted evidence to the Stroud Local Plan Review Regulation 18 public consultation that demonstrates development at SP19a will have connectivity with the consented development at strategic allocation SA2 and which will provides new strategic green infrastructure including sustainable transport and wildlife corridors.

Response

The evidence submitted by Pegasus' clients for the purposes of the Local Plan Review have not been prepared with full knowledge of the local community views because no consultation has been undertaken. The proposals must take full account of all relevant material planning matters that have been identified in the course of the preparation of the NDP. No changes made.

QUESTION 4 Policy S3 identifies important routes for walking and cycling, and also where additional motorised transport should be avoided.

5.1 Pegasus make the following representations with regard to Policy S3: Sustainable Transport and its associated Sustainable Transport Evidence Paper (April 2020).

5.2 Pegasus do not consider that the development of that part of PS19a being promoted by our client's site would impact on all the footpaths or bridleways listed at paragraph 87. Review of Figure 10 demonstrates that only the following would be affected; • Eastington Footpath 7 • Standish Footpath 30 • Standish Footpath 31 • Standish Footpath 32 • Standish Footpath 6 • Standish Bridleway 16

5.3 Pegasus consider that the text of this chapter and the background evidence paper as written suggests that the development of PS19a will have a negative impact on existing Public Rights of Way (PROW) e.g.; "Potential harm that could arise to the PROW network by introducing a strategic development" (p.5 of Sustainable Transport Evidence Paper)

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

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

Response

Until the final strategic allocation site is adopted by the LPA, it is not possible to identify which footpaths will be directly affected. However, those listed in this para are all either adjacent to or contained within the proposed PS19a site. Should the site boundaries be changed as the Local Plan review progresses, then these footpath requirements may be adjusted. This can be reflected in changes at Submission or Examination stage of the NDP's preparation. However, based on current knowledge, proposals on the site PS19a will increase use and importance of this PROW network. The Stonehouse NDP sets out specific requirements for footpath improvements that the Standish NDP carries these requirements forward for the benefit of all residents in Stonehouse and Standish parishes and visitors. No changes made.

5.6 Pegasus note the evidence provided in the Sustainable Transport background paper but draw attention to the fact that the 'identified' route of the 'Access improvement Multi-User Track - B4008 between Little Haresfield and Stonehouse' referred to at paragraph 10 of the evidence paper is not published as part of the consultation documentation.

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

Response

The proposed route is incorporated into the route shown in Figure 9. Support for this was received in a letter from the PROW officer John Lane, 14 July 2015.

5.8 Turning to Policy S3, any financial contribution sought from the development of PS19a to PROW in Standish as part of a S.106 agreement would need to be 'fairly and reasonably related' to development proposals in order to comply with paragraph 56 of the NPPF and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. Paragraph 56 of the NPPF is cited below; "56. Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development"

5.9 Any off-site PROW S.106 contribution requests would be considered with other requests for S.106 contributions and considered in the context of a development viability appraisal. Even if the SNP were 'made' and part of the development plan it may not be possible for all requested contributions towards PROW to be met. It would be for a decision maker at Stroud District Council to negotiate such a S.106 agreement.

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

5.11 With regard to the last paragraph of draft Policy S3, the SNP cannot 'require' contributions to off-site PROW works nor should the term 'will' be used in the text of the Policy. Contributions could be sought by the Highway Authority for these works through consultation on any planning application but the SNP cannot categorically require that they are paid for the reasons outlined above, i.e.: that development schemes attract competing S.106 financial requests. Robert Hitchins Ltd & Redrow Homes Ltd Standish Neighbourhood Plan Regulation 14 Public Consultation Representations

5.12 Pegasus request that the text of Policy S3 be amended accordingly to address these representations.

5.13 Any alterations to PROW within our client' site as a result of new development would be addressed through a planning application and therefore would, in any event, be considered against the provisions of Policy CP14 criteria 13 of the adopted Stroud Local Plan (2015) which states that; "High quality development, which protects, conserves and enhances the built and natural environment, will be supported. Development will be supported where it achieves the following: 13. Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport...

Response

Agreed. LPA changes to wording have been made.

QUESTION 5 Policy S4 allocates land at Stagholt Farm and proposes new uses for the site. Do you agree with the wording of this policy?

6.1 Pegasus have no comment to make on Policy S4 other than the site is situated to the south east of the site our client is promoting such that synergy over matters such as green infrastructure, wildlife corridors and public rights of way connectivity should be ensured with our client's site through the text of any SNP Policy that allocates the site.

7. QUESTION 6 Are there any land use planning matters not addressed in the plan, which you think should be addressed? Can you please describe what you believe is missing or in need of correction?

7.1 Pegasus have no comments to make with regard to this matter.

CONCLUSIONS

8.1 In conclusion and to summarise the representations made above the following are proposed as amendments to the SNP with regard to SP19a;

- Amend reference to the recently adopted Gloucestershire Minerals Local Plan
- Amend the plan period of SNP to 2031 to be in general conformity with the adopted Stroud Local Plan (2015)
- Remove annotation to quantum of development for Area G on Figure 7: Standish Parish Character Areas.
- Delete criteria 6 of Policy S1
- Amend text of Policy S2 in light of Pegasus representations
- Amend text of Policy S3 in light of Pegasus representations

Response

See comments above

GCC Planning

Ecology Comments

SEA/HRA Screening advice for the Plan

Looking at biodiversity (ecology/wildlife) alone the need for a Strategic Environmental Assessment (SEA) and/or Habitats Regulations Assessment (HRA) of the draft consultation version of the NDP appears unlikely. The District Council and Natural England should be able to give a definitive view on these matters, if not already.

Response

The Steering Group requested a SEA and HRA screening opinion from Stroud District. This opinion was not provided but a letter indicating that SEA and HRA would probably be required was issued from the LPA. The letter has been accepted by Locality as evidence that SEA and HRA support would be required. This has been agreed in principle and the assessments are in preparation.

Planning Policy Context document

The accompanying planning policy context document indicates that the NDP will provide green infrastructure which will include accessible natural green spaces which is welcomed. Also helpful for nocturnal wildlife is the intention to strongly resist the use of street lights that would cause illumination of the surrounding countryside. This is reflected in proposed policy S2 in the main (draft) NDP document.

We can see that some nature conservation constraints shown on the Gloucestershire Minerals and Waste Proposals Map have been taken into account in formulating the NDP.

Please note that since early 2019 the Key Wildlife Sites in the County have been renamed to simply 'Local Wildlife Sites' (paragraph 21 and Figure 5). Figure 6 in the Planning Policy Framework document should be corrected to say 'Strategic Nature Area' not Strategic Nature Reserve.

Response

Changes made to evidence paper.

Please correct the partnership reference to read the 'Gloucestershire Local Nature Partnership' (beginning of the fourth paragraph within the Summary of Evidence box).

Response

Changes made to evidence paper.

The Draft NDP document

The topic of biodiversity (ecology/wildlife) is adequately covered.

Please correct the partnership reference to read the 'Gloucestershire Local Nature Partnership' (beginning of the fourth paragraph within the Summary of Evidence box).

The Strategic Nature Areas (SNAs) derived from the Gloucestershire Nature Map are likely to be partly or wholly within a new Nature Recovery Network being drawn up by the Local Nature Partnership -

<https://www.gloucestershirenature.org.uk/nature-recovery-network>).

The final version of the main NDP document may need to update any SNA references to the new Nature Recovery Network (i.e. paragraph 58).

Response

Noted, but no change made now.

Biodiversity

The draft NDP gives some support for the conservation and enhancement of local biodiversity. Green space, landscape character, ecological networks (wildlife corridors) and SuDS are being given value. The proposals have some consistency with the Gloucestershire Local Nature Partnership's Strategic Framework for Green Infrastructure. Proposed Policies S1, S2 & S4 are appropriate. Overall there are no compelling ecological reasons to recommend any change to the wording of the proposed NDP policies which seem to fit in with county objectives for the natural environment.

Response

No changes.

Flood Risk Management Comments

Overall we support the NPD's approach to planning sustainable water management. The NDP recognises and promotes how SuDS features can be utilised within the green space network. The NDP in general doesn't recognise the multi-functional benefits of SuDS in relation to development such as amenity, biodiversity and water quality however the primary driver of SuDS for flood storage is well captured within the document.

The document does not recognise the fact that a swathe of land from the railway line to the M5 via Standish (along the Arlebrook) lies in Flood Zone 3. This should be overtly specified within the plan and policies adjusted to suit. Similarly, there are areas at risk of surface water flooding spreading NW towards the M5, particularly though Standish, Moreton Green and Little Haresfield, which must also be taken into consideration, specifically with regards to built development.

Response

Text added

Specific comments include:

Page 7, four policies table, Development Framework Policy 1 Column In principle we support the statement however it could be reworded to take out the word 'rural' in line with standard industry language recognising SuDS features are both rural and urban features. Furthermore the sentence could be worded in such a way to 'minimise flood risk to new development whilst seeking to capitalise on opportunities to reduce flood risk to existing developments' rather than using the word 'avoid' and how it's phrased.

Response

Changes made

Page 7, four policies table, Development Framework Policy 1 Column: A statement should be included to state that residential development will not be supported in Flood Zone 3.

Response

Changes made

Page 7, four policies table, Strategic Development Policy 2 Column We do not support the use of 'most homes will go to the sewer.' Building Regulations hierarchy of surface water discharge should

be followed where surface water is discharged preferentially to a soakaway, if this is not possible then to a watercourse and finally if either of these are not possible to a sewer.

Response

This is a community aspiration and will not be changed but the advice has been reflected in the policy.

Page 7, four policies table, Housing allocation Policy 4 Column All new developments should seek to use sustainable water management measures such as rainwater harvesting to make efficient use of water resources. Also that risk of flooding from surface water will be taken into consideration when allocation new sites.

Response

No changes made because it is unclear what it being sought. Perhaps this can be clarified in Submission stage.

Page 14 paragraph 30. Instead of calling this SuDS it should be called Natural Flood Management (NFM). However using the case study between Stroud District Council and GWT is fully supported and we encourage how the plan's aspirations to roll this out to other land owners.

Response

Addition of NFM

Page 14 paragraph 30, or separate paragraph: Specific mention should be made of the substantial corridor of land within Flood Zone 3 and those areas at high risk of flooding from surface water, with the restrictions on development accordingly. Preferably an additional map could be used to depict the extents (assistance with this could be provided).

Response

A new paragraph was added

Page 21 We support the use of the Local Nature Partnerships benefits including flood risk and water quality.

Page 27, take out the word 'rural' before SuDS and say 'using SuDS (including rainwater harvesting, NFM and retention of natural areas adjacent to watercourses.' Please note watercourse is one word

Response

Change made

Page 27 - There could be a small paragraph stating new culverts will only be installed where necessary however all opportunities will be taken to deculvert sections of channel where possible.

Response

Change made

Page 31- Section 2C – We support the proposal to use existing watercourses for flood resilience and for wildlife habitats. However, it could be mentioned a range of habitats is beneficial for species diversity with a range of surface water flow types and meanders in the channel being preferable.

Response

Text added to policy

Pages 31 - Section 2E – Building Regulations hierarchy of surface water discharge should be followed and not straight to the sewer i.e. infiltration by means of a soakaway, then discharging to a watercourse then a sewer

Response

Severn Trent Water provided policy wording which has been included which allows for sewers to be provided as part of a Sewerage and Drainage Masterplan which has been include in S2. It is hoped that this will be acceptable to the Flood Authority.

Stagholt Farm – An appropriate easement of at least 8ms between the development and watercourse should be provided for riparian maintenance.

Response

Text added to policy

Appropriate SuDS features will be used throughout the development, not just in section C on the map. These could include, but are not limited to, porous paving, water butts and swales. This will allow surface water management through the entirety of the development. SuDS chosen should encompass the four pillars of SuDS flood storage, water quality, biodiversity and amenity.

-All properties should use rainwater harvesting to allow for a more sustainable use of rainwater.

Response

Text added to policies

Archaeology Comments

Historic England provides guidance on developing neighbourhood pla

<https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/>. It provides useful information about gathering evidence on the historic environment and provides some helpful case studies. As baseline information the Historic Environment Record (including historic characterisation data if available) and data from The National Heritage List for England (for designated heritage assets) should be included in the plan. I also attach Historic England's advice note.

The draft plan at the moment does not follow guidance as set out by Historic England and should include a more comprehensive section on the Historic Environment to include all known designated and non-designated heritage assets in the parish, including the useful information already set out in the 'History and Context' section. It should be noted that proposed development sites may require further archaeological investigation which can reveal significant heritage assets with archaeological interest which can affect the deliverability of future development proposals.

Response

Listed buildings are shown in the Planning Policy Context evidence in Figure 10 but it was not felt necessary to reproduce this in the NDP since none of the policies directly affected a listed building. The NDP sets out specific policies that are unique and elaborate Local Plan policies. Regarding the historic environment, Local Plan policy ES10 will apply and it is therefore not necessary for this to be repeated in the NDP. No changes made.

Network Rail

Comment

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to also include any developer contributions to fund such improvements with an appropriate legal agreement linked any planning permission.

Allocation at Stagholt Farm – Policy S4 provision of 24 new dwellings

The following should be considered during the master plan of the site: -

If not already in place, the Developer must provide, at their own expense, a suitable trespass proof steel palisade fence of at least 1.8m in height adjacent to Network Rail's boundary and make provision for its future maintenance and renewal without encroachment upon or over-sailing of Network Rail land.

Soakaways, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property.

Where trees/shrubs are to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway.

The Impact on Stagholt level crossing and any subsequent LCs within the plan area should be assessed in any Transport statement submitted.

Response

Agreed. This has been added into the NDP.

PRoW Network – Footpath 6 and Footpath 2

Any development of land which would result in a material increase or significant change in the character of traffic using a rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

There are three Level Crossings in the plan area: -

1. Standish 9 – A public Footpath Crossing at BGL2 99 miles 45 chains
2. Standish 12 – A Public Footpath Crossing BGL2 99miles 71chains
3. Stagholt – A Public Footpath Crossing BGL2 100miles 73chains

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation

with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrian's ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- **By any development or enhancement of the public rights of way**

Network Rail has already expressed concerns in relation to Stagholt footpath crossing (BGL2 100m 73c) though a planning application (**2020/0249/EIAS**) for up to 720 residential dwellings. These concerns were expressed on the grounds of increased pedestrian usage.

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the three level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010) to requires that ... where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".

Response

Agreed. Wording and policy inserted.

Severn Trent Water

S2 Major Development in South Standish (pg30&31) – Severn Trent are supportive of the master planning approach. We are supportive of point (e), the proposition for the site to be drained to the mains sewerage network and we would encourage master planners and developers to get in contact with Severn Trent at the earliest opportunity to determine connection locations and ensure that the downstream network has available capacity.

Response

The Flood Authority was concerned about the inclusion of a requirement for mains sewers. The policy wording therefore supports mains sewers in consultation with the statutory providers. If this wording is insufficient, it can be modified at the Submission stage.

We would encourage you to include within this section a requirement for the development of a Sewerage and Drainage Masterplan. This is particularly important if there will be multiple developers for the full site as there may be a need for the developers to work together towards one overall drainage strategy. The following wording would be recommended for inclusion:

‘Development must provide a Sewerage and Drainage Masterplan, demonstrating consideration of the timing and phasing for necessary infrastructure provision at an early stage within the planning process to enable strategic infrastructure to be designed appropriately.’

We would also recommend the inclusion of policy wording to ensure that the drainage hierarchy is adhered to and considered within the masterplan. Details on the drainage hierarchy are found within Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323). The following wording is recommended:

All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.

Within the sustainability statement we would also encourage you to include policy wording requiring water efficient design. We are supportive of the use of water efficient fittings and appliances within new properties, we encourage of the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. The following wording is recommended:

Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Development should demonstrate that they are water efficient, where possible incorporating innovating water efficiency and water re-use measures.

For your information we have set out some general guidelines that may be useful to you.

Response

All policy wording changed as indicated.

Stroud District Council

NDP section or policy	SDC comment	SDC recommendation	NDP response
P7	The second table on this page gives a good breakdown of how elements of the vision have been categorised into the policy headings, however the preceding sentence could lead to the table being interpreted as the actual policies	Change the sentence preceding the policies table from "...in four policies" to "...under four policy headings"	Changes made
P10, para 9	This paragraph should make clear the difference between the Parish of Standish, and what is being described as the "village" of Standish. The NDP applies to the Parish as a whole which includes open farmland, Cotswold escarpment etc., as well as small businesses.	In spatial planning terms, the residential aspect of Standish Parish may best be described as a collection of small hamlets, including Stroud Green, Little Harsefield, and Standish, which are locally felt to be one community.	Changes made
P19, para 35	Although the conclusion of this paragraph is correct, in that the Parish of Standish is deemed open countryside as it is entirely outside settlement development limits, there seems to be confusion as to the difference between a settlement and a parish. The town of Stonehouse is designated as tier 1, not the parish of Stonehouse, much the same as the nearby village of Eastington is	Review wording	Added the word "parish" to indicate that the sentence referred to the parish as a whole

	deemed to be a settlement, and is therefore ranked in tier 3, but the Parish of Eastington is a separate entity and not part of this designation. Within the Parish of Standish, there is no settlement deemed large or dense enough to be Review wording designated within the settlement hierarchy.		
P19, para 40	This relates to the above comment on para 35 and needs to make clear that it is referring to Standish as a village, and not the parish of Standish.		Added the “parish” to clarify. The reference was for the entire parish not the village.
P21, Standish Development Framework	Consider an introductory paragraph explaining what the Standish Development Framework is. The term “development framework” is often associated with a suite of planning documents for a particular area(i.e. Local Development Framework, or LDF), whereas this is more of a zonal planning guide		Carefully considered whether to introduce “zones” in the text. However, decided against this because zoning is not what the NDP seeks to do – zones are very prescriptive and the NDP seeks to consider the parish in terms of landscape types which is more flexible.
P21, para 44	The description of Standish as a rural parish of scattered hamlets is perhaps a better term to use in relation to the comment above on P10, para 9		This appears to be a comment and no changes made
P21, para 46	Provide a citation or source for the Strategic Green		Citation added

	Infrastructure designation		
P22, para 51	See previous comments on settlement designations and why this doesn't apply to a parish as a whole.		Added "parish".
P23, para 54	As it stands this paragraph is very emotive and does not refer to any evidence to back up the points	Refer to landscape studies and reports to give an unbiased and professional overview of the potential landscape impacts.	The ways that the harmful impact will be felt are listed in the paragraph and these are all material planning matters. This is a summary of the previous argument and does not need to be referenced again. No change.
P23, para 55	Refer to the landscape evidence which supports this.		Reference added
P23, para 56	This policy could be simplified to be simple "hook" into the Standish Development Framework. This would also require some rewording to Table 1 to incorporate some of the bullet points of the policy, but as cross referencing from the policy to the table would be necessary anyway, the result should be a simpler policy to interpret.	Change policy to "Development should be appropriate to the area and development principles as set out in the Standish Development Framework". Review the wording of Table 1 as appropriate.	Believe that the reference is to para 65 and not 56. Text added
P28, para 69	The reference to the effect on the PRoW being "adverse or strongly adverse" needs to cite the evidence from which this impact has been concluded.		Reference added
P28, para 70	As above, the "significantly adverse" effect needs a citation to a study. "Effect"		Reference added

	should also be changed to “impact”.		
P29, para 70	Typo in 2nd to last sentence		Correction made
P29, para 73	Changing the name of the sites in the NDP may cause confusion when interpreting the policy and cross referencing between the NDP and the Local Plan		This was the wish of the Steering Group – no change made
P30, South Standish Development Principles	Bullet points 2 and 7 are the same		Repetition deleted
P33, para 75	Provide citation for traffic statistics		Citation provided
P39, S3: Sustainable Transport, para 2	The phrase “will be expected to...” implies that development will have to contribute, which is not the case.	Change wording to “Development will be supported where a reasonable contribution towards...”	Change made
P39, S3: Sustainable Transport, final paragraph	As above, the NDP can’t stipulate a requirement for a contribution, but can express the parishes support for development which does contribute		Added “will be supported”
P42, S4: Stagholt Farm	The policy states that the site is allocated as “a housing site”, but goes on to list B class use and tourism within the proposed development		Changed “housing” to “mixed use”

A late response was received from Sarah Williams, Senior Planning Officer and Dr David Land, Principal Transport Planner: Strategic Infrastructure, Gloucestershire County Council (Their comments in green)

Following an on-site consultation meeting on 15th October 2020

COMMENTS	
<p>There are two distinct proposals;</p> <p>I) local connectivity into a current development and local connectivity into a strategic allocation site, and;</p> <p>II) a strategic corridor linking Stroud and Gloucester.</p> <p>We think your focus should remain upon local objectives The strategic corridor is already in the ambition of the Local Transport Plan. However, your endeavours may result in a 'stepping stone' as it were, to allow GCC to extend the possible multi user facility (travelling north towards Standish from Stonehouse via the strategic allocation site), onwards to Gloucester (However, as discussed, there is no funding available at present).</p>	<p>Both need to go in NDP - but this is advice on implementation</p> <p>If NDO doesn't also include the strategic elements, it cannot hope to gain developer contributions towards them (since no HA funding is available at present!)</p>
<p>It would very much benefit your proposals if they became part of the planning process.</p> <p>Identify your ambitions and the scope for onward connectivity in your forthcoming Neighbourhood Development Plan GCC Transport Planning will identify the desire lines for your routes in the emerging Local Cycling and Walking Infrastructure Plan for Stroud, (although there is no existing funding for any proposals)</p>	<p>Yes</p>
<p>Include maps of both the local and strategic routes in your NDP</p>	<p>Done</p>
<p>You have already undertaken some work but still have funding available (in the region of £20k) to continue developing the proposals</p> <p>We think your funding would be best used at this stage to:</p> <p>a) Develop the specific route, design and style for your proposal – we would suggest the route is discussed in sections</p> <p>b) Ascertain the cost of your proposals (specifically broken down by section) so that these can be shared with developers if and when negotiations begin on the strategic allocation land, and to help you seek funding for the measures you require outside the scope of development sites. It also means you could build in stages, as sections receive pots of money, to avoid needing to fundraise for everything in one go.</p>	<p>Implementation advice not relevant for the NDP</p> <p>Though helpful advice because this would increase the likelihood that the strategic site will provide developer contributions, the HA would normally cost schemes and not leave it to the Parish Council who are not qualified. In addition, the PC funding is for capital improvements not supporting studies.</p>

	No changes made
Page 4 Para 3 <i>“the main points that are drawn from this evidence is set out in the box below.”</i> Replace ‘is’ with ‘are’	done
<p>Page 4 Main conclusions text box:</p> <p>- first paragraph, Replace <i>“several”</i> with <i>“3 serious and 1 fatal between Little Haresfield and Stonehouse in the last 5 years”</i></p> <p>- 4th paragraph <i>“will create a robust network of accessible cycle and pedestrian routes that will also function as wildlife corridors. It will be necessary for the Standish NDP to carry these routes forward into new development such as that at PS19a/South Standish”</i> Add: <i>“Accessible cycle routes that are high quality, fit for purpose and usable by a variety of non-motorised vehicles including cargo bikes and mobility scooters”</i> Also add reference to Figure 1 here.</p> <p>- Paragraph 4 <i>“The Parish Council objects to any development that has motorised access onto the B4008, which would add to levels of traffic, thus exacerbating the current concerns and issues.”</i> Add: <i>“without mitigation” otherwise improvements to the B4008 are unlikely</i></p>	<p>Change made</p> <p>Change made</p> <p>Change made.</p>
<p>Page 8 Para 18. <i>“Standish Parish Council identified these issues in the Parish Plan of 2009. It reported that local residents saw improving safety on the B4008 as the number one priority issue, and the Parish Council consequently started to investigate the possibility of a multi-user pathway alongside the road. * Standish Parish Council reported that “Young people cannot cycle to school. Residents are frightened to cycle or walk to Stonehouse. Horse riders cannot access bridleways safely.” Such concerns are likely to be shared by other local residents, both in Stonehouse and its outlying villages.”</i> ^[SEP]</p> <p>Add: <i>This would provide access into existing PROW and bridleways, which then link to neighbouring settlements. Surface improvements would provide a traffic free network to help local residents access a range of facilities, including (use some examples here such as the local school, the allotments, Stroud Green etc.) This network would be an opportunity for onward connectivity of a more strategic nature.”</i></p> <p>List some objectives that would be achieved through your ambitions here, what are you aiming for? For example, the LTP objectives are:</p> <ol style="list-style-type: none"> 1) Protect and enhance the natural and built environment 2) Support sustainable economic growth 3) Enable safe and affordable community connectivity 4) Improve community health and wellbeing and promote equality of opportunity 	<p>Local examples to include: Stonehouse GP practices, Maidenhill Comprehensive School, local shops, restaurants and food outlets, the Stagholt allotments, Stonehouse railway station and bus stops. Changes made</p> <p>This is suggesting that the NDP take a different approach to vision and objectives which is not appropriate now because it might be considered a major change triggering need for re-run of Reg. 14 consultation when the current method is sufficient. No changes made.</p>

<p>Page 9 Para 21. Second Bullet point: <i>“many people are frightened to cycle to the shops or to work”</i></p> <p>Is frightened really the word? I doubt many have actually done it, because they perceive it to be too dangerous.</p> <p>Third bullet point: <i>“walking along the road is almost impossible, especially between Stroud Green and Stonehouse”</i></p> <p>Replace “almost” with “essentially” </p> <p>Final Bullet point: <i>“Off-road cyclists, especially young people, who enjoy the challenges of Standish Woods would like a safe access route, especially from Stonehouse”.</i></p> <p>Excellent! Love this point</p>	<p>Replace with “Many people perceive it to be too dangerous to cycle..etc” change made</p> <p>Change made</p>
<p>Page 10 Figure 2 point b: <i>“The construction of a new side of road pavement between Horsemarling Lane and Stroud Green.”</i></p> <p>Do we need a new side of road pavement AND off road multi-user route? Can't we bring these together?</p>	<p>This is a matter for the HA and not the NDP. No change made.</p>

Appendix 4: Proposals relating to land under the control of Robert Hitchins in PS19a

Meeting Title	SP19a Consultation Discussions with Standish Parish Council (SPC), Pegasus and The Robert Hitchins Group
Meeting Date/Time	02 March 2021 / 14:30
Attendees	Phil Hardwick (PH) – Head of Planning – The Robert Hitchins Group Sarah Hamilton-Foyn (SHF) – Senior Practice Director – Pegasus John Armstrong (JA) – Master Planning - Pegasus Peter Amies (PA) – Phoenix design – Drainage/flood risk Andy Miles (AM) – PEA Consulting – Transport planning Andrea Pellegram (AP) – Planning Consultant for SPC Cllr Sue Hartley (SH) – Chair of Standish Parish Council Sue Oppenheimer (SO) – Neighbourhood Development Plan Steering Group Cllr Michael Jenkins (MJ) – Standish Parish Council

Item	Description	Action
1	<p>Introduction</p> <p>AP thank Pegasus/Hitchins for arranging the meeting and for agreeing to hear comments from SPC. She then provided an overview of the current Neighbourhood Development Plan (NDP) progress. It was noted that the SEA is in progress, and the NDP is anticipated to be submitted for Reg 16 in Spring. Reg 14 is complete.</p>	-
2	<p>Site Name</p> <p>AP reiterated the Parish Council’s concerns with the site name of Northwest Stonehouse (as more fully described in the formal response email).</p> <p>PH explained that the name had been taken from the draft Stroud Local Plan and the intention of having a name consistent with this plan is to assist with the planning submission. SH clarified that Stroud would have used the name due to Standish being part of the ‘Stonehouse Cluster’. PH commented that in principle The Robert Hitchins Group had no objection to the name South Standish. However, he also pointed out that the actual name for the location would change post planning permission and the housing developer could change the name themselves to something which does not include Northwest Stonehouse or South Standish.</p> <p>PH suggested that the name for the site in the planning submitting could be amended to include South Standish in brackets. The Robert Hitchins Group and Pegasus will consider this further.</p>	PH/SHF
3	<p>Design in response to NDP design principles</p> <p>AP highlighted various features of the plan which the Parish Council are pleased to see included, such as the green buffer to the North and the loop road which would carry any traffic to the south, and not to the B4008.</p> <p>AP expressed that the standard of footpath should be continuous from the south of the development to the north into the countryside, although from the information presented so far this appears not to be the case. She also commented at the lack of wildlife corridors.</p>	

	<p>In respect of the green buffer, SH enquired as to why there was as section of the North East border which did not appear to have the same buffer. JA advised that there is a strip of land here which would be considered to be a buffer for this section, however, there are still studies coming in which will determine the final buffer to be proposed.</p>	
4	<p>Relationship to other sites to east in PS19a and access to these sites AP queried the allocation of land. Specifically, the following: The land to the east, which still appears to be available for further development. The landlocking of Stagholt Farm and the land to the east and concerns that future development would have to exit the site to the B4008.</p> <p>PH advised that the proposed plan only includes land owned by The Robert Hitchins Group. The land to the east which is also subject to PS19a is owned by Gloucestershire County Council. PH also commented that the Local Plan includes an allocation of 5 hectares for employment and Hitchins would now anticipate that the GCC land would absorb this allocation.</p> <p>SO and SH raised how visually intrusive it would be for the east section of land to be used for employment given it's visibility from the AONB.</p> <p>AP suggested that the lack of access to the site left by the proposed Pegasus/Hitchins plans would leave this site redundant. SHF advised that the Stroud Local Plan indicated that there would be access to the east of the site from the South, just below Stagholt Farm (from the purple area as shown on the The Robert Hitchins Group/Pegasus proposal for the site). AP expressed concerns around the water course and nature in this area, which would need to then be crossed by commercial traffic.</p> <p>AP requested that, whilst it is understood that The Robert Hitchins Group are not responsible for the east of PS19a, that Stagholt Farm be considered to have an access point via their site. PH agreed that he would take this point away and consider.</p> <p>AP/SH discussed referring to both SDC and GCC. Subsequent to the meeting it was agreed that SH would email contacts at both to bring the proposals to their attention along with our concerns.</p>	<p>PH/SHF</p> <p>SH (Completed)</p>
5	<p>Quantum of development AP queried the number of houses proposed at 700 for just this portion of PS19a, which exceeds the 650 originally allocated for the whole of the PS19a site. SHF described the proposed 700 homes as Pegasus assessment of the 'best use' for the site. She commented that the numbers in the Stroud Local Plan are a 'minimum'. PH described the 650 as a 'crude assessment', and that their more detailed assessment is more appropriate.</p> <p>AP queried the density of housing proposed. This was noted to be 38-40% which AP felt to be particularly dense. It was further explained that this</p>	

	<p>density figure excluded green areas as this is how house builders calculate density (as opposed to planners). It was also noted that houses would have back gardens.</p> <p>SO commented that a more visual representation of the housing proposed for the site would be helpful. PH advised that a more illustrative design would be required at the next stage, following this initial consultation. He explained that The Robert Hitchins Group like to open discussions early, rather than put in an almost finished design which reduces the effectiveness of local consultation.</p>	
6	<p>Sustainable Transport Policies</p> <p>AM advised that the consultation would include SDC and Highways. He also advised that the Transport assessment is yet to be submitted.</p> <p>SO described how there is great potential for non-motorised access to Stonehouse, including the proposed Multi-user path. If non-motorised routes from the site are established to the east (near the allotments etc) then journeys could be cut to just a mile or so by walking, rather than a much longer 3 mile or more drive. AM was supportive of walking/cycling proposals.</p> <p>AP drew attention to the Standish NDP Transport Plan and emphasised that it should be consulted/considered as part of the development. The suitability of routes was discussed and it was noted that there should be a balance between ‘paving over’ and leaving them natural, but for them to remain appropriate for plenty of foot and cycle traffic.</p> <p>AP also advised that anyone should be able to walk through/access these routes, not just residents of the specific development, as routes should provide links through to the countryside.</p> <p>Standish Multi-user path proposal: AP and SO explained the project the Parish Council are working on to improve connectivity for non-motorised transport between Standish and Stonehouse. AP requested consideration of this project in developer contributions. PH and AM appeared to acknowledge this request.</p>	
7	<p>Flood attenuation</p> <p>PA explained that two attenuation ponds have initially been planned based on the assessment of run-off from the site. Items such as permeable paving are being considered. Further assessments are due to take place which may affect the number of attenuation ponds. PA commented that these features would be made accessible to the public.</p> <p>AP requested that sustainable flood management techniques be considered as detailed in the Standish NDP Environmental policies. PA agreed to review the policies.</p> <p>SO raised concerns that the attenuation pond at the recently completed Standish Gate development had flooded already so there are concerns around flooding onto the B4008. SO then asked whether an attenuation</p>	

	pond to the north had been considered to prevent run off to the B4008. PA advised that this would be reviewed with the later detailed assessment.	
8	<p>Consultation with Standish Parish</p> <p>AP requested that, as specified in the Standish NDP, that developers please keep dialogue open with the Parish Council.</p> <p>SH expressed concern that only 2 houses in the Parish were consulted, in addition to those in Great Oldbury.</p> <p>SHF explained that 367 notifications had been sent by post. Only residents in the area to the west of the railway line were consulted. SH explained that the majority of residents in the parish are to the east of the railway and had not been consulted, despite the development being entirely in their Parish. SHF agreed that they would send future notifications to a wider area to include other Standish residents.</p> <p>PH enquired as to the next stage of the Standish NDP and the likely date it would be adopted. AP explained that screening is currently in progress but that COVID appeared to be preventing the SEA site visit. A desktop exercise may need to be completed instead. Reg 16 consultation will follow asap, with Examination anticipated to be in July. Following the referendum, the NDP becomes material.</p> <p>PH explained that in terms of the development timeline, their planning submission would likely run in parallel with the Stroud Local Plan. Permission could be granted before the Local Plan has been formally adopted but it would be a 'political decision' to do so.</p> <p>It was noted that the Standish NDP would likely be adopted at a similar time, or possibly sooner.</p>	
	Notes completed by: Michael Jenkins 06/03/2021	

Initial response from Standish Parish Council to Pegasus Planning regarding proposals at “Stonehouse North”

Date of meeting: 2 March 2021

Standish Parish Council has apprised itself of the outline proposals for Stonehouse North (referred to as PS19a in the emerging Stroud District Local Plan).

Standish Parish Council is preparing a Neighbourhood Development Plan (the NDP) which went through Regulation 14 Consultation in Summer 2020. Pegasus Planning, the planning consultant supporting this scheme, has submitted a response which has been taken into account in revisions of the NDP. The extent of these revisions will not be repeated here but can be made available upon request.

The NDP is allocating a site at Stagholt Farm which, as such, requires to be considered in a Strategic Environmental Assessment. It has also been screened for Habitats Regulations Assessment. Whilst the HRA has been completed and minor changes to the text of the NDP will be made as a result, the SEA remains to be completed. Scoping with Statutory Consultees is underway but due to Covid 19 restrictions, the site visit has not yet been possible. However, despite these difficulties, the Parish Council hopes to submit the NDP under Regulation 15 to Stroud District Council between late March or May 2021. The NDP was prepared to meet the challenges of the emerging Local Plan and anticipates the proposal at Stonehouse North. Therefore, many of the policies in the emerging NDP are relevant.

The Parish Council thanks the applicants and Pegasus Planning for the opportunity to comment upon the scheme while it is still in its preparatory stages so that the NDP policies can be used productively to inform the scheme’s design.

This response will rely upon the policies as they have been updated following the Regulation 14 consultation, and as they are now being assessed in the SEA. These comments will therefore rely upon policies that have changed since the published Regulation 14 draft. To assist Pegasus and the applicant, the policies are cut and pasted as an appendix to this response. However, the NDP has yet to progress through its Regulation 16 consultation and has not yet passed its Examination, so there may be further changes. Please bear in mind that, whilst the NDP policies are not yet material to planning, they represent significant work by the Standish community and are based on rigorous and robust assessments.

The Stonehouse North masterplan has much to commend it and, overall, the Parish Council can support what it seeks to achieve. Its positive attributes will be set out below. Where the Parish Council has concerns, these will be raised below as the starting point for discussions at our meeting on 2 March 2021.

Policy S2: Major Development in South Standish

The NDP refers to Stonehouse North as “South Standish”. This choice of name was very important to the local community because the proposed development lies entirely within the Standish Parish boundaries and, though Standish is a dispersed rural community, many of the residents have a deep connection to the place. Therefore, they are troubled when land which is part of their parish is named for Stonehouse, which is a neighbouring settlement. Though this is only a matter of name, it is highly symbolic to the people of Standish and the applicant is asked to consider whether the name of the development could somehow reflect this.

The NDP policy S2 specifically sets out design parameters for the proposed development which refer to “South Standish Development Principles”. The policy requires that a masterplan be produced (which it has and which is the basis of this consultation) that takes account of the Development Principles. It is not clear how much the principles have influenced the design, and this is something that we can discuss in our meeting. However, it states clearly in the policy, and Pegasus is well aware of this and indeed argued the contrary in its Regulation 14 response, that the masterplan “will be produced in consultation with the Parish Council and the community”. Technically, it could be argued that the current consultation to which the Parish Council is responding meets this test. However, it appears that the postal consultation has only gone to two households with Standish Parish. Additionally, the Parish Council and community have not been involved in any preparation and it is hoped that moving forward, this will be rectified, and a more productive working relationship can be fostered.

The policy requires that a Consultation Statement will be required explaining how the community was involved in the design. Technically, it may be the case that the application is submitted before the NDP is made (and therefore material) but consultation is best practice and strongly encouraged by the NPPF, and it is hoped that, even if the policy is not material, it will be respected. The policy will certainly be material when reserved matters applications are submitted but by then, many of the most important design decisions will have been made. We are sure that Pegasus and the applicant wish to realise the best possible development and that they will respect the local community who will be living with and in the development in the future.

The Development Principles seek to encourage the development to be well integrated in the rural setting and this appears to be the case. The northern open space area is welcomed and will be a clear urban fringe buffer to the countryside.

The Development Principles require that the site layout allows existing residents (scattered across Standish Parish and located in several small hamlets) to have equal access to the facilities in the new development. This should be delivered through improved cycle and footpaths to the countryside using existing PROWs. Though it appears that the PROW network will be accessible from the northern open space, it is not clear how this relates to the PROW network and wider sustainable transport links to other settlements. This is something that can be explored in our meeting.

It appears from the masterplan that PROWs crossing the site will have nominal green surroundings. The NDP approach is to create effective integrated wildlife corridors linking the PROWs to the countryside and providing additional habitats. It might be beneficial for all the PROW to have a wider corridor, using the standards from the Stonehouse NDP (which is part of Standish NDP policy). This is a relatively minor change to the masterplan but will have benefits for sustainable transport and biodiversity.

The site does not add traffic to the B4008 and this is very strongly supported by the Parish Council. Traffic on the B4008 is a significant concern. The use of a circular main road in/out of the site is welcomed. However, there is concern that the other sites subject of PS19a will not have access and will be effectively “land locked” which may divert traffic to the B4008. The Parish Council would strongly oppose this. Therefore, the other sites (Stagholt Farm allocation in the NDP and the remainder of the PS19a) should have the capability of sharing access through this development and into Stonehouse without using the B4008. We appreciate that this may cause difficulties because the other landowners will be benefitting from this scheme, but something will need to be agreed with the assistance of the Planning Authority.

We see that allotments are included and this is strongly supported and aligned to the Development Principles. Native species are specified but this will be addressed at reserved matters stage. In addition, other aspects of the Design Principles such as landscaping, minimising carbon impacts, building orientation, broadband will probably need to be dealt with in reserved matters.

Policy S2 requires a community infrastructure access study which will assess the need for infrastructure and how it will be delivered. The website says that supporting documents will be prepared but does not say which. We expect that this matter will be covered in those studies.

Policy S2 requires that a Countryside and Wildlife Plan should be prepared which will describe how PROW will be enhanced, and we expect that this matter will be covered in the final supporting documents.

We assume that a Transport Assessment will be produced as required in policy S2D, and we have already stated that we support the avoidance of traffic to the B4008.

Policy S2E requires a Sustainability Statement regarding carbon reduction and flooding, plus other measures to combat climate change. We see that there is a flood attenuation pond of some sort in the south eastern part of the development and we would be interested to see how the final flood management documents promote natural flood management techniques in line with Government’s latest thinking.

We have some concerns about the boundary landscaping of the scheme which is made more complex by the land to the east which is proposed to be allocated in PS19a. The Landscape Evidence supporting the NDP indicates that this site is visually prominent in views from the AONB and that tree screening will be required. In effect, the land to the east of this proposal will have a greater impact on those views, but because the AONB is at a much higher elevation and the views are down over both sites, tree screening will be required on this site as well. We are pleased to see that a green buffer is included on the eastern boundary, but we request that this is made wider and planted according to the advice in our landscape assessment which was prepared by Illman Young.

We have included a policy on sewerage in S2I at the request of the water authority and we will not comment more upon this other than to state that it is expected in the supporting evidence.

Other measures in S2 are probably better addressed at the reserved matters stages:

F: Energy Strategy

G: Lighting Strategy

K: soil management in landscaping schemes

Policy S3: Sustainable Transport

The main objective of this policy is to improve sustainable transport provision in Standish by improving PROW linkages and enhancing agreed priority routes. The detailed justification is set out in a supporting evidence paper which Pegasus has seen when it commented upon the Regulation 14 draft NDP.

Overall, though the PROW are noted in the masterplan to exist, there is very little evidence that they will be improved in any way or that the enhancements will be provided. Some of the PROW are indicated to simply map over developed areas with no supporting wildlife corridors. Overall, more thought needs to be given to this matter, but we can discuss this when we meet.

In addition, the development is surrounded by PROW. It appears that these are considered to be “external” to the development. We do not agree with this approach – we see that the adjoining PROW will be used by the future residents of the scheme and that it is wholly within the requirements of NPPF 56 that these be included in the scheme. Again, we can discuss this with you.

Finally, the residents of the new homes will certainly be accessing the local beautiful countryside. The NDP identifies specific PROW improvements where developer contributions will be sought to improve these routes. We hope that this will be discussed in the planning application when it is prepared.

We would like additional clarification on how the proposal will address the options for off-road multi-user route/accessible cycle routes required in the SNDP.

Other matters

On a more general matter, we have two additional concerns not relating specifically to the SNDP policies:

The proposal is for 700 homes. However, the local plan review only requires 650 homes on this site. Why is there an additional 50 homes in excess of the required housing need?

If all the homes were to be located on this site, what is the status of the land in PS19a to the east? Will this result in more homes? If so, this would be significant over provision and contrary to the emerging local plan policy.

Thank you for agreeing to meet with us to discuss this. We feel that the development is positive overall but requires some adjustment which should be easily accommodated at this early stage of the scheme’s design.

We are interested to learn when the application will be submitted. Under current adopted policy, this land is countryside and the scheme should be refused in principle. The site allocation will rely upon the adoption of the Stroud Local Plan. The Local Development Scheme updated in 2020 anticipates that the Development Plan will be adopted in Autumn 2022.

Thank you very much for the opportunity to give our comments upon the evolving masterplan and we look forward to discussing these matters with you on 2nd March.

Appendix 1: Revised Standish NDP policies which have taken account of comments received in the Regulation 14 Consultation.

S1: Standish Development Framework

Development in Standish Parish will be appropriate to its location in the Standish Development Framework, defined in **Table 1** and **Figure 8**.

Development in the AONB (Area A) and within the AONB's setting (Area B) will normally be inappropriate, except as allowed under Local Plan policy ES7.

Development in Area C would generally be inappropriate in this countryside location however, should development be proposed, a Landscape Assessment will be required that demonstrates that harm has been avoided to the setting of the AONB and the setting of the Standish Church, Village Hall and Court and other historic assets (Area F). Planning permission will not be granted unless potential harm can be mitigated to an acceptable level. In addition, development should not significantly increase traffic on local lanes or the B4008.

Development in Areas D and F will only be allowed where it preserves, protects and enhances the listed buildings and their landscape setting.

Areas E are not sustainable locations for development except under limited circumstances since they fail to fall within the Stroud District Settlement Hierarchy.

Area G will be subject to NDP policy S2/Great Oldbury and will be referred to as South Standish.

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

Proposals on land subject to flooding, particularly residential development in Flood Zone 3, will not be supported.

South Standish Development Principles
A masterplan will be prepared in consultation with the Standish Parish Council and meaningful pre-application engagement will take place that will allow the Standish Community to have their views reflected in the overall site layout , design and access;
The new development should seek to retain the rural character of the parish 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.

The new development will pay regard to the existing community and will allow equal access to all parishioners, whether this be transport access or social/community access. The masterplan will need to demonstrate that there are effective transport links between new community infrastructure and the existing community, and that all members of the Standish community will be able to participate equally.

The masterplan will need to demonstrate how effective multi-user sustainable transport links with integral wildlife corridors will link between Strategic Site SA2 and Stonehouse through the development to the remainder of Standish and towards Gloucester, connecting with proposals for a strategic cycleway linking Stroud and Gloucester and how these links will encourage access to the countryside for health, recreation and sustainable transport.

Access to the site will avoid greater use of the B4008 for motorised vehicles.

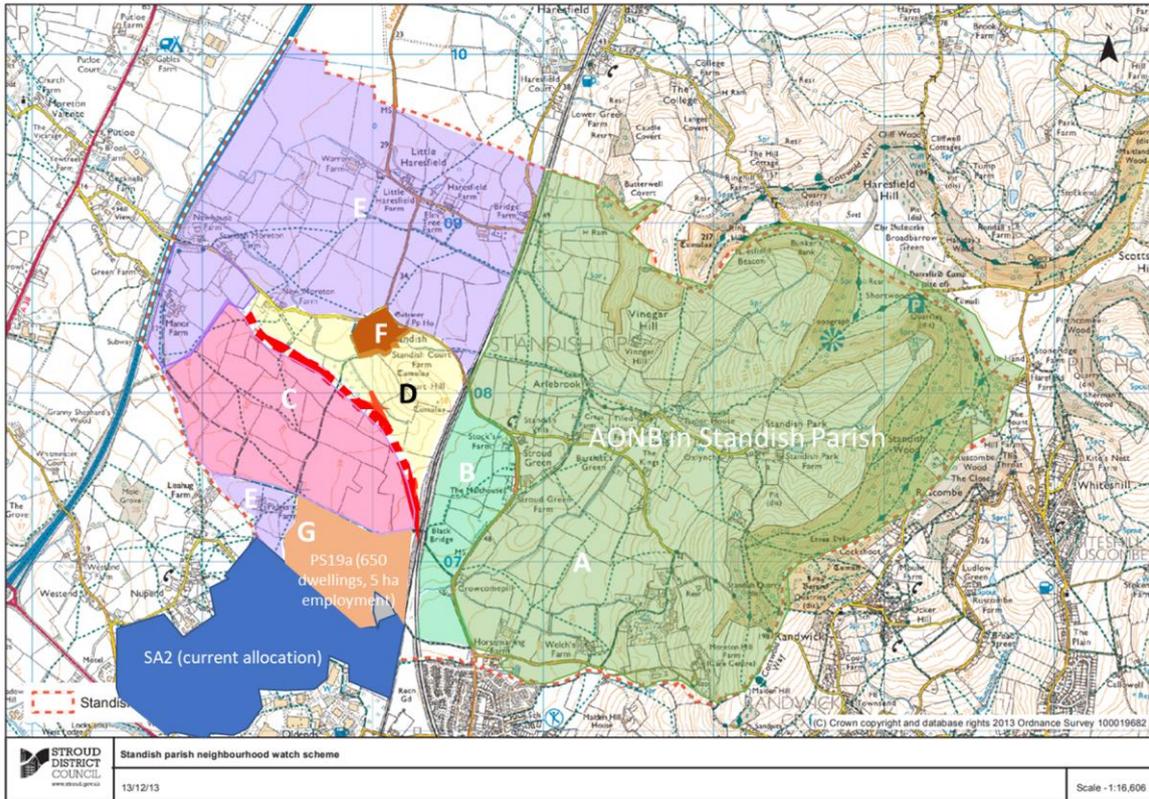
Green infrastructure will be provided in the form of allotments, parks and recreation grounds, children's play areas, youth access and Accessible Natural Greenspaces to meet identified under-provision. Any new planting will be in sympathy with existing, with a prioritisation of native species to enhance opportunities for wildlife, and will be planted at the appropriate time of year, with care for soils and be well-maintained, particularly to ensure survival in the early stages. Planting and landscaping schemes will be maintained to a high standard for at least a period of 10 years upon completion of the scheme.

Developers will be asked to work with the Parish Council in the design phase to identify means of minimising the carbon impacts.

New development will be designed, landscaped and oriented in such a manner to avoid all unnecessary light pollution into the countryside. The use of street lights at the edges of the development facing the countryside will be strongly resisted.

New development will be on mains sewers and have faster broadband.

Figure 8: Standish Parish Character Areas



S2: Major Development in South Standish

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

A Consultation Statement explaining how the Standish Community was included in the design, and consulted on access and layout of the scheme.

Community infrastructure should be provided as indicated in a Community Infrastructure Access Study. The Study will explain how community infrastructure needs will be met and how all members of the Standish Community will have equal transport and social access to new community infrastructure. This should contain an assessment of the following issues as a minimum: access by car and sustainable transport, access by age and level of mobility, barriers to access such as private membership and financial considerations. Community

infrastructure includes: health facilities, school places, sport and recreation facilities, meeting halls and spaces.

A Countryside And Wildlife Plan demonstrating how existing public rights of way will be enhanced to provide access to and from the countryside in line with policies S1 Countryside Development Framework and S3 Sustainable Transport and linking to land in policy S4. The Plan will seek to introduce wildlife corridors alongside and within sustainable transport access corridors as recommended in the Standish Landscape Assessment, will preserve existing trees and hedgerows, provide wildlife corridors linking Stonehouse to the Standish countryside in a manner that ensures that the same standard of provision is provided along the entire length of the routes, and will use existing water features as a means of improving flood resilience and wildlife habitats. A range of habitats will be provided for species diversity with a range of surface water flow types and meanders in channels being preferable. Green infrastructure will be provided to meet identified under-provision.

The Transport Statement or Transport Assessment must identify means by which traffic will be prevented or discouraged from using the B4008 and means by which more sustainable transport options will be encouraged in line with the Local Transport Plan. It must identify safe commuter and leisure pedestrian, cycling and multi-user routes to Stonehouse and towards Gloucester, in line with the Local Transport Plan's aspirations for a strategic cycleway.

A Sustainability Statement demonstrating how potential for carbon reduction has been maximised, exceeding current Building Regulations Standards where possible and showing that new developments will be on mains sewers and have faster broadband in consultation with the statutory providers including the Flood Authority. The statement should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator and should not exceed 110 litres/person/day. Developments should demonstrate that they are water-efficient, where possible incorporating innovative water efficiency and water re-use measures.

An Energy Strategy will accompany the Sustainability Statement and demonstrate that design of development has:

- Minimised the demand for heating/cooling, hot water, lighting and power through energy efficiency measures;

- Minimised excessive solar gain through orientation, built form, massing, fixed, mobile and seasonal shading and green infrastructure;

- Maximised passive cooling through natural ventilation, diurnal cooling;

- Met residual cooling load renewably, and considered opportunities for seasonal cooling/heating.

- Maximised on-site renewable energy generation; and ensured that, as a minimum, the developments would secure most of its total regulated energy from decentralised and renewable or low carbon sources.

At such a point that a carbon offsetting regime for Standish Neighbourhood Area is in place; after applying on site measures, all development would achieve a 100% reduction in its remaining regulated and unregulated emissions through the use of carbon offsetting.

Provided rainwater harvesting for all properties to allow for a more sustainable use of rainwater.

A Lighting Strategy will set out means of preventing light pollution arising from the development causing harm to the tranquillity and night-time darkness of the open countryside.

A Landscape Visual Impact Assessment will be undertaken to ensure that harmful impact upon views to and from the AONB are minimised. The LVIA will use the Standish Landscape Assessment as its starting point and should explore the opportunities identified therein.

A Sewerage and Drainage Masterplan will be provided which demonstrates consideration of the timing and phasing for necessary infrastructure provision at an early stage within the planning process to enable strategic infrastructure to be designed appropriately. All applications for new development will demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such a way that discharges to the public sewerage systems are avoided, wherever possible.

A Landscape and Habitat Management Plan (LHMP) in order to safeguard ongoing management of the landscape and associated habitat for a minimum of the next ten years. The LHMP must deliver:

- Conservation of any special landscape features of the site such as individual trees, hedgerows, native grassland, wetland, ditches, water bodies and any other notable features.

- Safeguard the provision and long-term use of low key open space, public footpaths, bridleways and cycleways, that take advantage of any natural assets in the site.

- Management of the landscape and habitats to conserve and enhance biodiversity.

The LHMP will set out the contribution that habitat management will make in relation to each of the above overarching objectives as follows:

- Description of the site context and valuable ecological resources within and close to the site that will be managed under the LHMP;

- Description of and principal objectives of management to be undertaken;

- Review of any current management and evaluation in relation to local, regional and national Biodiversity Action plans (BAP);

- Set objectives for the next ten years for habitat management;

- Description of constraints that may influence management prescriptions;

- Provision of habitat management tables which set out management tasks for the next ten years;

- Set out a programme of habitat and species monitoring to inform future management;

Review of all current and future guidance from DEFRA and any opportunities to apply for future grant funding under the Countryside Stewardship and Woodland Grant Scheme.

In order to give all proposed new planting (trees, shrubs, hedges, ornamental planting, meadow / amenity grass) the best possible chance of establishment and long-term sustained growth and vigour, any existing topsoil and subsoil must be carefully protected and / or stripped and stored in accordance with the following guidance:

DEFRA – Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009);
British Standard for Topsoil BS3882;
British Standard for Subsoil BS8601.

S3: Sustainable Transport

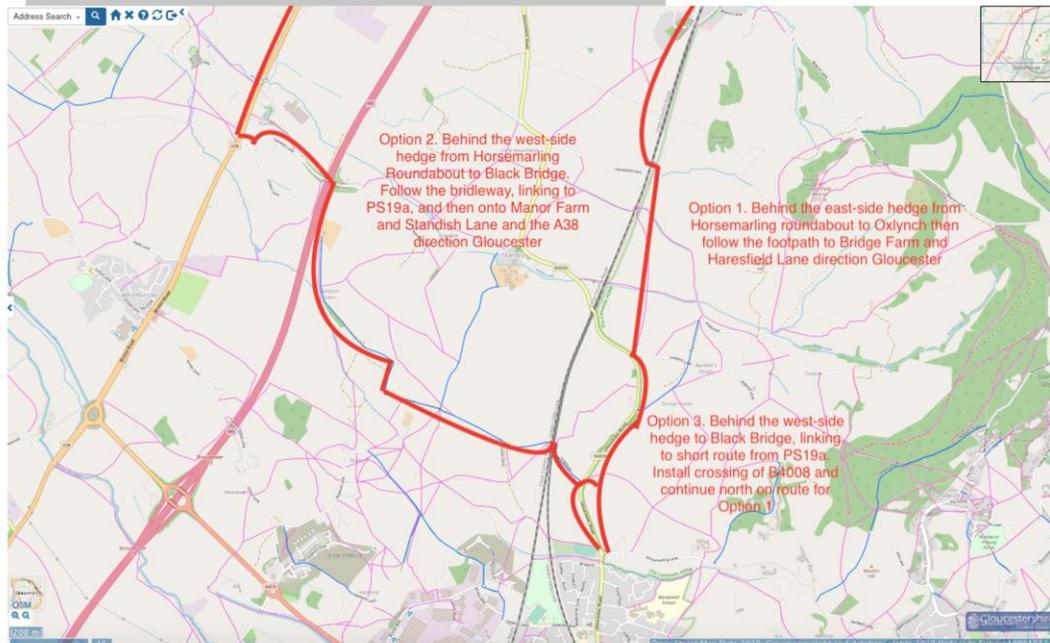
Strategic Development will provide safe and pleasant multi-user sustainable transport routes by enhancing the Public Rights of Way Network and Strategic Cycleway Network. Enhancements should provide an attractive and safe replacement for the private car, commuter routes and improve local leisure activities. Provision will maintain the standards of improved routes that connect to those listed below, will conform to the standards in the Gloucestershire Rights of Way and Countryside Access Improvement Plan, and will provide effective wildlife corridors which link to the adjacent countryside.

Development will be supported where a reasonable contribution is provided towards the delivery of identified improvements of the PROW network adding to the PROW usership. Improvements are identified in the **Sustainable Transport Evidence Paper**.

Standards from “*Creating Better Streets Guidance: Inclusive and accessible places*” and “*Local Transport Note 20*” should be used as the starting point for design and enhancement of sustainable transport routes.

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

Figure 11: Other possible options for off-road multi-user route/accessible cycle routes



Any development of land which would result in a material increase or significant change in the character of traffic using a railway crossing should be refused unless, in consultation with Network Rail, it can be demonstrated either that safety will not be compromised or, where safety is compromised, that serious mitigation measures would be incorporated to prevent any increased safety risk as a result of any permission.

South Standish Strategic Allocation:

All PROWs that link to those in adjacent Stonehouse will adopt the same standards so that movement between parishes is at the same standard for the length of the journey through either parish. This applies to the following footpaths:

- Eastington Footpath 7
- Standish Footpath 6
- Standish Footpath 6A
- Standish Footpath 21
- Standish Footpath 30
- Standish Footpath 31
- Standish Footpath 32
- Standish Footpath 58
- Standish Bridleway 16
- Standish Bridleway 22

Strategic Site PS19a - draft site allocation Northwest of Stonehouse (Standish)



[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Thu 04/03/2021 13:32

Thank you for our conversation the other day about the proposed multi-user path. I will be in contact with you again about this in the near future. This correspondence relates to the strategic site PS19a, allocated in the draft Stroud Local Plan. As you know, this site is located in Standish and owned, in part, by the County Council. If you are not the right person to write to about this, I hope you will be able to redirect this email appropriately.

You may be aware that Pegasus are currently undertaking a community consultation on the section of PS19a which they call Stonehouse North.

On 2nd March, Standish Parish Council representatives, together with our planning consultant, had a meeting with Pegasus and Hitchins about their draft Development Framework for this site, in relation to the policies contained in our emerging NDP. Whilst in many respects a very positive meeting, the Parish Council has some immediate concerns, which I have been asked to draw to your attention and seek your comments.

Firstly, the Pegasus/Hitchins' Development Framework is for housing only. This suggests that all the employment land will be situated on the eastern section of PS19a, owned by Gloucestershire County Council. As this is the part of the site which is most sensitive in terms of views from the AONB, it causes us some concern. Is this something that you are aware of and are you able to say what the County Council's view is about it?

Secondly, it appears currently that the eastern part of the site will be land-locked. Pegasus/Hitchins' Development Framework shows the primary highway link within their site. Clearly, there will be estate roads coming off this link. However, Hitchins were clear in conversation with us that they would not want the type of heavy/goods vehicles relevant to employment land to be moving through their part of the site. They do not envisage extending their roads to enable access to the eastern part of PS19a. So, I would like to ask if the County Council is aware of this issue and, if so, how it is likely to be addressed. The Parish Council and Standish residents are extremely concerned about the possibility of additional traffic exiting onto the already-busy B4008 and we very much hope that is not being envisaged as a possible solution.

I hope that we are being helpful in drawing these points to your attention and look forward to receiving your comments.

Kind regards



PS19a: Development Framework for Stonehouse North



[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Thu 04/03/2021 13:15

I hope you are keeping well in these ongoing difficult circumstances.

You will be aware that Pegasus are currently undertaking a community consultation on the section of PS19a which they call Stonehouse North.

On 2nd March, Standish Parish Council representatives, together with our planning consultant Andrea Pellegram, had a meeting with Pegasus and Hitchins about their draft Development Framework for this site, in relation to the policies contained in our emerging NDP. Whilst in many respects a very positive meeting, the Parish Council has some immediate concerns, which I have been asked to draw to your attention and seek your comments.

Firstly, the Pegasus/Hitchins' Development Framework is for housing only. This suggests that all the employment land will be situated on the eastern section of PS19a, owned by Gloucestershire County Council. As this is the part of the site which is most sensitive in terms of views from the AONB, it causes us some concern. Is this a decision that has been the subject of strategic planning involving District Council planners and what is your view about it?

Secondly, it appears currently that the eastern part of the site will be land-locked. Pegasus/Hitchins' Development Framework shows the primary highway link within their site. Clearly, there will be estate roads coming off this link. However, Hitchins were clear in conversation with us that they would not want the type of heavy/goods vehicles relevant to employment land to be moving through their part of the site. They do not envisage extending their roads to enable access to the eastern part of PS19a. So, I would like to ask if District Council planners are aware of this issue and, if so, how it is likely to be addressed. As you know, the Parish Council and Standish residents are extremely concerned about the possibility of additional traffic exiting onto the already-busy B4008. We have understood, and appreciated, that District Council planners share this concern. The map of PS19a in the draft Local Plan has an indicative arrow coming into the eastern part of the site from Great Oldbury, but we cannot envisage where an access road would actually be located.

Thirdly, we wonder if you have any comments on the fact that the Pegasus/Hitchins' plans are for 700 houses on this section of PS19a. Presumably, there could be an application for more houses on the County Council-owned part of the site, in addition to employment land?

I hope that we are being helpful in drawing our first two points to your attention and look forward to receiving your comments.

Kind regards



Appendix 5: Email correspondence relating to SEA and HRA

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FW: Request for Screening Opinion on Standish NDP



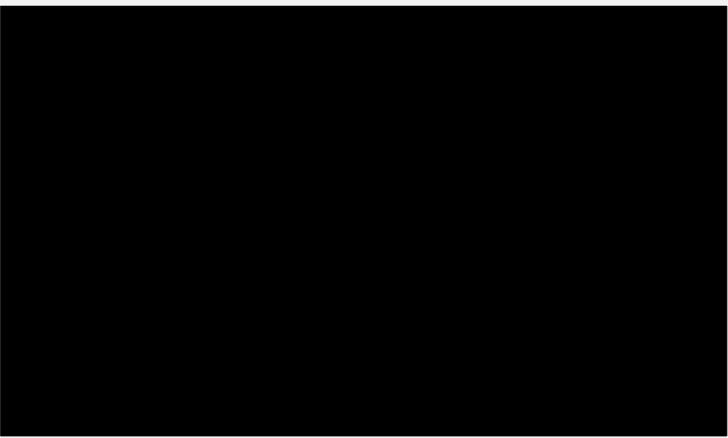
Reply Reply All Forward ...

Wed 22/07/2020 17:50

I was dismayed to learn that the planning authority has not actioned my request for a screening opinion from 19 May. In this recent response, the LPA admits that SEA will be required. Is this sufficient for you to get the process started so that AECOM can be appointed for this work?

It may be that the Opinion is received at about the same time as AECOM is ready to proceed. If that were the case, we would not have lost much time.

Your advice and assistance will be very much appreciated.

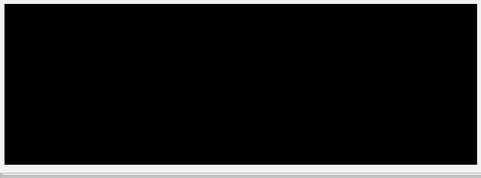


As I understand it, we cannot commission AECOM or agree that Locality funds the SEA until we have a screening opinion which sets out the issues that the SEA will consider. I asked for a screening opinion so that we could start this process.

Am I correct in understanding that you have not actioned my request for SEA screening? If this is the case, I am asking again that a screening opinion is prepared immediately. The SEA process may take up to 4 months to complete from the time the Opinion is received. This will result in delay in the NDP process which is regrettable.

I will ask if Locality will accept this email as proof that SEA will be required.





As I understood it, we had agreed previously that the NDP would need an SEA and you would go ahead and appoint Aecom accordingly. Apologies for any confusion, but please do go ahead and commence the SEA. An SEA screening opinion will be forthcoming. Alternatively, we can confirm our agreement that an SEA will be required which will bypass the screening process, as I'm sure John can confirm. I have to admit I didn't realise this was an option until checking the Locality SEA screening guidance document (figure 2).
If you want to do this then an email to myself from Standish PC confirming you will be carrying out an SEA would allow me to formalise the determination with a written response to the email.
Given we have never had a site allocated in an NDP, and the proposed Standish allocation is conditional on the Local Plan with no other submitted sites, I feel our SEA screening timings were appropriate, and it is well in advance of the reg 16 pre-submission, but happy to receive updated guidance from John on this.
In the mean time I am happy to contact Aecom direct to confirm the SEA requirement if it helps.

All the best



It has now been 2 months since I asked for SEA screening (19 May). We really need to get moving on this so that we can appoint AECOM.

We have been criticised by Locality for not starting the SEA process earlier. I did ask you about this in one of our meetings but you said that it is you standard practice to only provide screening opinions at Reg. 14 stage. John Wilkinson has advised us that this is no longer appropriate and that it is necessary where SEA is required that the process is undertaken as part of the options considerations in the evolution of the NDP policies.

In this particular instance, I'm not overly concerned because there was only ever one possible site and the allocation was designed to remedy an anomaly (that the allocation had an "island" of unallocated land). However, it is not best practice to undertake SEA at this late stage.

Can you please ensure that the screening opinion is provided ASAP. I'm about to go on holiday and I would not be happy if the request I made in May was only actionable in September.

Best wishes





That all is clear and if you are not worried, then I am satisfied that the two processes will be complementary. I'm pleased to hear that the EIA will consider the emerging NDP policies and evidence.

AECOM say that they would like a long lead in time for SEA. Would it be possible for you to give me a provisional response saying that SEA will be necessary? That will then give them some time to get signed off with Locality and get us into the system. We can send the final Screening Opinion when it is ready.

Provided that the SEA timing is not a problem, here is a provisional timetable:

- June – start Reg. 14
- July finish Reg. 14
- September – AP complete review of responses, prepare Consultation Statement and Basic Conditions
- October – agree with Steering Group
- October/November – submit to LPA under Reg 15

I'm also glad to hear that you will start to appoint the Examiner early in the Reg 16 stage. This will be helpful.

Can you please give me an updated timetable for the Local Plan review?



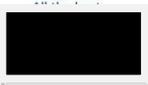
I've been liaising with John Chaplin and can hopefully allay any worries.

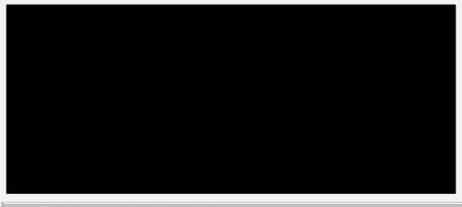
Firstly its worth saying that the NDP screening process is a set process that we have adopted with the help of an environmental consultancy and with approval from an examiner. It will certainly take into account the proposed site and any impending application. I believe John has assured you that the EIA screening will also take into account the NDP and the supporting evidence. I think that will be the limit the screening processes will go hand in hand. I'm not sure if John has given you an opinion on the outcome of the EIA screening, but as you know the screening conclusion for the NDP will require an SEA. I think what is more important is that the SEA report and EIA reports are complimentary, and although that is out of our hands, you would expect the consultants to pick up on this. Also worth noting is that we are required to get agreement with our screening opinion from the main statutory consultees (EA, NE, HE), and they can take a few weeks. I very much doubt they will disagree with our opinion, so it's possible you can commence the SEA before we issue the final determination.

With regards to an application coming forward on the site, I believe the developers are simply front running the Local Plan review process, and wont expect any decision before the new plan is adopted. As it stands the site is not policy compliant and so would be refused. If the Local Plan review process manages to stick to the current timetable then a decision on the site would therefore not be forthcoming until the new year. As the current situation is likely to delay the review process (although this is speculation and not confirmed) a decision is likely to take longer. This should give plenty of time to get the Standish NDP through.

I will always get an examiner lined up at the very beginning of the reg 16 consultation stage so that they are ready to go immediately. What is more important is aligning with the Environment Committee dates, as this is when the NDP will carry weight. Committees have now started up again, so once I have a copy of the timetable we can coordinate the NDP process with it.

Do you have a rough date of when you think a final submission will be ready? I can then work out a timetable to work to which is aligned with future committee dates?





Thanks for that confirmation.

In my mind the EIA and SEA screening should go hand in hand. That's why I suggested a meeting online next week to discuss. It would probably save you some work because I expect that the answer will be the same for both the application and the NDP.

I confess that I am worried that an application is already being prepared and we have not started Reg. 14 yet. I'm worried that our NDP policies will not bear weight in a decision on an outline application because we will be too far behind the curve.

- Could you please make a gentle inquiry of your DM colleagues when they expect an outline application?
- Can you also give me an estimate of the time it will take from Submission to Examination of the NDP based on your past experience?
- Do you think that there is any capacity in the LPA to expedite the NDP process, for instance by appointing an examiner early so that they are ready and waiting when the Reg. 16 consult has finished?

I would hate to think that the NDP, which has required a lot of work from the community, will not be taken into account when the decision on an application is formulated.

Best wishes



I will start the screening process as soon as possible. I'm confident it will require an SEA. I'm also liaising with planning colleagues regarding Land West of Stagholt Farm.

All the best





I will start the screening process as soon as possible. I'm confident it will require an SEA. I'm also liaising with planning colleagues regarding Land West of Stagholt Farm.

All the best

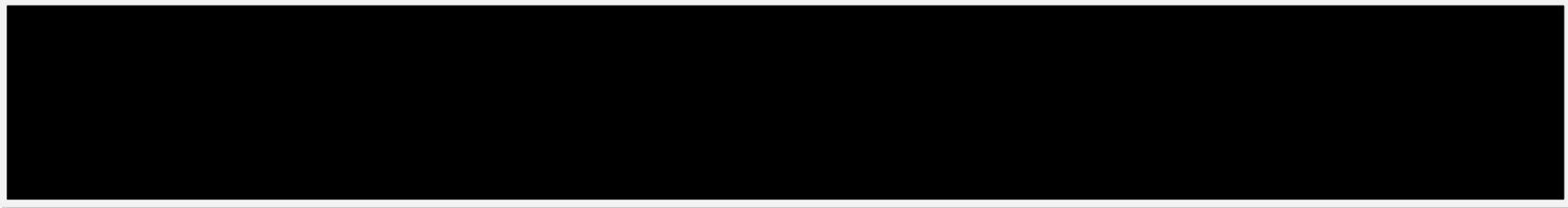


I understand that the NDP will be going out to Reg. 14 in the next few days. Since the NDP will have a site allocation, I expect that SEA will be required.

Therefore, this is a formal request for the LPA to provide a Screening Opinion on the NDP. It would be appreciated to have this as quickly as possible because we will be asking Locality to appoint AECOM for this. I spoke to somebody at AECOM the other day and it appears that they will not be able to turn the SEA around immediately so I would like to get the paperwork submitted as soon as possible.



Appendix 6: Correspondence with County Council regarding multi-user route



Thank you for the opportunity to view your multi user trail proposals on site. Dave Land and myself have given some consideration to your ideas and would like to make the following observations and suggestions:

1. There are two distinct proposals;
 - I) local connectivity into a current development and local connectivity into a strategic allocation site, and;
 - II) a strategic corridor linking Stroud and Gloucester.
 - o We think your focus should remain upon local objectives
 - o The strategic corridor is already in the ambition of the Local Transport Plan. However, your endeavours may result in a 'stepping stone' as it were, to allow GCC to extend the possible multi user facility (travelling north towards Standish from Stonehouse via the strategic allocation site), onwards to Gloucester (However, as discussed, there is no funding available at present).
2. It would very much benefit your proposals if they became part of the planning process.
 - o Identify your ambitions and the scope for onward connectivity in your forthcoming Neighbourhood Development Plan
 - o GCC Transport Planning will identify the desire lines for your routes in the emerging Local Cycling and Walking Infrastructure Plan for Stroud, (although there is no existing funding for any proposals)
3. You have already undertaken some work but still have funding available (in the region of £20k) to continue developing the proposals
 - o We think your funding would be best used at this stage to:
 - a) Develop the specific route, design and style for your proposal – we would suggest the route is discussed in sections
 - b) Ascertain the cost of your proposals (specifically broken down by section) so that these can be shared with developers if and when negotiations begin on the strategic allocation land, and to help you seek funding for the measures you require outside the scope of development sites. It also means you could build in stages, as sections receive pots of money, to avoid needing to fundraise for everything in one go.

We hope this helps you to move forward and will be referencing your plans in our own. We'd be very happy to keep in touch with you about your proposals, and can attend further site visits or online meetings as appropriate.



Appendix 7: Representation from Pegaus Planning on behalf of Robert Hitchins Ltd

This is included in the background documentation and is extensive running to 66 pages. It is therefore not replicated in this Consultation Statement.

Appendix 8: Details of second Regulation 14 Consultation.

Marine Management Organisation

24. No specific comments **No changes made.**

Gloucester Wildlife Trust

25. No specific comments **No changes made.**

Stonehouse Town Council

26. Stonehouse Town Council have agreed the following response to Standish PC's Neighbourhood Plan Regulation 14 consultation:

Standish Parish Council are congratulated on their work in producing a draft Neighbourhood Plan. Stonehouse Town Council particularly supports draft Neighbourhood Plan policy S3 on Sustainable Transport and proposals to promote sustainable, non-motorised transport links.

No changes made.

National Grid

27. No specific comments **No changes made.**

Coal Authority

28. No specific comments **No changes made.**

Highways England

Thank you for providing Highways England with the opportunity to comment on the pre-submission draft of the Standish Neighbourhood Plan. We are responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the M5 motorway which runs along the western boundary of the plan area.

It is noted that a small portion of the allocated strategic 'West of Stonehouse' SA2 site falls within the Neighbourhood Plan boundary. Stroud Local Plan, which was adopted in 2015, allocates 1,350 dwellings and 10 hectares of employment at the SA2 'West of Stonehouse Site' under Core Policy CP2. The Stroud Local Plan is currently under review and the pre-submission Draft which was published in May 2021 seeks to allocate 700 homes and 5 hectares of employment within the Standish Neighbourhood Plan area at the Policy PS19a 'Stonehouse North West Site'.

Policy PS19a of the draft Local Plan states that development should address 'Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location'. As set out in our response to the Local Plan Review, the Plan's Infrastructure Delivery Plan should reference the need for improvements at M5 Junction 13, in addition to improvements that will be required on the A38 and A419. Where development is likely to result in a severe or unacceptable impact on the safe and efficient operation of the SRN, it should not be permitted to come forward ahead of the delivery of the infrastructure required to mitigate its highway impact.

*Whilst it is acknowledged that it is for the Local Plan to identify and manage the delivery of infrastructure required to support the proposed PS19a strategic allocation within the Standish Neighbourhood Plan area, **we would recommend that the requirement for improvements at M5 Junction 13 to support the delivery of development at PS19a is clearly signposted within the relevant Policies of the Neighbourhood Plan.***

Our comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.

29. **New text added to policy.**

Pegasus Group 

30. Submitted on behalf of their clients Robert Hitchins Ltd and Redrow Homes regarding land referred to as PS19a. Three documents were submitted:

- Representations Report
- Appendix 1 – position statement submitted to Stroud Local Plan Review Regulation 19 consultation
- Appendix 1 – MHP Landscape and Visual Appraisal

31. Appendix 7 (a separate document) is a replication of the 66 page response.

32. The summary of required amendments and objections are copied here:

7. CONCLUSIONS

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

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

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

33. The representation contains a revised site masterplan that the Parish Council and SNDP Steering Group have not yet seen. This revised masterplan is referred to in this response and is shown here.



SNDP Response

34. This response will follow the outline of the representation and use the same headings for ease of comparison.

The Vision for Standish

35. The representation makes the case that the SNDP should only be in conformity with the adopted local plan policy but acknowledges that the Stroud Local Plan will be submitted to the Secretary of State in September 2021. On that basis, the SNDP will be examined at a point in time where the Stroud Local Plan will be material due to its advanced state and the emerging policies will be of greater weight than the adopted policies. The Basic Conditions statement demonstrates that the SNDP is in conformity with both the adopted and emerging local plan. No changes made.

36. The representation takes issue with some of the vision statements and requests that these should be amended. However, these statements are a true representation of what the Standish Community wishes to see for its own future. It is inappropriate for a site proposer to seek amendments to skew what the account of what a community wishes to achieve. No changes made.
37. With regard to the “new village centre” referred to in the Vision, the vision was generated before there were any specific proposals and only the early Stroud proposals were available which indicated that there would be a village centre. The representation now gives greater clarity on what will be provided which is welcomed. However, as will be explained below, the proposal does not meet the community’s requirements and the SNDP will seek to address this deficit.

Standish development framework

38. The representation raises objection to the SNDP para 55 statement that the development will cause harm to the landscape. This objection is not understood – the development will cause harm and the proposals in the proposer’s masterplan, supported by the LVIA included in it, provide mitigation for this harm in the form of substantial tree screening. No changes made.
39. It is proposed in the representation that Criterion F of Policy S1 “adds nothing to the adopted policies of the Stroud Local Plan”. This criterion sets the benchmark for landscape work and other matters such as tranquillity, biodiversity net gain, the type of Suds, and makes special reference to watercourses. This goes far beyond what the proposer’s landscape assessment covered. It would be detrimental to the purpose of the SNDP to remove this criterion and it does not repeat existing policy but adds local detail. No changes made.

Strategic Development sites

40. In para. 4.2 of the representation, it is stated that the relationship between the principles and the policy are unclear. This is not understood. The principles are the basis of the policy and explain why the provisions of policy S2 are necessary in a “golden thread”. No changes made.
41. Para 4.4 questions the use of “will” and suggests that “should” would be more appropriate in the wording of S2. This is questioned. When made, policy S2 will become part of the development plan. It therefore is appropriate that the policy will be followed and that it is not discretionary. It is appropriate to require applicants for major development to prepare a masterplan because this is the easiest way for the community to understand the proposal. No changes made.
42. The response objects to the requirement for a consultation statement because it is seen to be in conflict with the Stroud Statement of Community involvement and NPPF policy which does indicate that though encouraged, consultation is not mandatory. This is accepted and the wording of the policy will be modified to reflect the NPPF 2021. However, it is appropriate to require that a statement is made regarding the level of pre-application consultation that took place and no other changes are made. It is pointed out that the applicant undertook thorough consultation and had a meeting with the parish council to discuss the proposal. Not all recommendations have been accommodated in the most recent masterplan and it would be useful to the community to understand why their concerns were not taken on board. Note also that the Stroud policy uses “will” and not “should”.

43. The representation claims that some of the required evidence in support of an application is not referred to in the Stroud DC Validation checklist and therefore cannot be required. Though this is not accepted, the SNDP text has been modified to include reference that the required information can be part of the Design and Access Statement which is a requirement of all major development. The response indicates that some of the information required in S2 will be covered in the Environmental Impact Assessment and this is accepted, however, those results can be summarised in the Design and Access Statement. Some evidence required in S2, for instance the lighting strategy in clause G, would naturally be subsumed in the checklist's Lighting Assessment. The requirements of this policy are proportionate and necessary and reflect the concerns of the host community.
44. The statement made in 4.30 is contested. It states that the site's pedestrian and cycle links will connect to the surrounding network but the masterplan shows that this is only connecting the proposed development to existing development to the south. It does not demonstrate that the new residents at PS19a will have good access to the countryside because it does not seem to include the adjacent footpath network in the scheme though these routes are CONTIGUOUS to the development boundary and therefore arguably relevant to the scheme taking account of NPPF para. 57. The proposed masterplan does not provide necessary footpath and sustainable transport improvements which it is unarguable that the new residents will require. This part of the representation is, regrettably, seen as an attempt to avoid necessary sustainable transport infrastructure provision. No changes will be made as a result.
45. Looking in more detail at the proposed masterplan, though there is no "community centre" as envisaged by the SNDP, there are schools and playing fields. These are not accessible to existing residents because the sustainable transport network is not in place for them to access it. If a new school is provided in the PS19a scheme, it is very likely that children from the remainder of the parish will attend. There is NO direct access provided in the latest iteration of the masterplan that allows children to come to school other than be driven a very long and circuitous route into Stonehouse and back into the development. There should be clear, legible, useful transport links, as required in S2 and S3 that allow ALL parishioners to utilise the infrastructure provided by the scheme as PS19a.

Sustainable transport

46. The representation is correct in that the proposed development has the potential to cause harm to the PROW network because, without mitigation, there will be increased usage and an inevitable degradation of the infrastructure. The requested changes have not been made because this is necessary transport and green infrastructure that will satisfy a need arising from the proposed scheme.
47. Pegasus object to the policy because it is not seen as reasonably related according to NPPF par 57. However, Pegasus have not correctly read the policy which states that developer contributions "will be supported" indicating that it for the Local Planning Authority to secure any necessary infrastructure on the merits of any particular scheme. No changes made.

Site allocation at Stagholt Farm

48. The representation notes that policy S6 does not refer to the relationship with PS19a. This is correct and this omission is amended by adding a new clause to S2 and S4 to require interconnectivity.

49. The representation incorrectly states that policy S6 does not require the contributions to PROW and multi-user linkages. Development at S6 will probably be major development and policy S2 will therefore be applicable. Where development comes forward in a piecemeal manner as not Major Development, it will not be possible to secure significant developer contributions due to the small scale.

Historic England 

Thank you for your repeat Regulation 14 consultation on the revised Pre-Submission version of the Standish Neighbourhood Plan.

In our response to the original Regulation 14 consultation we highlighted the desirability of amending and/or enhancing the heritage evidence base associated with policies S1, S2 and S4. I have attached that response again here for information.

We advised modifying policy S1 so that all areas where possible development was identified (areas C, D & F) had the same consistent requirements relating to the protection and enhancement of relevant heritage assets. In short, development criteria for areas D & F would mirror those proposed for area C.

The modified Table 1 (p26) now states that development in this area would generally be inappropriate but that any proposals which came forward would need to be subject to a Landscape Assessment to determine their suitability relative to the setting of relevant heritage assets. We would reiterate our previous advice that a Landscape Assessment in its industry accepted form would not necessarily or automatically utilise a methodology best able to determine the setting of relevant assets in terms of the contribution it makes to their significance. On that basis we would strongly encourage wording to area C which repeats that applied to area D.

50. Text modified accordingly.

Development at site PS19a/South Standish is conditional upon the formal allocation of this site within the Local Plan. As the Local Plan proceeds towards eventual Adoption it acquires increasing materiality but until formal Adoption has been achieved the principle of site allocation and any specific development provisions of the site which the Local Plan aspires to cannot be automatically assumed.

However, neither policy S2 or S4, both of which are related and conditional upon the formal allocation of site PS19a/South Standish, are conditioned to this effect. We would therefore reiterate the desirability of both policies becoming effective subject to the formal Adoption of the Local Plan and its inclusion of this site.

51. Suggested amendment made.

Policy S4 is the only site allocation which the Neighbourhood Plan proposes in its own right and seeks to do this to fill a gap which would be created should site PS19a/South Standish be confirmed for development within an Adopted Local Plan. Our previous advice recommended that the evidence base for this proposal be enhanced to appropriately demonstrate that the site can deliver the development proposed without causing harm to heritage assets.

52. Policy S4 is related to Policy S2 which in turn relies upon Table 1 which sets out a requirement for heritage assets (see above). This policy is not meant to over-ride policies in the Development Plan which will themselves account for the protection and enhancement of the historic environment and assets. Figure 10 of the Planning Policy Context shows listed buildings in the parish. With regard to S4, there are no listed buildings on the site so it is not understood what further evidence is required. It is considered that overall, including all policies in the NDP and the Development plan, that this matter is adequately covered. No changes made.

Having looked at the supporting documents on the Plan's website we note that the Stagholt Farm Site Allocation Evidence Paper dated July 2021 makes no reference to the historic environment. The SEA Environmental Report in its Historic Environment section (p22-) states in para 5.33: "Development allocated by the Neighbourhood Plan through Policy S4 (Stagholt Farm) is unlikely to have any notable historic environment sensitivity as there are no designated historic assets within or adjacent to the site, and the site does not support views to or from the cluster of listed buildings at Standish village."

We do not necessarily dispute this assertion but would recommend that the basis of this conclusion is better substantiated as evidence, especially in its demonstration of how it is informed by the application of our guidance – particularly that on Setting – which we have previously drawn attention to. It is also disappointing that none of that guidance is referred to in the Environmental Report, a surprising omission given that it was identified in the SEA Scoping Report (see attached).

We would recommend that your community address the above issues before formally submitting your Plan to the local planning authority for Examination.

There are no other issues associated with the Plan upon which we wish to comment. Our best wishes to your community on the making of its Plan.

53. This representation was not understood. If HE do not dispute the assertion, and the planning policy evidence shows that there are no listed buildings, and the landscape assessment has not identified any issues, it is unclear what more can be done. HE has not provided any additional support or advice. An email seeking clarification was sent on 16 September 2021

which eventually included the conservation officer at Stroud DC. The full email exchange is copied in Appendix 9. The following wording has been included in policies S2 and S4

The cumulative impact of the proposed development on the wider setting of the group of listed buildings in Standish should be assessed, with particular reference to the encroachment of built form into the settlement's very significant surrounding historic landscape, including historic boundary features. Views from the Escarpment would be a key consideration.

G.C.C. Senior Planning Officer 

Ecology (Biodiversity) Comments

We note that the draft NDP has been updated following completion of SEA and HRA reports. The SEA report concludes that generally there would be minor positive or neutral effects for biodiversity which is reasonable but needs to be set in context of the HRA findings. The conclusions of the HRA report recommend safeguarding wording to alleviate recreational impacts upon European Sites. This has led to a few changes to the NDP content, notably policies S2 and S4.

Looking at the latest versions of development site policies S2 and S4 (including supporting text) we accept that these are improved to avoid an adverse impact on biodiversity in surrounding areas from recreational pressure.

54. **No changes made.**

Archaeology Comments

No further comments to make.

Libraries Comments

GCC ('the Library Authority') operates the local library services that will attract users from new housing developments in the Neighbourhood Planning Area (NPA). New users in the NPA will place additional pressure on these services, and this in turn could require mitigation in some form, proportionate to the scale of growth proposed. The Library Authority therefore requests that 'libraries' are added to the list of services and facilities that are within the definition of 'community infrastructure' as set out at Policy S2 (B), and in doing so library services would therefore also fall within the scope of the 'Community Infrastructure Access Study' referred to in the policy.

55. **"Library requirements" added to policy wording.**

Stroud Town Council Senior NP Officer 

NDP Section or Policy	Comment	Recommendation	SNDP response
P19, para 36	Although the conclusion of this paragraph is correct, in that the Parish of	Review wording	Have reviewed wording but have not made any changes since the

	Standish is deemed open countryside as it is entirely outside settlement development limits, there seems to be confusion as to the difference between a settlement and a parish. The town of Stonehouse is designated as tier 1, not the parish of Stonehouse, much the same as the nearby village of Eastington is deemed to be a settlement, and is therefore ranked in tier 3, but the Parish of Eastington is a separate entity and not part of this designation. Within the Parish of Standish, there is no settlement deemed large or dense enough to be designated within the settlement hierarchy		references to the NPPF indicate that it is open countryside. Para refs to the NPPF have been updated to account for 2021 changes. This text was substantially rewritten following the previous comments on the previous Reg. 14 draft.
P19, para 41	This relates to the above comment on para 35 and needs to make clear that it is referring to Standish as a village, and not the parish of Standish.	See comment.	Text amended – deleted “unclassified”
P21, Standish Development Framework	Consider an introductory paragraph explaining what the Standish Development Framework is. The term “development framework” is often associated with a suite of planning documents for a	See comment.	New sentence added.

	particular area(i.e. Local Development Framework, or LDF), whereas this is See comment more of a zonal planning guide.		
P22, para 52	See previous comments on settlement designations and why this doesn't apply to a parish as a whole.	Review wording.	Change made
P29, para 75	Changing the name of the sites in the NDP may cause confusion when interpreting the policy and cross referencing between the NDP and the Local Plan	See comment	It is regretted that the emerging Local Plan has not taken on board the Standish community's wish to be recognised in the development of PS19a. Residents of Standish do not feel that they are part of "Stonehouse" and do not feel that it is respectful or necessary to change their identity by referring to land in Standish Parish as North Stonehouse. No changes made.

Sport England

[REDACTED] (Residents)

We submit our comments regarding the July 2021 Draft Standish Neighbourhood Development Plan.

Firstly, we would like to thank all involved for this considerable piece of work and appreciate your time and effort in compiling it.

We make several comments and requests:-

Development areas

Flood risk information and policy

New Housing

Statements on development and development areas.

Within the NDP, the Standish Development Framework (SDF) is detailed in clauses 45 - 67. Within this, the Landscape assessment identifies 7 character areas 'illustrated in Fig 8 and Table 1'. The SDF is also further described in the subsequent S1 box that follows (p28).

It is confusing how Table 1 and S1 relate to each other; they are inconsistent and partly repeat each other. For example:-

Table 1:

gives area descriptions and also states what is appropriate, inappropriate and what should be resisted.

Area D; "development generally not appropriate unless demonstrated that historic asset setting is 'not harmed'".

Area F; no such similar comment as made for Area D.

Box S1:

In clause C; Areas D&F are lumped together, with 'not harmed' changed to 'protected, 'preserved and enhanced'. They are different areas so it would be clearer if Areas D & F are dealt with separately.

56. All numbering within policies for main clauses have been removed across all policies.

It might be helpful if Box S1 were amended to revert back to number clauses (as in the previous version). These have been changed to letter clauses which now confuse with the Area letters that they then go on describe.

Table 1 and Box S1 could be amalgamated, but for clarity and to avoid duplication and confusion, it would be helpful if Table 1 limits itself to the description of Character Areas (as explained in clause 66) and Box S1 details the framework plans and aspirations. Table 1 is a set of descriptions. S1 is a policy. These are different things and serve different purposes so they cannot be amalgamated. No change.

Box S1 SDF framework clauses state on development, variously:-

will be appropriate to its location

will normally be inappropriate

would generally be inappropriate

potential harm mitigated to an acceptable level (Clause B:- acceptable to whom?).

will respect character

will seek to avoid harm

but then changes tone immediately at Clause C, where discussing Areas D & F:-

will only be allowed where ...

This appears biased against any potential development in Areas D & F. The wording of Clause C should be consistent with the tone adopted elsewhere, so we suggest; 'will be appropriate to its location and should preserve or enhance the listed buildings and their landscape setting'. This wording will then be consistent with the previous clauses. 'Preserve or enhance' is consistent with the NPPF terminology and clauses.

57. Modified text for Areas E to be in line with other area text/policy.

Flood risk & Information on flooding

This 2021 version of the NDP makes considerably more reference to flood risk than the previous version, as follows:-

2.1 **Clause 31 (p15) describes flood history and prevention.**

This needs clarification, particularly since as part of the section 'HISTORY AND CONTEXT', this then informs the framework that follows.

The first draft in April 2020 had the wording on p14:-

In 2007, parts of Standish suffered under localised flooding. The Parish Council and others have worked since that time to seek to reduce flooding during severe weather events in Standish. Standish Court has suffered badly, particularly in the 2007 floods, but at other times too. Since 2017, a Rural Sustainable Urban Drainage System (SuDS) has been under discussion, seeking to install preventative measure 'upstream' that hold the water through woody dams and temporary ponds. Standish Parish Council persuaded Stroud District to incorporate the Arle Brook into a funding bid to the Environment Agency fronted by Gloucestershire Wildlife Trust (GWT). The bid was successful. The owners of Standish Park agreed to works being undertaken on their land, which is a key catchment area for the Arle Brook. This work has recently been completed. It is hoped that GWT will be able to work with other farmers whose land forms part of the catchment area. Standish Park and farms in the Arle Brook catchment can be seen in Figure 3.

We commented that this was inaccurate, and the wording has now been revised to that shown below (Clause 31 of revised version dated July 2021).

In 2007, parts of Standish, together with much of Gloucestershire, suffered from flooding. The Parish Council and others have worked since that time to seek to reduce flooding during severe weather events in Standish. Two houses in Standish Court have suffered from localised flash floods, particularly in the 2007 floods, but at other times too. Since 2017, a Rural Sustainable Urban Drainage System (SuDS) also known as Natural Flood Management (NFM) has been under discussion, seeking to install preventative measure 'upstream' that hold the water through woody dams and temporary ponds. Standish Parish Council persuaded Stroud District to incorporate the Arle Brook into a funding bid to the Environment Agency fronted by Gloucestershire Wildlife Trust (GWT). The bid was successful. The owners of Standish Park agreed to works being undertaken on their land, which is a key catchment area for the Arle Brook. This work has recently been completed. It is hoped that GWT will be able to work with other farmers whose land forms part of the catchment area. Standish Park and farms in the Arle Brook catchment can be seen in Figure 4

This wording gives an inaccurate and misleading picture of the flooding - particularly the phrase 'at other times too'. We offer alternative wording, which adds additional facts describing remedial measures undertaken, and is more accurate.

On 20th July 2007 two houses in the Court were affected by flash floods in an extreme weather event felt over vast swathes of the country. In 2013, one of those houses was again affected though to a lesser extent than previously.

Remedial works were then undertaken within the Court, notably; i) removal of obstructions within and over the Arlebrook including a disused footbridge, ii) dredging along its exposed length, and iii) renovation of sluice gate. Each of these contributed to improved flow capacity.

There have been no incidences of flooding since 2013, despite several other severe rainfall events.

58. **New text added to para 32.**

We are curious as to why only the flooding at Standish Court has been mentioned, and not other parts of Standish that have suffered from flooding – a more recent example would be

the houses at the bottom of Horsemarling Lane still suffering from flooding even when no problems have reoccurred anywhere in the Court.

A new clause 67 has been added, which amplifies the risk of flooding. This clause was not in the previous version, despite there being no further flooding incidence since that previous version. On the contrary, as is explained in some detail and referenced above, remedial works in the last few years, have indeed reduced the flood risk.

59. **The Steering Group in consultation with the Local Lead Flood Authority (LFFA) added this.**

2.2 Opposition to development on 'land subject to flooding'.

Box 3. NDP aspirations, particularly Development Framework, last sentence. Here, the comments on flood risk are amplified and a new clause has been added about development in Flood Zone 3. These are further detailed in Box S1. SDF. (p28), declaring 'Proposals on land subject to flooding, particularly residential development in Flood Zone 3 will not be supported'.

These statements did not appear in the previous draft of 2020.

60. **The NDP has been substantially modified in response to the first Reg. 14 consultation and this includes modifications from the LFFA.**

In our NDP Plan, we simply cannot say this about Flood Zone 3. Such declared opposition to development on land categorised Flood Zone 3, is too crude, and perhaps misunderstands the Environment Agency's Flood Map for Planning Risk.

The Environment Agency's Flood Zone 3 is based on flooding from rivers and seas rather than surface water flows from rainfall. As such the extent of the flood zone shown is exaggerated in order for local planning authorities to seek sufficient information from the applicants who wish to develop in the flood zone.

As the Parish Council (PC) will appreciate, banning all development in Flood Zone 3 rather than allowing an application to be determined in line with policy and regulatory approval from the Environment Agency and Gloucestershire County Council as the competent flood authority, blights land unnecessarily.

The PC will also appreciate that the Arle Brook does not follow the natural topography of land, rather it follows a route through Standish Court which would have historically fed the mill pond and leat. Examining the surface water flows and as evidenced in the 2007, 2013 and 2020 flood events, the Arle Brook was breached east of dwelling known as The Shieling and follows what can only be presumed as the original route of the stream.

With subsequent and appropriate management, the Arle Brook that passes through Standish Court has a low risk of deep flooding and that, in extreme rainfall events, surface water flows follow the historic and correct topographic route of the water course. As required under the EU Flood Directive 2007 the UK Government has produced a finer flood model that examines surface water flooding rather than only flooding from rivers and seas used to establish the flood zone areas.

link : [Surface Water Flood Mapping](#)

As can be seen when "Extent of all Flooding" is selected from the left drop down menu only flooding of "low risk" is shown within the curtilage of the Court. This is defined as

"Low risk means that each year this area has a chance of flooding of between 0.1% and 1%." The surface water flows also clearly follow the topography and confirming what has

also been experienced on the ground during these rainfall events. If you continue and select "high risk:depth" the surface water flows affecting the Court are starkly demonstrated. The point being that the Environment Agency flood zone mapping is too coarse to arbitrarily restrict development.

The effect of the draft wording is to significantly blight Standish Court when in fact, with correct maintenance and management of the Arle Brook flood events are now less likely to occur.

Ultimately perhaps a weir could be created at the point east of The Shieling that would formalise an existing route that surface water follows and that better manages flood water.

Please remove the wording;

'Proposals on land subject to flooding, particularly residential development in Flood Zone 3 will not be supported',

and replace with;

'Proposals on all land in Standish will have their applications determined in line with policy and regulatory approval from the Environment Agency and Gloucestershire County Council'.

We believe this is fair and equitable to all residents of Standish and the wording does not blight any properties unnecessarily.

61. This concern and the wording from the previous representation from Severn Trent Water and GCC as LFFA from the first Reg. 14 consultation have been reviewed. This requested change repeats, in abbreviated form, legislation and regulations regarding flooding. It is not appropriate for NDP policy to summarise existing legislation and national policy. The Parish Council, as the qualifying body have indicated that they will resist proposal on land subject to flooding and the wording is aligned to NPPF 2021 para 159. No changes made.

New housing.

Box 3 (p7) describes our aspirations under 4 policies. The first 3 receive further commentary in their sections in the body of the report, but the 4th, 'Housing Allocation' receives no such further commentary.

Our aspiration under Housing Allocation, is that *'New housing is carbon neutral with higher standards than other development'.*

Do we really mean this? Carbon neutral is a worthy goal, and we recognise the government has a net zero target for this by 2050 (currently). **This sets out the community aspirations, and is not the actual policy wording.**

Surely, we can only ask that new housing complies with prevailing planning and building regulations? These would presumably be in line with the government 2050 net zero target.

If we are demanding 'higher standards,' how is this enforceable? Additionally, we would need to clarify what is meant by 'other development'.

Box 3, column 2 however, words this aspiration as, 'New housing is carbon neutral wherever possible'. We think this wording is preferable.

62. Generally

Overall, this plan is a welcome focus on our Parish and how we wish to see it evolve in the future, particularly when, like many rural areas, it is under 'threat' from large scale development and economic growth of the nearby conurbations.

It would be easy to overreact to the 'newtown' threat and oppose any development, but we feel the NDP has responded to this very thoughtfully and thoroughly, so thank you.

However, we have to be realistic about development and small-scale infill housing. Standish struggles somewhat. We comprise a small number of dwellings, very spread out, some in isolated clusters and remain remote from one another. On the positive side this gives the opportunity to live in very low density, uncluttered spacious countryside surroundings (a large reason why most of us enjoy living here). On the negative side, we struggle to maintain and develop a sense of community, hovering at that boundary of critical mass for a thriving community.

The History & Context section of the NDP, bears this out, telling a tale of gradual decline of the community:-

- *"With only 120 households, Standish is a very small community."*
- *"Between 2001 & 2017, population of Standish dropped by 10% (Gloucester increased by 10% over this same time)."*
- *"There has been very little development in Standish. However, Stonehouse has grown significantly from a rural parish to the 2nd largest settlement in Stroud District."*
- *"At least 16 cottages have been lost, mainly located near the old village on Standish Lane."*
- *"Sadly, daily contact and inter-communication is infrequent as the parish is large and housing is scattered throughout."*

63.

Yes, this is sad. We believe a small number of dwellings within existing clusters, will help increase numbers, provide much needed influx and stimulate the thriving community many of us seek, without the slightest threat to the overall landscape and rural character of the parish.

There have been good examples of this over the last 10 years or so:- Tilia Barn; Elderberry Cottage; Little Haresfield; cottages adjacent to New Moreton Farm: extension to The Mews. These have all increased occupation and have had a positive effect on the parish.

We also need to be seen to have taken account of latest and up-to-date evidence of housing need (which we seem frequently reminded of).

Whilst we are not suggesting our NDP goes further in identifying specific infill areas for development, (although we are in fact entitled to do this), we suggest including an aspiration and policy to increase housing numbers through some organic growth.

It is an easy instinct to 'oppose' development. Rather, we should look favourably on small-scale infill development, which would contribute to meeting the housing need, seeing it as an opportunity to improve the parish community for us all, for current and future generations.

64. *This is an entirely new policy area that has been raised after almost 3 years of NDP work and was not raised in any of the previous consultation activities. It is perhaps better dealt with in the review of the NDP. Until that time, policies in the Local Plan will allow for organic growth in the parish as has always been the case. No changes made.*



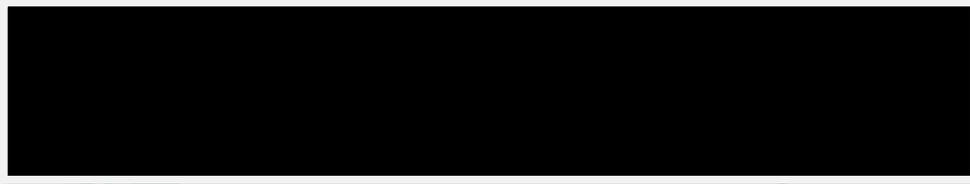
16 August 2021

Appendix 9: Full email exchange with Historic England and Stroud DC regarding heritage wording.

Good morning,

Just to clarify, I haven't said that I am happy from a heritage point of view- that could not be properly considered until an application was submitted. I was pointing out what I feel would need to be included to aid the consideration.

Best wishes,



Specialist Conservation Officer

Stroud District Council

Ebley Mill, Ebley Wharf
Stroud, Gloucestershire. GL5 4UB
Email: planning@stroud.gov.uk



*Working together to make Stroud district a better
place to live, work and visit*



Subject: [External] RE: Standish Neighbourhood Development Plan Reg 14 Consultation

Dear 

This is not about an objection but the need for satisfactory heritage evidence to substantiate the site allocations and the policy to reflect that.

I wasn't previously aware that the Ipa was happy with the site allocations, and especially  in particular as the Conservation Officer from a heritage perspective – hence my request for further clarification from . If her wording - that which you previously shared with me – is all that she requires to be inserted in the Plan at a relevant point to address any residual concerns that she might have then that can constitute satisfactory evidence. The important thing then is that her

advice is formally captured in the evidence base and accommodated within the Plan.

If, as I think you are saying, this has all been or will be done, then on the basis that we are happy to defer to the lpa's heritage expertise this is sufficient to address the issues we have identified.

Kind regards



On this basis, neither [redacted] nor I understand your concerns. Can you please be more specific? What is wrong specifically with the wording of the NDP and the policy? I have made my best efforts to address your concerns and even have included the HER data. I simply do not understand what your objection is and speaking to Kate, neither does she.

To be clear, on both Reg. 14 consultations, the LPA was satisfied in principle with the allocation and how I handled the evidence. The LPA has not raised objections on heritage grounds. If you cannot provide specific wording, then I must conclude that the LPA and HE are satisfied.

Thanks very much – I look forward to your clarification.



Many thanks for making further contact.

Unfortunately I don't understand what Kate has offered. Is this advice to the community on the further work which needs to be done to substantiate the site allocations? If so, this accords with my advice but doesn't get us much further.

If, as you intimate, it is intended as wording to be inserted into the Plan this doesn't on its own obviously address the need for further evidence/clarification to confirm that the site allocations proposed will not cause harm to relevant heritage assets.

Is [redacted] saying that the site allocations in principle are ok and the specific proposals for them but that what she has drafted should be inserted as a criterion into the allocation policy? If yes, then it would be helpful for her to confirm this in a more explicit manner. Having done so, and given that I have implied that I would be prepared to defer to the expertise of the Council's conservation officer on this issue, I would then be able to confirm that this addresses the points in question.

So it may be that you need to get back to Kate to obtain clarification.

Kind regards



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Subject: FW: Standish Neighbourhood Development Plan Reg 14 Consultation

Dear [redacted]

Thank you for your clarification. Unfortunately, I still do not understand what you are seeking. I took advice from [redacted] Specialist Conservation Officer from Stroud DC. She has provided the following words which I will insert into the Site Allocations and NDP document if you wish:

The cumulative impact of the proposed development on the wider setting of the group of listed buildings in Standish should be assessed, with particular reference to the encroachment of built form into the settlement's very significant surrounding historic landscape, including historic boundary features. I would suggest that views from the Escarpment would be a key consideration.

I will send you an updated version of the NPD taking your other comments into account for your information.

Does this satisfy your concerns and overcome your objection? If not, please provide the specific wording that you require, indicating where in each document you would like the text to be inserted.

Thank you very much



message -----



Thank you for your repeat Regulation 14 consultation on the revised Pre-Submission version of the Standish Neighbourhood Plan.

In our response to the original Regulation 14 consultation we highlighted the desirability of amending and/or enhancing the heritage evidence base associated with policies S1, S2 and S4. I have attached that response again here for information.

We advised modifying policy S1 so that all areas where possible development was identified (areas C, D & F) had the same consistent requirements relating to the protection and enhancement of relevant heritage assets. In short, development criteria for areas D & F would mirror those proposed for area C.

The modified Table 1 (p26) now states that development in this area would generally be inappropriate but that any proposals which came forward would need to be subject to a Landscape Assessment to determine their suitability relative to the setting of relevant heritage assets. We would reiterate our previous advice that a Landscape Assessment in its industry accepted form would not necessarily or automatically utilise a methodology best able to determine the setting of relevant assets in terms of the contribution it makes to their significance. On that basis we would strongly encourage wording to area C which repeats that applied to area D.

Development at site PS19a/South Standish is conditional upon the formal allocation of this site within the Local Plan. As the Local Plan proceeds towards eventual Adoption it acquires increasing materiality but until formal Adoption has been achieved the principle of site allocation and any specific development provisions of the site which the Local Plan aspires to cannot be automatically assumed.

However, neither policy S2 or S4, both of which are related and conditional upon the formal allocation of site PS19a/South Standish, are conditioned to this effect. We would therefore reiterate the desirability of both policies becoming effective subject to the formal Adoption of the Local Plan and its inclusion of this site.

Policy S4 is the only site allocation which the Neighbourhood Plan proposes in its own right and seeks to do this to fill a gap which would be created should site PS19a/South Standish be confirmed for development within an Adopted Local Plan. Our previous advice recommended that the evidence base for this proposal

be enhanced to appropriately demonstrate that the site can deliver the development proposed without causing harm to heritage assets.

Having looked at the supporting documents on the Plan's website we note that the Stagholt Farm Site Allocation Evidence Paper dated July 2021 makes no reference to the historic environment. The SEA Environmental Report in its Historic Environment section (p22-) states in para 5.33: *“Development allocated by the Neighbourhood Plan through Policy S4 (Stagholt Farm) is unlikely to have any notable historic environment sensitivity as there are no designated historic assets within or adjacent to the site, and the site does not support views to or from the cluster of listed buildings at Standish village.”*

We do not necessarily dispute this assertion but would recommend that the basis of this conclusion is better substantiated as evidence, especially in its demonstration of how it is informed by the application of our guidance – particularly that on Setting – which we have previously drawn attention to. It is also disappointing that none of that guidance is referred to in the Environmental Report, a surprising omission given that it was identified in the SEA Scoping Report (see attached).

We would recommend that your community address the above issues before formally submitting your Plan to the local planning authority for Examination.

There are no other issues associated with the Plan upon which we wish to comment. Our best wishes to your community on the making of its Plan.

Kind regards



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