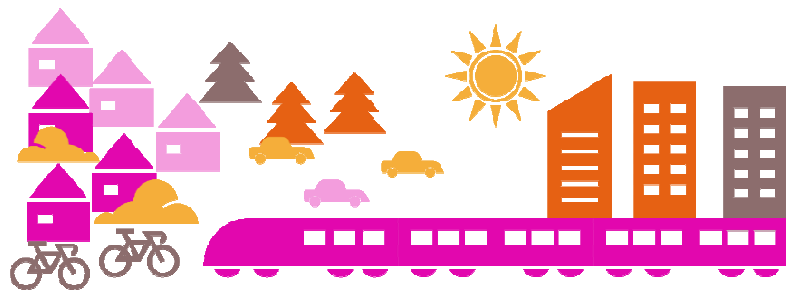


Stroud District Council Local Plan Review: Emerging Strategy Consultation
2018

Standish Parish Council

(5th February 2019)



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Introduction

██████████, as part of the preparation of the Standish Neighbourhood Development Plan, was asked to prepare a draft response to the Stroud District Local Plan Review: Emerging Strategy 2018, expressing the views of Standish Parish Council.

This response considers mainly those questions that were relevant to the preparation of the Standish neighbourhood development plan, with some additional comments from the Parish Council, including those relating to the broader Local Plan Review.

1.0a Have we identified the top 5 issues for you?

Yes

1.0b Do you agree with the ways we intend to tackle them?

As will be shown in other responses, Standish Parish Council does not believe that Key Issue 1 (ensuring that housing development is in the right place) and Key Issue 2 (conserving and enhancing the countryside) have been properly addressed in the consultation document.

Our concerns are set out below:

Key Issue 1: Standish Parish Council questions whether the proposed allocation PS19b offers "the best access to services, facilities, jobs and infrastructure". Though there is arguably good provision in Stonehouse, the land in question is currently so starved of provision that it is unclassified and is not even designated as a Tier 5 area.

Infrastructure provision will be improved with the current allocation at Great Oldbury (SA2), but this infrastructure has not yet begun to be developed and experience shows that community and commercial infrastructure is one of the last parts of a strategic development to mature to the point where it can address the needs of neighbouring developments.

This situation will be exacerbated if a strategic allocation is made at PS19a. Whereas PS19a adjoins the Great Oldbury site and it could be argued that infrastructure could be shared by the developments on the allocations, the same could not be said of PS19b which is physically separated by a railway from Great Oldbury, with no motorised road link between SA2 and PS19b, and by allotment land from the edge of the Stonehouse settlement.

Key Issue 2: Stonehouse Parish has begun to prepare a neighbourhood development plan which will consider the matter of green infrastructure and connectivity in Stonehouse's hinterland. Standish Footpath 6 runs along the southern perimeter of PS19b. Though the site could be developed for housing and the footpath could remain in use, as a link between urban and rural, it would be preferable if the rural character of this footpath were maintained.

The proposal to include PS19b as a strategic allocation will reduce the ability of the neighbourhood plan to put into place a robust and attractive footpath/bridleway/cycleway network to improve accessibility between housing developments and the rural hinterland. In addition, as the 2017 Site Assessment for PS19b has demonstrated, there is a potential negative impact on the AONB if the site were developed. This would be contrary to Key Issue 2.

2.4a Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?

No

2.4b Do you support an alternative approach, or have we missed anything?

In the "what you told us" box, the consultation document stated that comments identified a need to improve access and connectivity between open space provision and community facilities within neighbourhoods and better bridleway/cycle infrastructure linking communities.

The way that the key issues are interpreted in the Stonehouse Cluster (page 62) would indicate that it is intended to improve these networks within Stonehouse, particularly along the canal and in relation to the railway station. Though Standish Parish does not object to this, these proposals do little to improve connectivity between open spaces and communities at the northern part of Stonehouse.

The supporting text describes Standish as "amongst the most sparsely populated parishes in the district". This very feature is a strength when considering the objective of linking the growing Stonehouse community with its rural hinterland.

The Parish Council has commenced work on its neighbourhood plan which will specifically address how linkages between rural parts of Standish can serve the needs of Stonehouse's growing population. The Local Plan should not stifle or hinder the potential for Standish to provide valuable green infrastructure and healthy informal recreation opportunities for Stonehouse and should consider that the canal network is not the only one that could benefit from planning and investment.

With regard to community facilities, Standish has only very limited access locally. New development at SA2, and at PS19a should that proceed, should make provision for existing Standish residents. This will be a matter for the emerging neighbourhood plan to consider. The existing community facilities already proposed for SA2 are inadequate, and it is the parish council's understanding that the GP and dentist practices in Stonehouse are already full to capacity and closed to new patients. The proposed addition of 500 new houses adjacent to this site is therefore unsustainable unless facilities are significantly improved and housing numbers reduced to levels that can be met.

Question 4.3a: Are any of the settlements in the wrong tier, and if so, for what reason?

Standish Parish is not included in the hierarchy (it is unclassified). Correspondence with ██████████ in December 2018 queried this approach and in his response, ██████████ said that according to the scoring system used to determine which tier a given settlement was assigned to, Standish was not able to meet even the lowest criteria. He said in an email dated 10 December 2018 “I am afraid that the detailed settlement analysis work that sits behind the settlement hierarchy has not identified Standish as a settlement of sufficient size or services to warrant designation as a tier 5 settlement.”

Standish is therefore not included in the settlement hierarchy and is in the ambiguous position of also being one of the proposed major contributors of housing land. Therefore, according to this approach, the Parish is at the same time the “least sustainable” (unclassifiable in the settlement hierarchy) and “most sustainable” (the location for two potential major site allocations (PS19a and PS19b).

Whilst strategic allocation SA2 is within current proposals by Stroud District Council for the Stonehouse cluster (a tier 1 settlement), the adjacent PS19a is in an “unclassified” location. It could be argued that PS19a can become, in effect, an extension to Stonehouse, however, its location in the “unclassified” category leaves the emerging neighbourhood plan in some difficulty. The policies within which it must be prepared do not apply to the proposals it should address. It would be helpful if this policy ambiguity were addressed in the local plan so that the neighbourhood plan can meet the requirement of conformity with the development plan.

The same argument cannot be made for proposed site PS19b which is physically separated from the Stonehouse settlement and therefore would not be as likely to become, in effect, an extension to Stonehouse. Whereas access from PS19a could be through SA2, thus not generating additional traffic on the B4008, PS19b access could only be onto the B4008 which is an unsuitable road for the potential additional 300 movements at peak times. Again, the position of this site as “unclassified” is ambiguous and it is unclear how the emerging neighbourhood plan should address this site and the proposal.

It is recommended therefore that if Standish cannot be a tier 5 settlement, a new settlement level should be created to address the conflict between the need to manage non-strategic development against the need to accommodate strategic development (which will be required to provide its own infrastructure).

Question 4.4a: Do you support the emerging Strategy's approach towards maintaining settlement development limits?

This response should be read in conjunction with the response to 4.3a which states that Standish is in an ambiguous policy position where it is “unclassified” since it fails the tests to

meet tier 5 criteria and is also a major development site. The ambiguity arises where there is a presumption against single dwellings but a proposal for hundreds of dwellings and this is difficult for the emerging neighbourhood plan to address.

The proposal under section 4.4 states that the new approach will be to allow “some limited development beyond settlement developments limits”. However, proposed urban extensions PS19a and PS19b are not “limited development”.

Based on the Strategy’s approach towards maintaining settlement development limits, neither PS19a nor PS19b should be allowed.

Question 5.0.a: Do you support the proposed mini-visions for your area?

Standish is described as “amongst the most sparsely populated parishes in the District, with a strong rural character.” This is an accurate description.

Overall, the description paints a picture of “good road access”. This is accurate for routes such as the A419 which is subject to congestion at some times,. Although Stonehouse has good rail links, the lack of a station on the Bristol line is a real issue. New developments near the M5 are bound to attract people working in the Bristol area, and without rail links, will create an unsustainable increase in car use for this fairly long journey.

The description fails to mention the proximity to the M5 which is probably the single most important feature that will enable strategic growth under SA2 or proposed urban extensions in this cluster. The M5 can be accessed via Junction 13 on the A419 which is a major route. The M5 can also be accessed via Junction 12 on the B4008 which is a narrow and winding road that is not suitable for heavy traffic leading to the junction and, in recognition of this, has a weight limit restriction.

The description should therefore mention the M5 specifically and the good connections to the M5 via Junction 13. However, it should also make clear that access to the M5 via the B4008 will be avoided where possible and that all traffic generated by SA2 and the proposed additional urban extensions will be directed towards Junction 13 and not Junction 12.

Should the strategic allocation at PS19a proceed to the next stage of consultation, work will be required by the planning authority to ensure that access will be directed towards suitable strategic routes (i.e. the A419 and Junction 13) and away from unsuitable rural roads such as the B4008.

As stated above, it will be possible to ensure that traffic from PS19a will flow to Junction 13, but it is likely that traffic from PS19b would flow in either direction – Junction 12 or 13. It would be difficult if not impossible to direct flow from PS19b away from Junction 12 since the main access to this site would be onto the B4008. The easiest route from this site to the

M5 would be along the B4008 and this would cause an unacceptable increase in traffic onto this road. This is a major factor in rendering this site unsuitable as a strategic allocation.

Question 5b: Would you like to propose alternative wording for any of the mini-visions?

Stonehouse Cluster

Proposed alternative wording (bold italics):

Where are we now?...By contrast, Standish and Frocester are amongst the most sparsely populated parishes in the District, with a strong rural character. ***The B4008 flows though Standish to Junction 12 of the M5. This road is unsuitable for significant increases in traffic and housing proposals will be required to access the A419 and the M5 at Junction 13.....***

Draft vision to 2040....Stonehouse is one of the District's employment hotspots and, with its good rail and road links, ***including Junction 13 to the M5***, it is well placed for future growth....including improved links to the town centre ***and northwards towards Gloucester***

...The area will feel the environmental enhancement of both the river corridor and the canal restoration, with boosted tourist appeal contributing to the local economy. ***Green*** links will be improved into the countryside, ***improving connections between the urban area and the rural hinterland and the AONB***, providing a valuable amenity for residents of Stonehouse and surrounding communities....

Question 5.0c: Do you support the identified key issues and priorities for your area?

These should include: Reducing A419 road congestion ***and avoiding any increase to traffic on the B4008...***

Question 5.0d: Are there other important issues and priorities you would like to highlight?

Stonehouse Cluster

It is of significant importance that new development in the Stonehouse cluster does not add significant increases in traffic levels on the B4008.

The emerging Standish neighbourhood plan is likely to seek to improve green links and access via the PROW between new housing developments and the countryside. Evidence has already been provided to the Highways Authority and accepted, that improved multi-user cycle, horse riding and pedestrian links should be created. The neighbourhood plan will refine these proposals and will seek to create better access for new housing in SA2 and, if it were to proceed, PS19a to the countryside and to provide sustainable transport links for the

existing Standish community to new facilities and infrastructure in the strategic development sites.

Question 5.1a Have we identified the best sites?

Standish Parish is very rural in character and is “unclassified” in the settlement hierarchy. Local residents are preparing a neighbourhood plan which is likely to consider such issues as improved access between the Stonehouse settlement and the rural hinterland in Standish and wider access to the AONB. It will seek to find a balance between the need to provide new housing and to protect the intrinsic beauty and tranquillity of the countryside. It will seek to provide access to essential community infrastructure for current and future residents and will seek to encourage equal access for all residents. It will seek to promote sustainable transport modes within the parish and linking to other areas.

PS19a

Some development at 19a would not be unacceptable provided that access was directed through SA2. The proposed development should not provide motorised access to the B4008 and access over the railway line should not be created. Traffic should be directed towards the A419 and Junction 13, and not the B4008 and Junction 12. However, considering the existing pressure on the A419, the proposal for 500 new homes at this site is considered to be over-development. Standish Parish Council would prefer to see no development to the East of the site that is bounded by an access road to Stagholt Farm. However, if this field is to be included in the scheme, the Parish Council would argue strongly for it to be reserved as playing fields and other recreational open space. A lower level of development will help ensure no development of a motorised route to the B4008; will limit increased traffic on the A419; will maintain some rural tranquillity for Stagholt Farm; and will reduce numbers and resulting pressure on services in Stonehouse. New development at PS19a should provide good and pleasant sustainable transport access to the rural hinterland in Standish so that there can be a free flow of pedestrian and cycle movement between the urban and rural areas. Green infrastructure in the new development should retain wildlife corridors linking the site to the rural hinterland. Any development should stop short of the ridge to the north of the site, in order to limit its visual impact. The site should be subject to a master plan that recognises the need to allow the new development to create successful social, environmental and transport links between the existing and new community. Standish Parish Council should be consulted on the master plan and seeks clear assurance that there would be no general motorised access onto the B4008.

PS19a is adjacent to SA2 which is in the early stages of development. It is likely that it will take several years for SA2 to be built out and fully occupied. It is important to let this development be created and bedded down before another adjacent strategic development were started. Therefore, it should be a requirement for the development of PS19a that development could not commence until development at SA2 had been occupied and the

proposed infrastructure put in place, or if this is not possible, that the northern part of SA2 has been occupied.

PS19b

Proposal 19b is strongly resisted. It does not relate well to the existing urban area or to PS19a. The site will be physically separated from the urban area by playing fields and allotments and is a considerable distance, which is too far to walk, from Stonehouse town centre and amenities and as such, is not sustainable. It would not be connected to Great Oldbury (SA2), nor is it of sufficient size to attract infrastructure, and so is not suitable for these reasons as well. Currently, Horsemarling Lane provides a boundary to 'edge of Stonehouse' development on the B4008, and this boundary should not be breached.

Proposal 19b has potential to cause harm to the setting of the AONB and will cause an increase in traffic to the B4008 which is not suitable for heavy traffic flows between Stonehouse and Junction 12 of the M5. Development on this site would harm the view of the AONB from Stonehouse and would detract from the rural character of Standish which would already be changed if PS19a (in whole or part) were to proceed. The site is currently in use as agricultural land and its loss would be detrimental.

General Comments on the Local Plan Review

Standish Parish Council sees merit in the proposals for significant development around Sharpness and Newtown. The area has suffered significant economic decline over decades and a development that is substantial enough to warrant major infrastructure improvements would be welcome, subject to satisfactory consultations with the local community. We are less convinced that development at Wisloe would be appropriate. Wisloe is close enough to Sharpness for there to be concern that development there could undermine the prospects of economic development at Sharpness, meaning that both sites could become dormitories for people working elsewhere. There are two other issues of concern in relation to Wisloe. We understand that the proposed site is high quality farming land, which would be lost if there was to be extensive development: the proposal for development would seem to go against the requirement in the NPPF to recognise the economic and other benefits of the best and most versatile agricultural land. Secondly, the development could cause a coalescence between Slimbridge and Cam, and have an adverse impact on their distinctive identities and characters.

Standish Parish Council is concerned about the potential ceding of the allocations in the north of the district, around Hardwicke and Whaddon, to Gloucester City Council and takes the view that this should be resisted if at all possible.

Standish Parish Council would like to see more opportunity for smaller rural communities to build affordable homes for their young people and for older people who wish to transfer to smaller properties whilst remaining in their familiar community and support networks.