

STANDISH NEIGHBOURHOOD DEVELOPMENT PLAN

Notes for an Exploratory Meeting prepared by

by Independent Examiner, Rosemary Kidd

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1. I was appointed as an independent examiner to conduct the examination on the Standish Neighbourhood Development Plan (SNDP) by Stroud District Council (SDC) with the consent of Standish Parish Council in December 2021.
2. During my examination of the Submission Draft Neighbourhood Plan and the supporting background evidence I have become concerned about the lack of clarity in the drafting of the policies and justifications in the Plan and the approach to proposed site allocations.
3. I have asked Stroud District Council to arrange a non-statutory exploratory meeting to examine issues of a procedural and compliance nature with regard to the Standish Neighbourhood Plan. It will not be a public hearing held under the provision of the relevant neighbourhood plan legislation.
4. Whilst the meeting will be open to the public, I will only be inviting the participation of representatives of Standish Parish Council and Stroud District Council.
5. Once the plan is made it will become part of the development plan alongside the Local Plan. It is important therefore that policies are worded so that they can be used in the consideration of planning applications.
6. National planning guidance states that *“a policy should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area”*.
7. When examining neighbourhood plans, examiners have the opportunity to recommend modifications to the plan to clarify the wording of policies or correct errors. However, I consider that there are fundamental flaws with the Standish Neighbourhood Plan that cannot be rectified by modifications to the wording of the policies and the text of the plan.
8. I am aware that the Parish Council have invested considerable time and effort in preparing the draft neighbourhood plan. The purpose of the exploratory meeting is to facilitate a discussion between the Examiner, the Parish Council and the District Council to assist in understanding the main areas of concern with this plan and the way forward with the examination. These relate to:
9. **Policy S1** which seeks to establish a development framework for the plan area based on sub-divisions of the area. However, areas A to F are all in the countryside outside of settlements where development would only be acceptable in exceptional circumstances in accordance with national and strategic policies. The policy is considered to be unnecessary and unclear and adds nothing to aid the interpretation of strategic policies.
10. **Policy S1 area G** seeks to change the name of a proposed site allocation in the Submission draft Stroud Local Plan Review. This is considered to be a matter

- that is not within the jurisdiction of the plan makers and in any case this is not a planning policy.
11. **Policy S2** sets out a number of studies and assessments that the plan makers wish or require to have undertaken as part of preparing a masterplan for the proposed site allocation referred to in the Local Plan Review as site PS19a. The policy is dependent of this site being allocated in the Local Plan Review when adopted. The wording of the policy and the supporting text is confused and unclear.
 12. **Policy S2** Some aspects of these assessments are standard requirements such as a transport statement of transport assessment whereas other aspects set out requirements that cannot be prescribed through a neighbourhood plan policy for example how consultations are to be carried out with the Standish community and how the Standish community will have equal transport and social access to new community infrastructure. Some aspects of the policy are very detailed and prescriptive covering matters that are more suited to supplementary planning guidance and are not appropriate for planning policy. The policy does not consider significant aspects of the proposed allocation and only considers those matters that may impact on the rest of the plan area.
 13. **Policy S2** The policy also requires these same assessments to be undertaken for any major development site in the plan area which is considered to be an excessive requirement.
 14. **Policy S3** This policy includes a number of statements about improving the public rights of way and strategic cycle network in the plan area. It also seeks developer contributions towards a multi user path. However, the route is set out as three options and it is evident that the proposal has not been finalised as is necessary if it is to be included as a proposed route in a planning policy. In any case, neighbourhood plans are advised in the PPG to include a list of prioritised infrastructure required to address the demands of the development identified in the plan area. These should be set out in a separate section of the plan and not in a planning policy.
 15. **Policy S4 Stagholt Farm** This is a proposed site allocation that is dependent on site 19a being allocated in the Local Plan Review. It is not possible to make a conditional allocation in a neighbourhood plan. It cannot therefore be progressed in advance of the Local Plan Review being completed. In any case the policy wording is unclear and imprecise. There are some detailed matters in the policy whilst basic matters such as access to the site have not been addressed.
 16. **Policies Map** the plan should include a Policies Map to show the boundary of the plan area and the location of any sites referred to in the policies.
 17. **Vision** This is poorly drafted and further consideration should be given to how the community wish to see the parish change over the next 20 years bearing in mind the proposed development allocations. Objectives should be set out clearly to provide the focus for the policies in the plan.
 18. **Consultation Statement** This needs to be revised and updated to set out clearly the details of the consultations that has been carried out in preparing the plan including evidence of the publicity and surveys undertaken.
 19. **Local Plan Review** It would be helpful to understand the timescale for the Local Plan examination and subsequent stages of the preparation of this Plan.