

**Re: Standish Neighbourhood Development Plan (NDP) – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended) and the Localism Act 2011**

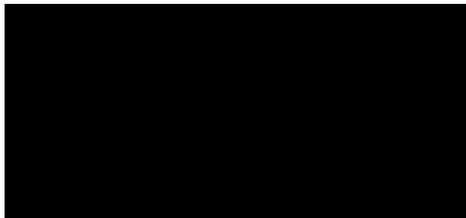
To fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the Council has commented on the emerging Standish NDP on a number of occasions.

We are committed to helping the qualifying body deliver a successful plan. In order to achieve that, we take this opportunity to offer constructive comments on issues that we consider have not yet been addressed in a satisfactory manner.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions.

Yours Faithfully



Planning Strategy Manager

Stroud District Council

**TABLE 1**

<b>NDP Section or Policy</b>	<b>Comment</b>	<b>Recommendation</b>
<b>P19, para 37</b>	The policy relating to settlement hierarchy within the Local Plan is actually CP3, not CP2 as stated. The wording should be amended to reflect the supporting text of the policy in that areas outside the settlement hierarchy will be treated as “open countryside”, not designated, as stated.	Change wording to: <b>“Policy CP3 of the Local Plan designates Stonehouse as a Tier 1 settlement. There are no designated settlements within Standish Parish and it is therefore deemed to be “open countryside” within the settlement hierarchy context. Development should therefore be restricted to “that which contributes to diverse and sustainable farming enterprises, recreation, tourism and essential community facilities”</b>
<b>P19, para 42</b>	This paragraph appears to confuse a settlement with a parish and should distinguish between the Parish of Standish, and settlements within Standish.	Change wording to: <b>“The Draft Local Plan proposes that Stonehouse will remain in Tier 1 and that no settlements within Standish Parish outside the proposed strategic allocation will be allocated and will therefore be treated as open countryside where only very limited development will be allowed”</b>
<b>P22, para 56</b>	The use of the term “ <i>dramatic and harmful</i> ” <i>landscape impact</i> ” is emotive and should be avoided. The rest of the paragraph should also be rephrased to reflect the <i>potential</i> impacts. Bullet point 4 would also be deemed to be an ecological impact rather than a landscape impact so should be re-phrased.	Change wording to <b>“Taken together, the current SA2 allocation and the PS19a allocation could potentially have a negative landscape impact. Potential negative impacts are:</b> <ul style="list-style-type: none"> <li>• <b>Views into and out of the AONB</b></li> <li>• <b>Loss of green infrastructure</b></li> <li>• <b>Loss of landscape features such as trees and hedgerows</b></li> <li>• <b>Urbanisation of Public Rights of Way”</b></li> </ul>
<b>P29, para 75</b>	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

	Proposed allocation PS19a would be seen as an extension to the <i>settlement</i> of Stonehouse, regardless of which civil Parish it falls within.	
<b>Sustainable Transport Evidence P6, para 8</b>	A strategic development would not be contrary to a current planning policy as that policy will be superseded by the subsequent Local Plan which contains the allocation.	Delete this paragraph
<b>Planning Policy Evidence p24, para 31</b>	The wording states that a need has been identified for the proposed development at Stonehouse North West. This could be misleading as the need is identified for the District as a whole. The paragraph goes on to set out the aim of the NDP to have the site renamed. See comment above for <b>P29, para 75.</b>	See comment
<b>General</b>	There appears to be some confusion running through the NDP concerning the difference between a settlement and a Civic Parish and how planning policies are interpreted for each of these entities. This is highlighted by the desire to change the name of the emerging site allocation identified in CP2 of the emerging Local Plan, and the interpretation of policy CP3 in both the adopted and emerging Local Plans relating to the settlement hierarchy. Some instances of this have been highlighted above.	See comment