Standish House Draft Planning Concept Statement: Summary of consultation responses received

Respondent	Summary of comments	Council response
Mrs T. Organ	I would ask that at least a section of the site be dedicated to	The document states that should residential development
	self-build plots, which I am confident would deliver a much	come forward at the site as enabling development, this
	better community and aesthetic result. The sale of these	should include a mix of types and tenures to reflect local
	plots would help towards funding the restoration work.	needs.
	I would also hope that mechanisms would be included to	It is agreed that mention should be made of self build and
	prevent wealthy Londoners or foreign investors exclusively	custom build opportunities.
	benefiting from the site, as opposed to local people.	Recommendation:
		Add "Opportunities for self build and custom build housing
		should be investigated." to Housing section (Page 17)
Shirley Dicker	Standish should still be about health. You should keep all the	The document identifies medical facilities and care
	blocks which could be turned into apartments for the	accommodation as acceptable uses on site.
	elderly. The main building should be a hospital for people to	
	recover from illnesses.	Although the site is not in an appropriate location for
		residential development, some residential uses may be
	The ground should be restored.	necessary to fund the restoration of Standish House.
	It should not be another housing estate as it is in the wrong area.	Recommendation: No change
Highways England	We have no comment on the statement but would wish to	The Council will consult Highways England on any future
0 , 0	be consulted on any planning application submitted in respect of this site.	planning application.
		Recommendation: No change
Pat Harper	A blue plaque should be attached to the main house at	A blue plaque will be subject to further investigation.
•	Standish, referring to the birth of Beatrice Webb.	
		The document identifies a residential college as an
	In view of the Potter family and their relatives' importance, a	acceptable use on site.
	residential college which prioritises political education would	
	be following on in their footsteps.	Although the site is not in an appropriate location for

	Alternatively a health facility would be suitable, but, in view of the family's ethos, it would have to be in the public sector. I am totally against the use of the House as a private residence.	residential development, some residential uses may be necessary to fund the restoration of Standish House. The main block was the home of the Potter family and so a single residential re-use of the house would be appropriate. Recommendation: No change
Cotswolds Conservation Board	The Board supports the appropriate re-use of the site through development/re-development subject to any proposal conserving and enhancing the character and special qualities of the nationally protected AONB and its heritage assets.	Welcome support.
	It is recommended that the Statement is amended to include specific reference to Paragraph 14 (footnote.9.) and Paragraphs 115 and 116 of the NPPF as any development of this site, being within the AONB, will have to be considered through these policies.	Recommendation: Add "Paragraph 14 (footnote 9) – Area of Outstanding Natural Beauty Paragraphs 115/116 - Area of Outstanding Natural Beauty (National Policy section, Page 12)
	It is also recommended that specific reference is made to the need for a detailed Landscape and Visual Impact Assessment whether part of an EIA or separately from an EIA (if an EIA is not required) to allow the impacts of any development to be fully considered.	Add "Landscape and visual impact assessment " to list of supporting documents on page 23.
Sue Childs	Please ensure this site is brought back to life, hotel, care home, housing etc. without wasting any more time. The plans will need to include public access across the land.	The document will assist in the timely re-use and if necessary redevelopment of the site. Welcome support. Recommendation: No change
Mid Cotswold Tracks and Trails Group	We endorse the need to preserve the particular character of this site and especially welcome the aspiration to maximise public access to the site through the creation of a network of public routes. The final scheme should seek to create more	Welcome support.

opportunities for walkers, mobility scooter users, cyclists and horseriders to enjoy the parkland setting in this lovely landscape. On a more practical level, MCTTG would point out: These detailed points will be taken into consideration when The gate at the north end of the site does currently considering a future scheme, having regard to the principles require a rider to dismount in order to untie it. This needs of public access included within the document. attention. There is a horse stile there which obviously would need reconsideration, should that entrance be considered for emergency vehicular access, and to facilitate the growing band of Disabled Ramblers, who are effectively obstructed from this route, being unable to negotiate the existing boards with their all-terrain scooters. The designation of Horsemarling Lane as the main means of vehicular access is sensible, as the lane to the north of the site is most unsuitable. Should the site's redevelopment have to include The document makes clear that vehicular access to the site substantial new housing, measures would need to be taken from the north will not be available, apart from emergency to shut off unauthorised vehicular access beyond Moreton access. Hill Care Home, to avoid inappropriate use of the byway, a rough lane leading to Sandpits Lane, which might become a Recommendation: No change "ratrun" for motorists How will houses on Horsemarling Lane be protected from The document states that proposals will need to consider heavy traffic? How will the many people from Stonehouse appropriate improvements to vehicular access and address who use the Lane to walk with dogs, children and also wheel any impacts on the local highway network (see Movement chair users be protected from the increased speeding traffic section, page 10). which will result from the initial development work and subsequent use. Such things as traffic calming, speed limits **Recommendation:** and road improvements must be considered. Add "including the potential need for traffic calming " after

		"address any impacts on the local highway network" on page 10.
	Property owners along the Lane do not have any knowledge of a sewer along Horsemarling Lane there are only ditches, one being a stream. All drainage covers along the lane are blocked up. All properties along the Horsemarling Lane have their own septic tanks and no public sewer.	This information will be passed on to the owners of the site. The document sets out the results of drainage survey work undertaken to date. Recommendation: No change
Gloucestershire Garden and Landscape Trust	At this stage, GGLT welcomes the recent partnership intervention by the LCA and SDC on this site where to date no viable development proposition has come forward. From GGLT's viewpoint, the basic survey work is very comprehensive and leaves in no doubt the built, landscape and natural assets of the site.	Welcome support. The document seeks to achieve design quality through the application of placemaking principles. Recommendation: No change
	The key issue here is to establish real design quality and an appropriate scale and character for the development. It should aim to do a lot better than the volume housebuilders norm.	
Environment Agency	We support the content of the Draft Concept Statement for the Standish Hospital Site and concur with those key issues highlighted on pages 7-11.	Welcome support. Recommendation: Add
	Detailed guidance is set out regarding flood risk, climate change, foul drainage, Water Framework Directive, Biodiversity, Ground conditions and Waste management.	 Core Policy CP14 - High Quality Sustainable Development Delivery Policy ES4 - Water Resources, Quality and Flood Risk
	Whilst we note page 13 of the document makes refers to certain specific policies relevant to the redevelopment of the site, (we accept this list is not exhaustive), we would also recommend reference be made to the following policies which cover the above advice:	to the list of emerging policies on page 13 on page 10.

	Core Policy CP14 (High Quality Sustainable Development) Delivery Policy ES4 (Water Resources, Quality and Flood Risk)	
Gloucestershire County Council	Archaeology: Whether there will need to be further assessment or evaluation of below ground archaeology should be determined in accordance with the NPPF once any proposals for new development have been put forward.	Welcome support.
	Ecology: We note that ecological surveys being carried out to inform the Concept Statement are not yet complete. The final version should briefly include the results of this ongoing	Recommendation: Add to Ecology section (page 9):
	work as appropriately but crucially include an additional sentence or two on how biodiversity could be conserved and enhanced thorough seeking new development on the land. There is brief mention of this (e.g. under Green Infrastructure) but such sentiments also needs to be placed within the ecology section such as on page 25. Emphasis to just mitigation on pages 9, 24 and 25 is unacceptable and not consistent with the more positive references related to landscape matters on pages 8 and 16. Retaining sufficient linked up habitat across the site will be important as will taking account of issues such as the installation of lighting which could disturb bats that have been recorded on site.	"Proposals should seek to conserve and enhance local ecology by, for example, retaining trees wherever possible, linking up habitat across the site and utilising drainage systems to facilitate biodiversity enhancement."
	We would recommended on page 23 that one item for the potential EIA is renamed from 'Biodiversity survey and report' to either 'Biodiversity Appraisal' or 'Ecological Impact Assessment Report'.	Change 'Biodiversity survey and report' to 'Ecological Impact Assessment Report (page 23)
	The installation of a sustainable drainage system would be welcomed as it could achieve some biodiversity gain. Strangely there is no direct mention of them which should	Add to Foul Drainage section (page10): Alternative options, such as a wetland ecosystem

	be rectified. The management of all water needs looking at carefully such as to see whether a more ambitious wetland ecosystem treatment 'WET system' for dealing with foul water could be appropriate. It is worth highlighting this to potential developers this potential approach as it can incorporate a wide range of environmental benefits including the provision of green infrastructure and biodiversity enhancement. It is therefore recommended that options under 'Foul Drainage' on page 10 are expanded in the Concept Statement.	treatment approach ("WET system") should be investigated.
Mrs N Ginn	An appropriate marketing period of not less than one year should be placed on the HCA to try to find a single investor. It has already been proved that this site can be brought back into beneficial re-use without the need for enabling development.	The need for an adequate period of marketing needs to be balanced with the need to secure the future of the site as soon as possible. A period of a year is not considered reasonable.
	The ecology sensitivity of the site and the amount of further work required is severely understated in the concept statement. The 'developable' areas – even with mitigation are not correct. The bat related information is still woefully inaccurate.	It is agreed that further wording to require any proposals to conserve and enhance ecology on site is required. The document makes clear that further survey work is underway and any planning application will be required to submit accurate biodiversity survey and report (see page 23).
	The classification and status of the lane to the north will not be suitable for any vehicular access even emergency services vehicles.	This matter will require further transport investigation. It is not appropriate to rule out this option at this stage.
	English Heritage guidance on enabling development is that residential housing should be considered as a mechanism of "last resort" in order to fund the restoration of the listed buildings and their setting – this point has not been made strongly enough in the concept statement.	The document sets out a process by which enabling development will be considered after the preferred approach has been thoroughly investigated. The document also requires developers to consider the English Heritage document thoroughly during the development of a proposal (see Enabling Development section, page 14)

The EBD process was not conducted properly nor in line with the guidance for this process from the Prince's Trust. Members of the public were excluded at critical points in the process. Consensus was not achieved at the EBD with the community. They chose to completely ignore the county house hotel concept proposed by the local community. The only matters in which agreement was achieved and which are shown in the planning concept statement are the proposals for the public footpath and bridleway network and the Public Open Space and extension of the historic orchard.

It is public knowledge that the NHS have decided to relocate this facility and vacate the Westridge site. Given its lesser impact on the main house, listed stables, garden and landscaped parkland setting, any enabling development that may ultimately be required is more sensibly located in this site rather that than the 'inner sanctum' and will reduce the impact on the listed buildings and their setting. It cannot be omitted from the planning concept statement and it will be deficient as a supplementary planning document if adopted with properly incorporating the two sites together and consider the site as a whole.

The community concerns are acknowledged.

Recommendation:

Delete "A series of design and placemaking parameters were agreed (see figure 8) along with identified developable areas of the site (see Figure 14). (Page 18)

Add "However, consensus was not achieved over the form of any redevelopment proposals. The community has developed a separate Community Development Scenario."

The owners of this site have declined to be involved in this process. The site has not been subject to evidence gathering or appropriate consultation for it to be included within this document.

Homes and Communities Agency

We suggest that the Concept Statement should fully recognise the brownfield nature of the site and assess any future proposals against its definition as a residential windfall site.

We contend that proposals should not need to demonstrate that enabling development is required. It is our view that proposals should deliver a viable quantum of housing that allows conversion of the listed buildings and is also The site is not an appropriate location for residential development, as set out in Local Plan policy. The site has not been promoted through the emerging Plan for residential development and cannot be done so at this late stage.

This is a requirement arising from local policy and English Heritage guidance. A two stage process has already been agreed with the HCA and the Council expects the HCA to respect the two stage marketing process and to implement it

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	appropriate to the developable area, and key constraints, of this brownfield site. We recommend that the wording of 'The Process' is reconsidered to indicate only one development strategy.	fully.
	Furthermore, due to the existing site constraints, we believe that viability is fundamental to the delivery of the Standish House redevelopment. The requirement for a viability assessment should therefore be highlighted throughout the document.	It is agreed that viability is a key consideration and this is reflected throughout the document.
	Any redevelopment of the Westridge site should be informed by the same policy requirements as Standish House, including the Concept Statement.	The site is subject to the same Local Plan policy as the Standish House site. The Council understands that the HCA tried to engage with the owners of Westridge prior to the Enquiry by Design process but the owners declined. The site has not been subject to evidence gathering or appropriate consultation for it to be included within this document. Recommendation: No change
Standish Parish Council	We strongly support the proposal to market the site for private purchase.	Welcome support.
	We welcome the clarity about Enabling Development.	Welcome support.
	We want to make it very clear that the Masterplan, developed at the EbD event, was not supported by the community.	The community concerns are acknowledged and additional wording is proposed to clarify this.
	We accept that some enabling development may be necessary in order to bring the site back into use. However, we propose that 4 areas should be removed from the	The areas reflect the general location of previous development. It will be for specific proposals to demonstrate how they will address potential heritage, landscape, ecology
	Planning Concept Statement:	and amenity impacts.

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The preservation of the core listed assets; those named in the Historic England listing; must be the focus of any development of the site. Further development to restore 'curtilage listed buildings' should only be countenanced if funding can be achieved without constructing additional or extending existing buildings. These views are noted. The local planning authority will need to balance the benefits of restoring curtilage listed buildings against any adverse impacts arising from enabling development.

While new or extended buildings may be required in future planning applications, they must be done in such a way as to be invisible from any point at or adjacent to the listed buildings and any point within the Area of Outstanding Natural Beauty (AONB).

This is contrary to Local Plan policy. Development can often conserve or enhance heritage assets or the landscape. Proposals need to be assessed having regard to national and Local Plan policy.

There no demonstrable need for affordable housing within the parish and it would neither be in keeping with the site's heritage, nor reflect the needs for the siting of affordable housing in relation to local amenities. There is significant affordable housing need within the District. It is Local Plan policy to seek mixed and balanced communities in any new residential development. It is not understood why affordable, as opposed to other forms of housing, is not in keeping with the site's heritage.

The opportunities mapping of the site identifies the 'car park' as suitable for development. This is not supportable as the site is widely visible from the surroundings.

The document states that new build development <u>may</u> be acceptable in these areas, subject to detailed design considerations. It will be for a specific proposal to justify that it is appropriate.

The Walled Garden is an important part of the immediate setting for the House, and so development within the Garden should be discouraged.

This is noted.

The 'North entrance' is not suitable for emergency access due to the long and narrow access road.

This matter will require further transport investigation. It is not appropriate to rule out this option at this stage.

Biodiversity and ecology considerations are not given

It is accepted that further additional wording relating to

	enough consideration in the document.	conserving and enhancing ecology is required. (See GCC response).
	The document does not take the needs of the AONB into account.	It is accepted that further additional wording relating to conserving and enhancing the AONB is required. (See Cotswold Conservation Board response).
S.M. Evans	The hospital site would be better developed in conjunction with the adjacent Westridge site.	The owners of this site have declined to be involved in this process. The site has not been subject to evidence gathering or appropriate consultation for it to be included within this document.
	Public access was greatly over emphasised at the EbD event.	Public access has been supported as an aspiration.
	Members of the public were excluded at critical points in the process. Consensus was not achieved at the EBD with the community.	The community concerns are acknowledged and additional wording is proposed to clarify this.
	Three months marketing is not enough.	The need for an adequate period of marketing needs to be balanced with the need to secure the future of the site as soon as possible.
	The areas marked red cause concern. They are too close to the house and do not recognise some of the ecological issues. They are too close to Fieldend House and Roadway Farm. The noise aspects of developing so close are a concern.	The areas reflect the general location of previous development. It will be for specific proposals to demonstrate how they will address potential heritage, landscape, ecology and amenity impacts.
M.C. Scott	The hospital site would be better developed in conjunction with the adjacent Westridge site.	The owners of this site have declined to be involved in this process. The site has not been subject to evidence gathering or appropriate consultation for it to be included within this document.

Public access was greatly over emphasised at the EbD event. Public access has been supported as an aspiration. Members of the public were excluded at critical points in the The community concerns are acknowledged and additional process. Consensus was not achieved at the EBD with the wording is proposed to clarify this. community. Three months marketing is not enough. The need for an adequate period of marketing needs to be balanced with the need to secure the future of the site as soon as possible. The areas marked red cause concern. They are too close to The areas reflect the general location of previous the house and do not recognise some of the ecological development. It will be for specific proposals to demonstrate issues. They are too close to Fieldend House and Roadway how they will address potential heritage, landscape, ecology Farm. The noise aspects of developing so close are a and amenity impacts. concern.