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17 February 2014

Mr Darryl Rogers
Stroud District Council
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Dear Mr Rogers

**Planning Application S.13/2678/OUT - Land south of Leonard Stanley
Primary School, Bath Road, Leonard Stanley.**

We write in connection with the above-mentioned outline planning application for the building of up to 150 residential units with associated infrastructure and access.

We strongly object to this application for the reasons set out in the attached submission and trust that the Council will refuse to grant planning permission in this case.

Yours sincerely

G M Murray

Geoffrey M Murray
Chairman, CPRE Stroud District

STROUD DISTRICT

Chairman
Geoffrey M Murray

The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

Reg Charity No. 248577

Planning application S.13/2678/OUT
Land south of Leonard Stanley Primary School, Bath Road, Leonard Stanley

SUBMISSION BY THE
CAMPAIGN TO PROTECT RURAL ENGLAND (CPRE), STROUD DISTRICT

1. The Site

1.1 The application site comprises 8.19 hectares of agricultural land of Grade 3 status, known locally as Mankley Field, and is located next to the Primary School in Bath Road within the parish of Leonard Stanley.

1.2 The proposed access to the site is from (1) the main traffic route through the village, namely Bath Road, at the front of the site and (2) Marsh Lane which is a narrow country lane at the rear of the site.

1.3 The site is close to the Cotswolds Area of Outstanding Natural Beauty and is outside the settlement boundary of Leonard Stanley.

1.4 The site is a major open field within the rural village. Leonard Stanley and its neighbouring parish, King's Stanley, are totally detached from the Stroud urban area.

1.5 There are three rights of way across the field providing public footpaths in a triangular shape.

1.6 Selsley Common is a short distance away to the east and is designated as a Site of Special Scientific Interest and a Regionally Important Geological Site. To the south east there are Penn Woods and Stanley Woods. All these superb natural features are within the Cotswolds AONB with the Cotswold Way passing through.

2. Planning history

2.1 The site was not included as a potential development site within the current Stroud District Local Plan adopted by the District Council in November 2005.

2.2 At the public inquiry before the adoption of the 2005 Local Plan an attempt was made to gain support for a development of about 235 houses on the site - Omission Site OS116. The Inspector rejected the proposal for the reasons summarised in Appendix 2. There was a clear message that a development of over 40 units was inappropriate in this location.

2.3 In the latter half of the last century there were three planning applications for major residential development on the application site, one in 1961, and two since planning permission was granted in 1968 for the Primary School in Bath Road, these being in 1981 and 1989. Brief particulars of the three applications are included in Appendix 2. The Local Planning Authority (first the County Council and more recently the District Council) has been consistent in protecting this open field from development over the past 50 years or so. Likewise the applicant's previous application last year (S.13/1289/OUT) was also refused and is subject to appeal. Further details of the four applications are given in Appendix 2.

3. The Application

3.1 The application by Gladman Developments Ltd of Cheshire seeks outline planning permission for the following development on the Mankley Field site:

- up to 150 dwellings - 5.40 hectares;
- public open space - 1.18 hectares;

- habitat and buffer landscape - 1.50 hectares;
- ponds - 0.07 hectares;
- play space - 0.04 hectares;
- total of the above areas - 8.19 hectares;
- new rights of way; and
- highways and associated infrastructure works including two access roads.

3.2 There is an intention expressed to provide 30% of the units as affordable housing which is the normal requirement for large development sites in the District.

3.3 In consequence of it being an outline application, detailed designs of the houses and other reserved matters would be subject to examination by the Council at a later stage, in the event that outline permission was to be granted. Therefore we have not considered the quality or appropriateness of the housing design or layout which are not matters for consideration at this stage.

3.4 However, the limitation of this outline application does not in any way affect our views in principle to this development proposal and its likely severe and unacceptable impact on the environment.

4. Development Plan

4.1 The development plan for this application is the Stroud District Local Plan (November 2005 - saved policies). The following policies are relevant to the application:

- GE5 Permission will not be granted for any development that would be detrimental to highway safety.
- HN10 Outside the defined settlement development boundaries, residential development will not be permitted unless it is essential to the efficient operation of agriculture or forestry.
- NE5 It is important that the function of any wildlife corridor should not be harmed.
- NE6 Important natural features such as trees, hedges, shrubs should be retained and managed to conserve and enhance biodiversity.
- NE8 Within the Cotswolds AONB, priority will be given to the conservation and enhancement of the natural beauty of the landscapes over other considerations whilst also having regard to the economic and social well-being of the AONB. Development within, or affecting the setting of the AONB will only be permitted if all the following criteria are met (there are three criteria). Major development will not be permitted unless it is demonstrated to be in the national interest and that there is a lack of alternative sites.
- NE10 Development proposals should conserve or enhance the special features and diversity of the different landscape types found within the District as identified in the Stroud District Landscape Assessments.
- TR1 Transport requirements which must be met for all developments.

4.2 The applicant's Design and Access Statement Part 1 includes references to Local Plan policies BE1 and BE2 with regard to the physical and design requirements for new developments. However both of these policies were deleted (amongst others) by Direction of the Secretary of State on 13 October 2008 and therefore no longer apply. In any case these are, in the main, issues which relate to the reserved matters.

4.3 The emerging Local Plan (up to 2031) was submitted to the Planning Inspectorate on 18 December 2013 for an Examination in Public later this year. The draft Plan therefore now carries some weight and is relevant in the following respects:

CP2 Strategic growth and development locations; Leonard Stanley is not put forward as a

strategic housing location.

CP3 Settlement Hierarchy; Leonard Stanley is within the Third Tier of villages which 'possess limited level of facilities and services that, together with improved local employment, provide the best opportunities outside the Local Service Centres for greater self containment. They will provide for lesser levels of development in order to safeguard their role and to provide through any Neighbourhood Plans some opportunities for growth and to deliver affordable housing.'

CP7 Lifetime communities; This states that developers will need to clearly demonstrate how major housing development will contribute to meeting identified long term needs in the community, which relate to aging community; children, young people and families; people with special needs; and specific identified needs of minority groups in the District.

CP8 New housing development; This includes requirements regarding density, accessibility by bus, bicycle and foot for shopping and employment opportunities and other facilities; layout and access as appropriate; provision of infrastructure and biodiversity.

CP15 A Quality Living and Working Countryside; Proposals outside settlement development limits will not be permitted except in certain circumstances including where it is essential for a farming or forestry enterprise; or it does not lead to excessive encroachment away from the original buildings.

ES3 Maintaining Quality of Life within our Environmental Limits: This refers to unacceptable levels of noise, increased risk of flooding and detrimental impact on highway safety.

ES7 Landscape Character; Within the Cotswolds AONB, or on land that may affect its setting, priority will be given to the conservation and enhancement of the natural and scenic beauty of the landscape whilst taking account of the biodiversity interest and the historic and cultural heritage. Major development will not be permitted unless it is demonstrated to be in the national interest and that there is a lack of alternative sustainable development sites.

ES8 Trees, hedgerows and woodlands; Developments should seek to enhance and expand the District's tree and woodland resource.

ES13 Protection of existing open space; Development shall not involve the whole or partial loss of open space within settlements, or of outdoor recreation facilities, playing fields or allotments within or relating to settlements. These provisions are subject to a robust assessment and replacement facility or enhancement. There should be no harm to spaces which contribute to the distinctive form, character and setting of the settlement.

4.4 The National Planning Policy Framework (NPPF), adopted on 27 March 2012, is a material consideration in accordance with paragraph 196, which also states that applications for planning permission must be determined in accordance with the development plan unless material considerations determine otherwise.

4.5 In paragraph 215 it states that after the initial period of 12 months (from 27 March 2012) due weight should be given to policies in Local Plans according to the degree of consistency with the NPPF, the closer the plan policies the greater the weight. There is a great deal of consistency between the current and emerging Local Plans and the NPPF on matters relating to, inter alia, the protection of the natural environment as will be seen in paragraph 6 below.

4.6 In addition to the current and emerging Local Plans and the NPPF, consideration should be given to:

- the Cotswolds AONB Management Plan (2013-2018) adopted by the Cotswolds

- Conservation Board; and
- the Position Statement on Development in the setting of the Cotswolds AONB issued by the Cotswolds Conservation Board

which are material considerations in regard to this application.

4.7 The South West Regional Spatial Strategy and the Gloucestershire Structure Plan (2nd Review) were revoked by the Secretary of State with effect from 20 May 2013 and therefore are no longer matters for consideration.

5. Residential development

5.1 The site is outside the settlement boundary of Leonard Stanley which defines the area outside which development is generally restricted to the purposes of agriculture or forestry, in accordance with Local Plan policy HN10. The application is clearly contrary to this policy and is one of the reasons for refusal of the applicant's previous application and continues to apply.

5.2 We note that the settlement boundary concerned remains unchanged in the emerging Local Plan following a comprehensive consultation with parish and town councils across the District.

5.3 The size of this development is disproportionate to such a small rural village as Leonard Stanley as expressed by the Inspector in 2004 (see paragraph 2.2 above and Appendix 2).

6. Landscape Impact



6.1 The photograph above shows the view from Dozule Close across the site to the farmland of the Cotswold escarpment beyond. A view which would be no longer available across the AONB if the development went ahead.

6.2 The site is within the setting of the Cotswolds Area of Outstanding Natural Beauty which lies to the east and south of the site.

6.3 We attach as Appendix 1 a Report by Dr Val Kirby which gives a qualified landscape architect's assessment of the impact of the proposed development on the designated AONB landscape. She considers that the proposal would visually merge the two villages which would be undesirable both for residents and for people viewing the villages from the Cotswold

escarpment, and reaches the conclusion that the proposed development would be completely out of scale with its village and landscape setting.

6.4 The Cotswolds Conservation Board is tasked by the Government to conserve and enhance the range of landscapes within the Cotswolds AONB and within its setting. The Board has adopted a Management Plan for the period 2013 - 2018 which includes the following policies:

LTP1: The key characteristics, principal elements, and special qualities (including tranquillity) which form the natural beauty of the Cotswolds landscape are conserved and where possible enhanced.

LTP2: Development proposals and changes in land use and management, both within and outside the AONB, take account of guidance and advice published by the Board.

HEP1: The historic environment and cultural heritage of the AONB is conserved, managed and recorded.

6.5 The Board's Position Statement on 'Development in the setting of the Cotswolds AONB' in paragraph 3 *'provides guidance to local planning authorities, landowners and other interested parties regarding the consideration of the impact of the development and land management proposals which lie outside the AONB but within its "setting".'*

In paragraph 11, the Statement explains that *'The setting of the AONB does not have a geographical border. The location, scale, materials, or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB. A very large development may have an impact even if some considerable distance from the AONB boundary'.*

Paragraph 12 states *'Examples of adverse impacts will include:*

- Blocking or interference of views out of the AONB particularly from public viewpoints*
- Blocking or interference of views of the AONB from public viewpoints outside the AONB*
- Loss of tranquillity through the introduction of lighting, noise, or traffic movement*
- Introduction of abrupt change of landscape character*
- Loss of biodiversity, particularly if of species of importance in the AONB*
- Loss of features of historic interest, particularly if these are contiguous with the AONB*
- Reduction of public access*
- Increase in air or water pollution'*

Paragraph 13 goes on to say *'Adverse impacts might not be visual. The special qualities of the Cotswolds AONB include tranquillity. A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB'.*

6.6 Natural England responded to the application and directed the District Council to the Cotswolds Conservation Board. The Board submitted an objection to the application (which is effectively also representing Natural England) which states that the Landscape and Visual Impact Assessment includes a number of viewpoints (1,2,7,9 and 15 on figure 4) from where clear views of the escarpment are currently available from public viewpoints and despite the retention of a "green corridor" through the site, views of the escarpment from these viewpoints will be lost. It goes on to say that views of the escarpment provide a significant appreciation of the scenic beauty of the Cotswolds AONB and that interference with such views does not conserve the scenic beauty of the AONB, contrary to the great weight required to be given to this issue in accordance with paragraph 115 of the NPPF.

6.7 The Cotswold Way runs along the Cotswold escarpment nearby and is a renowned

walking facility of national importance and contributes to the enjoyment of the AONB and the economic well being of the local communities along its route.

6.8 The 2005 Local Plan policies protect important landscape features (NE6), gives priority to the conservation and enhancement of the natural beauty, within the AONB, of the natural landscape over other considerations (NE8) and conserve or enhance the special features and diversity of the different landscape types within the District (NE10).

6.9 The emerging Local Plan also includes policies to protect the landscape, namely ES7 (landscape character), ES8 (trees, hedgerows and woodland) and ES13 (open space).

6.10 We also believe that the impact on Marsh Lane from the proposed site access, road widening and resulting traffic volume would change the rural character of this quiet country lane.

6.11 The AONB designation confirms the national significance of the Cotswolds landscape. The NPPF states that:

- the planning system should contribute to and enhance the natural and local environment (paragraph 109). The effect of the proposal would be quite the contrary with the destruction of this major greenfield within the village.
- great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty (paragraph 115).
- planning applications should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest (paragraph 116). As there is no definition of 'public interest' in the glossary to the NPPF it surely relates to local community interest, from which there is considerable opposition, including both parish councils.

6.12 We therefore conclude that the protection of the landscape and scenic beauty of the application site within the development plan is still very strong in the 2005 Local Plan and the emerging Local Plan, also in the NPPF and the Management Plan and Position Statement on the setting of the AONB of the Cotswolds Conservation Board. Hence we believe the rejection of the Omission Site proposal in 2004 has been justified by development of other more suitable sites within the Stanleys. The protection of the Mankley Field site, as also evidenced by the refusal of planning permission in 1961, 1981, 1989 and 2013, should be continued.

7. Transport and Road Safety

7.1 The road structure of the village with its narrow lanes was not designed for the demands of the 21st century with a high proportion of car users. The addition to up to perhaps 300 more cars with access on to Bath Road and Marsh Lane will put an unacceptable strain on the road network of Bath Road and the narrow country lane of Marsh Lane.

7.2 The impact on the road system is one reason why major developments are directed in the current Local Plan and the emerging Local Plan into urban areas where the necessary infrastructure is already in place or can be more easily provided.

7.3 The purpose of Local Plan policy GE5 is to minimise development which is detrimental to highway safety which, with 150 units, it is unlikely to achieve as there is considerable doubt about the viability of the infrastructure changes needed for both access points. This policy is continued in the emerging Local Plan in Policy ES3 with regard to detrimental impact on highway safety.

7.4 For the same reason of traffic volume, it would be a serious challenge to comply with policy TR1 with regard to highway improvements particularly with reference to Marsh Lane.

7.5 We note that the Highways Authority has withdrawn its concerns and is not objecting to the application.

7.6 There is a road planned to go across the site between the two access points. Our concern is that (i) an assumption that an equal amount of traffic would use each access point, particularly at peak times may not be realistic; and (ii) the volume of traffic from this 'dormitory' village with few employment opportunities could be underestimated within a standard formula. It seems conceivable that a larger proportion of vehicles may exit/enter via Bath Road and that the ratio of vehicle movements to housing build could be greater than assumed. We are not aware that an assessment has been made to determine the maximum number of houses that could be served by each access. We believe that an independent assessment of the likely highway impact and safety issues should be undertaken before any decision is taken on highway safety grounds..

8. Sustainable development

8.1 The National Planning Policy Framework (NPPF) states in paragraph 6 that the purpose of the planning system is to contribute to the achievement of sustainable development and policies in paragraphs 18 to 219 set out the Government's view of what sustainable development means in practice for the planning system. The term is not defined in the NPPF's glossary but paragraph 7 says there are three dimensions to sustainable development - economic, social and environmental roles:

Economic - contributing to a strong, responsive and competitive economy. It should be noted that the glossary in defining economic development specifically excludes house building so the application is not contributing to the economic needs apart from income to a few small businesses in the Stanleys. There will therefore be limited employment opportunities in the villages arising from the proposed development.

Social - includes the supply of housing but clearly states the need for accessible local services that reflect the communities needs and support its health, social and cultural well-being. The inclusion of affordable housing would make a contribution to the requirement across the District although it is noted that an 'exception' site of 20 units was built last year in nearby Middleyard. The application includes a play space but does not seem to add any other significant contribution to community facilities. The dog walkers would lose the footpaths across the open field; any replacement would have a much less attractive view across or between a housing estate.

Environmental - contributing to and protecting and enhancing our natural, built and historic environment and to improve biodiversity. The effect of such a large development would be quite the reverse in so far as it would materially damage the natural landscape of this large greenfield site which cannot be compensated by the green strip across the site and the play space.

8.2 Paragraph 8 of the NPPF goes on to say that to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously which, as stated in the previous paragraph, is not possible in this case.

8.3 According to paragraph 9 of the NPPF, pursuing sustainable development involves seeking positive improvements to the quality of the built and natural environment. This housing development on this greenfield site would not improve its surrounding built environment and its natural environment would be irretrievably damaged.

8.4 Paragraph 14 expresses the presumption in favour of sustainable development which means approving development proposals that accord with the development plan; this the application clearly does not - it is inconsistent with policies GE5, HN10, NE5, NE6, NE8, NE10 and TR1 of the Local Plan.

8.5 Further NPPF policies in regard to sustainable development with which the application does not comply relate to:

- take account of the different roles and character of different areas (paragraph 17).
- contribute to conserving and enhancing the natural environment and reducing pollution (paragraph 17).
- reusing land that has previously been developed (paragraph 17).
- make the fullest possible use of public transport, walking and cycling (paragraph 17)
- in rural areas housing should be located where it will enhance or maintain the vitality of rural communities (paragraph 55).
- incompatibility with an existing landscape (paragraph 65).

9. Housing Land Supply (HLS)

9.1 The NPPF (paragraph 47) requires local planning authorities to maintain a 5 years HLS.

9.2 We note that a report from Evans Jones LL.P of 17 October 2013 has provided an independent assessment of the District's HLS which then stood at 5.55 years.

9.3 It is noted that a recent planning appeal, which was allowed, related to housing development for 18 or 19 units on land at Elstub Lane, Cam. The Inspector took the view that the Council 'cannot at this stage demonstrate with sufficient certainty that there is a 5 year housing land supply' but did not determine either a 5% or 20% buffer. It should be noted that Cam is a Principal Settlement within the Stroud Local Plan and therefore a sustainable area for housing development, unlike the village of Leonard Stanley. There was not a landscape issue in this case.

9.5 It is interesting to note that a planning appeal decision in Cheshire East (APP/RO660/A/13/2195201) dated 18 October 2013, considered the refusal of an outline planning application for up to 155 residential units on a site which is in open countryside but NOT a designated landscape. The local planning authority had a housing land supply of around 4 years and had failed to maintain the 5 years supply for the past 5 years in the view of the Inspector who concluded that the 20% buffer should apply. Despite that, the Inspector decided that the appeal be dismissed as he '*was satisfied that the balance lies with the harm to character and appearance of the countryside, and is so significant that it outweighs the lack of housing land supply and other identified benefits*'. Whilst an Inspector will determine each appeal on its own merits it is encouraging that even undesignated landscape areas can be given priority over the need for a 5 years housing land supply. The case for rejection of the Mankley Field site would be surely even stronger with the site being within the setting of the designated AONB.

9.6 The report on the Residential Commitments in Stroud District at 1 April 2013 shows that there were planning permissions granted for 4,304 dwellings across the Stroud District some of which were under construction but others had not then been started; this represents over 10 years of housing supply. There is therefore no shortage of planning permissions. The problem is mainly one of financial considerations for the construction industry and the level of demand in the housing market during these difficult economic times. It is still early days yet to judge whether the economic recovery is going to be sustained in the long term.

9.7 There is therefore no real need for the 150 dwellings now being applied for.

10. Strategic Housing Land Availability Assessment (SHLAA)

10.1 Although the SHLAA identifies sites which have potential for housing development, including the Mankley Field site, it does not take account of planning policies or landscape considerations and does not in itself determine whether a site should be allocated for housing

development.

10.2 We understand that a new and more comprehensive assessment of sites will be undertaken by the Council during this year.

11. Our conclusions

11.1 It is clear that the applicant still relies substantially on the presumption of a lack of a 5 years housing land supply. The applicant has completely disregarded the need for protecting this valuable green wedge, within the setting of the Cotswolds AONB. There would be serious impact on views into the AONB and from the AONB. It would be an intrusive major development out of keeping with the surrounding natural environment. This would be the case regardless of the specific designs and layout of the proposed mass of 150 units. The size of this proposed housing scheme is out of proportion to the needs of the village.

11.2 The application is contrary to the current and emerging Local Plan policies, the NPPF, and the Cotswolds AONB Management Plan and its Position Statement on the setting of the AONB.

11.3 Even though an attempt has been made to show a green strip through the site and to compensate for the loss of landscape features and wildlife, it really is impossible to compensate for the total transformation of the 18 or so hectares of natural agricultural land with new planting of trees/hedgerows and expectations of retaining the wildlife. There is also the uncertainty of an outline application which cannot be relied upon with regard to design and layout. The only certainty would be that there would be 150 (or nearly 150) 2 or 2.5 storey houses and this very important green oasis between the two villages of Leonard Stanley and King's Stanley would be lost for ever.

11.4 We would emphasize that the protection of the AONB is a national policy which is given 'great weight' in the NPPF whilst the housing need is a District requirement. In any case, if considered from a national perspective, the building of even 150 houses is a minute proportion in relation to the national requirement. We would contend that the protection of the AONB and the character of the village overrides any perceived need for the 150 houses in this location. We also consider that it would be impossible to sufficiently and effectively mitigate against the impact of this large development in its setting.

11.5 There is also concern that the case for the site being sustainable and the proposed highway proposals avoiding extreme risks to highway safety are not convincing.

11.6 We therefore maintain our strong objection to this proposed development on the grounds set out above and trust that the Council will again refuse to grant planning permission. We will give our support to defending such a decision at any appeal which may be pursued by the applicant.

CPRE Stroud District
17 February 2014

Proposed housing development at Mankley Field, Leonard Stanley

Landscape report

V G Kirby BA (Hons) Dip TRP Dip LA PhD FLI

Landscape context

Leonard Stanley and King's Stanley sit at the foot of the Cotswold escarpment, just outside the Cotswolds AONB. The best source of advice about their strategic landscape context is to be found in the recently published National Character Area profiles¹.

Natural England's website explains:

NCA profiles are guidance documents which can help communities to inform their decision-making about the places that they live in and care for. The information they contain will support the planning of conservation initiatives at a landscape scale, inform the delivery of Nature Improvement Areas and encourage broader partnership working through Local Nature Partnerships. The profiles will also help to inform choices about how land is managed and can change. Each profile includes a description of the natural and cultural features that shape our landscapes, how the landscape has changed over time, the current key drivers for ongoing change, and a broad analysis of each area's characteristics and ecosystem services. Statements of Environmental Opportunity (SEOs) are suggested, which draw on this integrated information. The SEOs offer guidance on the critical issues, which could help to achieve sustainable growth and a more secure environmental future.

The two villages sit on the eastern edge of the Seven and Avon Vales National Character Area (NCA 106), but the main strategic landscape influence is provided by the Cotswolds (NCA 107) whose boundary in this location coincides with the boundary of the Cotswolds AONB. A key element of this NCA is the westward facing scarp slope, which provides the setting for the major towns in the vale as well as many villages and hamlets, including Leonard and King's Stanley. The importance of the national landscape designation, in terms of the need to conserve both the AONB itself and its setting, is stressed. The first Statement of Environmental Opportunity includes this advice:

Protect and enhance the highly distinctive farmed landscape, retaining the balance between productive arable, pastoral and wooded elements and the open, expansive views particularly from the scarp, high wold and dip slope.

This statement is followed by a series of examples, illustrating what this SEO should mean in practice. The first two of these are highly relevant to the Mankley Field site.

- *Protecting the contrasts in character between scarp, high wold and dip slope by using their defining characteristics to inform new development, woodland creation initiatives and land management, particularly through the use of agri-environment schemes.*
- *Identifying key views into and out of the Cotswolds, particularly along the scarp and main settlements such as Stroud, Bath, Cheltenham and*

¹ See Natural England website

<http://www.naturalengland.org.uk/publications/nca/searchpage.aspx>

Gloucester. Using this to mitigate development in or around these key views, which could otherwise be intrusive and increase disturbance. Where new development is appropriate, ensuring that it is integrated into and informed by the existing high quality and distinctive landscapes, increasing the area and networks of semi-natural habitats and avoiding light pollution in areas below the scarp.

The site-specific analysis that follows should be read with this advice firmly in mind.

The site in its setting

The villages of Leonard Stanley and King's Stanley are adjacent to each other on the gentle, north facing slopes of the Frome Valley, below Penn Hill and Stanley Wood on the Cotswold escarpment. Mankley Field is a key green wedge that separates the two settlements, extending the open country of the adjacent Cotswolds AONB into and between them.

The curve of the Cotswold escarpment encloses both settlements and adds greatly to their sense of place. Although there is broken, linear development all along the foot of the steep ground, the presence of substantial hedgerows in the middle ground and continuous open country beyond creates a strong sense of enclosure and emphasises the outstanding setting.

There are good views of both Leonard and King's Stanley, including Mankley Field, from Selsley Common to the south-east and the Cotswold Way, which runs along the top of the escarpment before dropping down into woodland.

The villages of Leonard Stanley and King's Stanley

In order to make an informed judgement about the appropriateness of new development, it is helpful to look back at the way in which the two villages have changed over time. Both Leonard Stanley and King's Stanley have evolved from ancient origins: Leonard Stanley's church has Saxon origins and both villages were mentioned in the Domesday Book. They are not typical Cotswold 'chocolate box' villages: both their industrial and their agricultural pasts are still clearly visible. Now they are both primarily dormitory villages, with many residents leaving each day to work in the neighbouring towns. The housing stock of both villages is mixed in age, size, materials and design. They are similar in size: Leonard Stanley's website refers to about 600 houses¹. King's Stanley's website refers to nearly 590 houses².

Development over the years has been gradual and small scale: a couple of houses added here, a new road or close there. This kind of organic growth is appropriate to the character and the scale of both villages.

Commentary on the proposed housing development

The proposal to add another 150 houses to Leonard Stanley is simply out of scale with the character of the existing village. Increasing the housing stock by 25% in one development would change the feel of the place from organically growing village to suburb.

¹ See <http://leonardstanley.org.uk>

² See <http://www.kspc.org.uk/default.asp?pid=30>

The proposal would also visually merge the two villages. This would be undesirable both for residents and for people viewing the villages from the Cotswold escarpment. Local people would find their sense of place and identity suddenly eroded. The view from above would present a consolidated suburban block. King's Stanley and Leonard Stanley are typical of many towns and villages on or near to the Cotswold edge, where character and sense of place is strongly influenced by wedges or fingers of farmland that extend into and subdivide developed areas. It is important that these green wedges remain in agricultural use: the character of open land that is farmed is completely different from the character of open land that is suburbanised green strips. These strips would, in any case, be subordinate to the housing, which would still dominate.

Conclusion

The proposed development of Mankley Field for up to 150 houses is completely out of scale with its village and landscape setting. The application should be refused.

Dr Val Kirby

6 February 2014

APPENDIX 2

Planning History

Omission Site OS116 - Land south of Bath Road, Leonard Stanley

Following the public inquiry held in 2002/03 into the draft Local Plan, the Inspector in his report of 24 November 2004 rejected the site next to the school for about 235 dwellings. He considered that,-

5.150.2 *From the evidence it appears that the Council gave no consideration to the possible inclusion of this objection site following the initial reporting of the fact that the Leonard Stanley Parish Council "is opposed to development which would lead to further coalescence of Leonard Stanley and Kings Stanley" I also understand that Kings Stanley Parish Council hold a similar view.*

The Inspector went on to say that he 'did not rule out the site for reason of coalescence' although it should be noted that the Parish Councils concerns related to further coalescence.

5.150.5 He stated that 'I do not accept that they (the Stanleys) should be regarded as part of the Stroud urban area. This site, as I remarked at the beginning of my consideration of this objection, was put forward in part to meet what the Objector saw a need to replace a major allocation elsewhere. As such it needs to be measured against a location such as Hunts Grove which is a much higher level in the search hierarchy and has much greater credentials in being close to high-order facilities and have the potential to be well served by public transport.

5.150.6 *... I agree with the omission of The Piggeries, so that the Council's intentions are for allocations in the Stanleys providing for about 40 units or so. This is about the number of dwellings which I would regard as suitable for the level of settlement*

5.150.8 *In relation to the size of the objection site, there is also the consideration that the site is 'best and most versatile' agricultural land, it being Grade 3a. Thus if there were a need for this size of allocation, it would be appropriate to consider other possible sites which might be of a lower grade.*

Planning applications - 1961, 1981, 1989 and 2013

The following applications relate to the application site or part of it:

S.4551

Application dated 19 January 1961.

Land at Leonard Stanley O.S.Glos. 492 and 49.6. Part Parcel 94.

Application for residential development - maximum density on a site of 10 acres.

Planning permission was refused by the County Council for the following reasons:

(a) *This site forms a part of an open area lying between Leonard Stanley and King's Stanley. The development of this area would eventually result in the coalescence of these two groups of development and result in a sprawl of urban development and the loss of identity of the two villages.*

(b) *The Minister of Agriculture, Fisheries and Food advises that there is objection to the proposed development on agricultural grounds.*

S.4551/M

Application dated 31 March 1981.

Land adjacent to Leonard Stanley, SO 8003 SE.

Outline application for residential development on land formerly agricultural.

Construction of new vehicular access.

Planning permission was refused by the District Council for five reasons including:

(b) *In the opinion of the Local Planning Authority the development proposed is not in accordance with Area Policy H30, General Policies L5 and AG1 and Principal Policies H3, H4 and H5 of the submitted Structure Plan for Gloucestershire.*

(c) *The site forms part of an open area lying between Leonard Stanley and Kings Stanley. The development of this area would eventually result in the coalescence of these villages and result in a sprawl of urban development and the loss of identity of the two villages.*

S.4551/R

Application dated 16 October 1989.

Land adjacent to Bath Road, Leonard Stanley; SO 8003 SE.

Outline application for residential development including dedicated open space on a site of about 5 hectares. Construction of a new vehicular access and pedestrian access.

Planning permission was refused by the District Council for the following reasons:

(a) *The site of the proposed development forms part of an attractive largely undeveloped tract of open land leading from Bath Road towards the escarpment of Cotswold Hills. The site itself and the views obtained over it towards the Cotswold Area of Outstanding Natural Beauty contribute significantly to the character and general amenities of the urban form in this area and at the same time the site provides an appropriate physical break between the two communities of Leonard and King Stanley. In the opinion of the Local Planning Authority the development of the site would have a detrimental effect on the character and quality of the environment and amenities of the locality as described above and, therefore, the proposal is considered unacceptable.*

(b) *In the opinion of the Local Planning Authority the proposed development of this environmentally sensitive site beyond the existing limits of built form is considered unacceptable because it does not reflect the priority that should appropriately be given to meeting the requirement for further residential development from sites within the Stroud Urban Area throughout the period up to 2001, as proposed in Area Policy H28 of the submitted First Review of the Gloucestershire Structure Plan. In the opinion of the Local Planning Authority the inappropriateness of such releases is presently reinforced by the fact that more than sufficient land has been released to meet that requirement for readily available residential land as expressed in Government advice.*

(c) *The grant of planning permission would set a precedent for further development of land adjoining this site to the detriment of the existing rural character of the area.*

Previous application by the applicant

September 2013 - Land south of Leonard Stanley Primary School, Bath Road, Leonard Stanley (S.13/1289/OUT)

Gladman Developments Ltd submitted an outline application for up to 150 residential units with associated infrastructure and access with all other matters reserved; the application was refused for the following reasons>

1. *The development is located outside the defined settlement boundary and is therefore contrary to the requirements of Stroud District Local Plan Policies HN10 and NE8 and paragraph 196 of the NPPF. Policy HN10 seeks to prevent non essential development which would detract from the character and appearance of the countryside, especially the AONB as emphasised by Policy NE8.*
2. *There is no requirement to release this Grade 3a agricultural land for residential development in accordance with paragraph 112 of the National Planning Policy Framework.*
3. *There is potential for prehistoric/roman remains to be present on the site which requires investigation prior to determination of the proposal. With this investigation, it has not been possible to fully assess the implications of the proposal on the interests of archaeology, contrary to paragraph 128 of the NPPF and Policy BE14 of the adopted Stroud District Local Plan, November 2005.*
4. *Insufficient information has been provided in order to fully ascertain whether there would be any impacts on protected species including bats, badgers and reptiles. The Local Planning Authority are unable to make a valid judgement as to the acceptability or otherwise of the proposed mitigation or enhancement measures, contrary to Policy NE4 of the adopted Stroud District Local Plan, November 2005 and paragraphs 118 and 119 of the NPPF.*
5. *Insufficient information has been provided to satisfy the Local Planning Authority that the residual cumulative severe impact of the development at the Marsh Road/Church Lane junction can be adequately mitigated, contrary to Policy GE5 of the adopted Stroud District Local Plan, November 2005.*

The refusal has been appealed and is currently pending a Planning Inquiry to be held in April 2014.