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2 April 2014

Case Officer: Leanne Palmer  
The Planning Inspectorate  
Room 3/02  
Temple Quay House  
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Temple Quay  
Bristol BS1 8PN

Dear Ms Palmer

**Planning Appeal APP/C1625/A/14/2213711 - Land off Summer Street,  
Stroud, Gloucestershire**

We write in connection with the above-mentioned planning appeal for the building of approximately 112 dwellings and various other works including the demolition of existing farm buildings on land at Summer Street, Stroud.

We submitted our views on this application to the Stroud District Council on 23 January 2014. However we have revised our submission - see attached - and would be grateful if the Inspector would take account of this revised version instead of our letter of 23 January.

As indicated at the pre-inquiry meeting on 25 February, our landscape architect, Dr Val Kirby, and the undersigned will be available to give evidence during the second week of the Inquiry.

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 Appeal APP/C1625/A/14/2213711**  
**Outline planning application S.13/2451/OUT**  
**Land off Summer Street, Stroud, Gloucestershire**

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

**1. The Site**

1.1 The appeal site comprises 15.00 hectares of agricultural land located below the north west sloping side of Summer Street, Stroud and is proposed for a housing development with ancillary works.

1.2 The site is within the setting of the Cotswolds Area of Outstanding Natural Beauty being at the south west end of the Slad Valley; it is outside the settlement boundary of the Stroud Urban Area. Close by there are a number of listed buildings and the Top of Town Conservation Area.

1.3 There is a public footpath along the southern edge of the site.

1.4 There is currently no vehicle access to the site and Stroud town centre is a walk of about a mile away from the centre of the development site. There are very limited shopping facilities within easy reach but there is a local primary school. Otherwise there is a lack of community services and facilities in the immediately accessible surrounding area.

**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 Local Plan an attempt was made to add a 3.5 hectares site off Slad Road (omission site OS123) to the allocated sites for residential development. That site, like the application site, lies outside the Stroud Urban Area, within the Slad Valley close to Slad Brook and within the setting of the Cotswolds AONB. The Inspector considered that,-

- the greenfield site does not perform better on sustainability grounds than the proposed allocations for Stroud in the Revised Deposit Plan;
- the proposed development would completely alter this part of Stroud, which is prominent from a large part of the surrounding urban area;
- the omission site is open and rural in character and relates physically and visually to the countryside, forming part of the green wedge and setting of Stroud. The release of the site for housing would represent an intrusion of development into the open countryside, harming the green wedge and eroding it; and
- the development that abuts the site is not intrusive development.

Although the omission site is located across the valley from Summer Street, the planning issues are equally relevant to the application site as are the Inspector's views referred to above.

2.3 Between 1967 and 1995 four attempts were made to obtain planning permission

for major housing development on the site all of which were refused by the local planning authority. Further details of the four applications are given in Appendix 2.

2.4 The applicant's previous application for up to 140 houses (S.13/0166/OUT) which was refused, is a linked appeal and is referenced in Appendix 2.

### **3. The Application**

3.1 The application by Gladman Developments Ltd of Cheshire seeks only outline permission for the development of approximately 112 residential units with parking for 224 cars on around 4 ha, the construction of an access road from the site up to Summer Street, the allocation of land for a community/country park, an open space and children's play area and the demolition of three buildings. There is an intention expressed to provide 30% affordable housing which meets the normal requirement for major development in accordance with the Local Plan.

3.2 Other issues such as layout and design of the houses are reserved matters for whoever were to take on the development if planning permission was ever granted. However, the limitation of this outline application does not in any way affect our views in principle to these development proposals.

3.3 We note that whilst the planning application refers to approximately 112 units, the Landscape and Visual Assessment, Ecological Appraisal and Planning Statement refer to up to 112 dwellings; we therefore presume 112 units to be the maximum as it is not practical to have an undefined building limit.

### **4. Development Plan**

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

- 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.
- BE5 Development affecting Conservation Areas.
- BE12 Development affecting the setting of a Listed Building.
- NE6 Important natural features such as trees, hedges, shrubs should be retained and managed.
- 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.
- 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 National Planning Policy Framework (NPPF) adopted in 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.

4.3 In paragraphs 214 and 215 it states that for 12 months from its publication full weight should be given to policies adopted since 2004 and following the 12 months due weight should be given to such policies 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 NPPF and the Local Plan on matters relating to, inter alia, the protection of the natural environment and heritage assets.

4.4 In addition to the Local Plan 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.

4.5 The site is not identified as a strategic housing site within the emerging Local Plan (up to 2031). The public consultation on the pre-submission draft was completed on 16 October 2013 and the draft Plan was submitted on 18 December 2013 to the Planning Inspectorate for an Examination in Public which commenced on 1 April 2014. Therefore some weight can be given to this Plan which continues to aim to protect the natural environment (policy ES6), the Cotswolds AONB and its setting (policy ES7), trees, hedgerows and woodlands (policy ES8) and heritage assets and their settings (policy CP15) .

4.6 The national Planning Practice Guidance issued on 6 March 2014 states in paragraph 003 of the Landscape section that the duty of protection of AONBs is relevant in considering development proposals that are situated outside AONB boundaries but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas. The protection of the setting of the Cotswolds AONB within the current Local Plan and the emerging Local Plan is therefore supported by national policy.

## **5. Key Issues**

5.1 It appears to us that the key issues which are relevant to this appeal relate to:

- the location of the site outside the settlement boundary;
- landscape impact from such a development proposal including impact on listed buildings and Conservation Area;
- the availability of a 5 years housing land supply (HLS) within the Stroud District; and
- the sustainability or otherwise, of a housing development on the site.

5.2 We feel strongly that even in the event that the HLS requirement is not fully met the issue of the supply of housing is outweighed in this case by the overriding importance of the protection of this stunning landscape. The lack of sustainability of this development would also be another sound reason to balance against the housing gain.

5.3 There are other relevant issues which we refer to in paragraph 10 below.

## 6. Residential development

6.1 The site is outside the settlement boundary of the Stroud urban area 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 contrary to this policy and is one of the reasons for refusal of the applicant's previous application and continues to apply.

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

## 7. Landscape Impact

7.1 The development would be close to the Cotswolds Area of Outstanding Natural Beauty which extends to the foot of the Slad Valley. The photograph below is taken from Summer Street and shows the view across the site to the Slad Valley.



7.2 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 and reaches the conclusion that the application should be rejected on landscape grounds. The site is not suitable for development because of its position in the setting of a nationally important landscape.

7.3.1 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's Management Plan (2013-2018) includes the following policies:

*LTP1: The key characteristics, principal elements, and special qualities (including tranquillity) which*

*form the natural beauty of the Cotswold 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.*

7.3.2 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".'*

7.3.3 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'.*

7.3.4 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'*

7.3.5 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'.*

7.4 The 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 and limits development within the setting (NE8) and to conserve or enhance the special features and diversity of the different landscape types within the District (NE10).

7.5 The Core planning principles of the NPPF (paragraph 7) includes:

- take account of the different roles and character of different areas and recognising the intrinsic character and beauty of the countryside;
- contribute to conserving and enhancing the natural environment and reducing pollution;
- reusing land that has previously been developed (brownfield); and
- conserve heritage assets in a manner appropriate to their significance.

7.6 In addition, the NPPF at paragraphs 109 and 115 aims to contribute to and enhance the natural and local environment and gives great weight to conserving landscape and scenic beauty in AONBs. The landscape impact may be in relation to views from the AONB into the surrounding landscape and from the setting of the AONB into the AONB. Paragraph 116 states that major developments in designated areas should be refused except in exceptional circumstances and demonstrated to be in the public

interest, which would not apply in this case in the absence of the essential need for this development

7.7 Paragraph 123 of the NPPF sets out the aim of planning policies and decisions to avoid noise from giving rise to significant adverse impact on health and quality of life as a result of new development. The proposed housing estate would clearly have a significant adverse impact on this peaceful greenfield site at the foot of the Slad Valley.

7.8 Other landscape aspects relate to the impact of the proposed development on the landscape surrounding listing buildings and the Conservation Area, and the impact of the proposed new access road on to Summer Street.

7.9 The site forms the setting for a number of cottages along Summer Street which are Grade II listed buildings and are nationally important and of special interest. However, of special note is the Grade II\* listed Slade House (and its former stables and outbuildings listed Grade II) with its country house setting which is a particularly important building of more than special interest; only some 5.5% of listed buildings are classified as Grade II\*. There would also be impact on Hazel Mill, Abbey Farm and Rifleman Cottages from Swifts Hill. The setting of these heritage assets would be adversely affected by the proposed development being transformed from an open rural area to an urban-style developed area, contrary to Local Plan policy BE12 which requires the setting to be preserved.

7.10 The proposed demolition of the three farm buildings would result in the loss of part of the historic built environment near to the listed Slade House. Whilst it may improve close views towards the proposed tree line boundary there would still be unsatisfactory longer views of the proposed housing development instead of across open countryside.

7.11 It should be noted that the NPPF in paragraph 65 states, in effect, that applications should be refused if material harm would be caused to a designated heritage asset or its setting which would not be outweighed by the proposal's economic, social or environmental benefits. We note that the definition of economic development in the glossary of the NPPF excludes housing development. We therefore believe that there would be limited economic benefits to local businesses, the social benefits would be minimal (in view of the unsustainability of the development) and there would be no environmental benefits; in fact the net environmental impact would be negative.

7.12 Paragraph 132 of the NPPF states that when considering impact on a designated heritage asset great weight should be given to the asset's conservation and the more important the asset the greater the weight.

7.13 The NPPF goes on in paragraph 133 to balance between substantial harm to designed heritage assets and substantial public benefits. We have no doubt that in this case the substantial harm is greatest and the four other criteria for set out in the paragraph do not apply. We also contend that even if there is less than substantial harm to heritage assets such harm is still greater than the public benefits of the proposed development, in accordance with paragraph 134 of the NPPF.

7.14 The site is within the setting of the Stroud Top of Town Conservation Area. A Conservation Area is an area of special architectural or historic interest, the character

and appearance of which it is desirable to preserve or enhance. The proposed development would have an unavoidable conflict with the character of the Area, contrary to policy BE5 of the Local Plan as it fails to meet all of the four criteria with regard to:

- the respect for existing open spaces;
- the scale of the proposed development and compatibility with adjacent buildings;
- loss of features of historic or characteristic values; and
- protection of important views within, into and out of the area

7.15 Furthermore the proposal does not meet the requirement of NPPF paragraph 137 in that it would not enhance or better reveal the significance of the Conservation Area or the heritage assets.

7.16 The proposed access road on to Summer Street would not be a simple construction contract in relation to the current land layout but would be a major engineering scheme to produce a gradually inclined road well into the greenfield of the site. This would also add to the landscape impact on the street scene on Summer Street and from the public footpath alongside the site.

7.17 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, the emerging Local Plan and the NPPF. Therefore the protection of this greenfield site from housing development over the past 40+ years should be continued.

7.18 The various landscape issues, including impact on listed buildings and Conservation Area, were amongst the reasons for refusal of both applications.

7.19 We note that the Planning Statement refers to the review of the boundary of the Cotswold AONB instigated by the Countryside Commission in 1985 and completed in 1990. The boundary at the foot of the Slad Valley was not extended into the area of the application site. However this does not affect the protection of the AONB through its setting. Our Landscape Architect in her report (Appendix 1 attached) refers to the views into and out of the AONB and, in short, the proposed development cannot fail to have a major impact on such views.

## **8. Sustainable development**

8.1 The 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. The glossary, in defining economic development, specifically excludes house building so the application is not directly contributing to the economic needs.

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 location of the proposed housing development provides poor accessibility to the town centre where the main shopping facilities and services which the residents would need are located.

Environmental - contributing to and protecting and enhancing our natural, built and historic environment and to improve biodiversity. The effect of the development would be quite the reverse in so far as it would materially damage the natural landscape of the greenfield site at the foot of the Slad Valley not only on the 4 hectares housing estate but by changing the natural state of the fields of the other 11 hectares of the site.

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 Furthermore, paragraph 9 of the NPPF says pursuing sustainable development involves seeking positive improvements in the quality to the built, natural and historic environment. There is no evidence in the application to consider the quality of the new build houses but it seems unlikely they could improve the quality of the built environment along Summer Street and its setting. It would be an isolated housing estate with a rather tenuous link to the town and would not be integrated into the fabric of the built environment. The natural and historic environment would certainly not be improved by the proposal.

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 HN10, BE12, NE6, NE8 and NE10 of the Local Plan.

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

- make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable (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 and impact on heritage asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits (paragraph 65).

## **9. Housing Land Supply (HLS)**

9.1 The NPPF (paragraph 47) requires local planning authorities to maintain a 5 years HLS. We understand that Stroud District Council cannot at this point in time demonstrate a 5 years HLS. This does not mean that it does not exist in full or to a substantial extent.

9.2 It is noted that paragraph 14 of the NPPF states that where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless any adverse impacts of doing so would significantly outweigh the benefits, when assessed against policies in this framework taken as a whole. Specific reference is made to protection of an Area of Outstanding Natural Beauty and designated heritage assets.

Therefore the purpose of the paragraph with regard to granting permission does not apply in this case.

9.3 We also note that 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 District some of which are under construction but others had not been started. This represents over 10 years of housing supply. There is therefore no shortage of planning permissions. The problem is mainly one of finance for the construction industry and housing market during the difficult economic conditions over recent years.

9.4 There is therefore no real need for planning approval for the 112 dwellings on this treasured greenfield land.

## 10. Other Issues

### 10.1 Strategic Housing Land Availability Assessment (SHLAA)

Although the SHLAA identifies sites which have potential for housing development including constraints 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.

The latest SHLAA report (2011) for the Stroud District identifies the application site as one which has constraints, being the access issue. There are many other sites identified on the SHLAA list which are suitable, available and achievable which developers should concentrate on before considering, if ever, the more challenging and undesirable sites for housing such as the application site.

We understand that a new assessment of SHLAA sites will be undertaken by the Council this year and will be more comprehensive on issues considered than hitherto.

### 10.2 Community Park or Country Park

It is noted that the area of the proposed Park is **less** than the 10 hectares minimum for it to be considered for accreditation by Natural England as a Country Park. Such accreditation would require the Park to provide the core facilities and services set out in Natural England's criteria checklist.

The Natural England core facilities and services are precisely what would be needed for a truly Country Park in any area like the site as a whole. However the whole site would be totally ruined by the housing estate between the Park and the gardens of the Summer Street homes. We do not believe that the idea of the Park has been thought through in terms of:

- the definition of community; does this mean just the residents of the new development or the wider general public including tourists? An accredited Country Park would mean the latter.
- the on-site administration and maintenance of the Park in perpetuity. Which body has agreed to undertake these duties? The application leaves the question open.
- facilities for the less able and disabled people including car parking spaces, wide footpaths and benches within the Park.

- safe access links into the Park from surrounding areas.

In view of the lack of clarity with regard to the Park proposal we suggest that it should be disregarded when considering the application as its implementation and management cannot be assured from the limited details given in the application.

## **11. Our conclusions**

11.1 It is clear that the applicant relies substantially on the presumption of a lack of a 5 years housing land supply. The application has a complete disregard to recognising the need for protecting the glorious open countryside of this site which is close to the Cotswolds AONB and immortalised by Laurie Lee in *Cider with Rosie*. The impact is the loss of long views from the site northwards up the Slad Valley and in reverse the adverse effect on views from around the Valley southwards towards what would be an intrusive major development out of keeping with the surrounding natural and built environment. This would be the case regardless of the specific designs of the proposed mass of housing of 112 units.

11.2 The natural environment of the site of 15 hectares pasture land would be totally changed by the proposed housing development, the demolition of buildings and the landscape changes.

11.3 The application is contrary to the Local Plan policies GE5, HN10, BE5, BE12, NE6, NE8, NE10; the NPPF paragraphs 8, 9, 14, 17, 55, 65, 109, 115, 116, 123, 132, and 137; and Cotswolds AONB Management Plan and its Position Statement on the setting of the AONB.

11.4 In short, even though this application is for 28 fewer housing units than the previous application, there would still be an unacceptable impact on this landscape which would generally apply to any major development on this site.

11.5 We therefore strongly object to this development proposal on the grounds set out above and trust that the appeal will be dismissed.

CPRE Stroud District  
2 April 2014

## APPENDIX 1

### PLANNING APPEAL

#### Gladman Developments: proposed development at Summer Street, Stroud Commentary on Landscape Implications

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

#### Introduction

Gladman's second application for housing development on this site occupies a slightly smaller area and proposes up to 112 houses, a reduction from the earlier application.

#### Report on landscape impacts

In recent years there have been several planning applications for housing on fields in the lower Slad Valley on the outskirts of Stroud. In all previous cases the applications have not succeeded. This leads to the obvious question 'why try again, now?' The answer probably lies in the national priority being given to increasing the rate of house building, combined with the fact that Stroud DC's 5 year programme of housing land has not yet been officially endorsed.

At stake is the future of the Slad Valley, a local, much loved landscape, associated with a well known author, Laurie Lee, and which is largely covered by a national landscape designation: so, as with the housing issue, there are local and national policy issues in play.

#### National policy on protected landscapes

The National Planning Policy Framework, and the more recently published National Planning Practice Guidance, both contain a strong commitment to the conservation and enhancement of Areas of Outstanding Natural Beauty and National Parks. Both are statutorily protected because of the significance of their landscapes. This commitment extends to their settings, as well as to the land within their boundaries. It is a truism, of course, that no landscape ever stands still: change is continuous, and although many people assume that change in a protected landscape should be gradual and small scale, large scale change is always a possibility. This is especially so if other national priorities over-ride the priority to protect the landscape, but such situations are rare.

In March 2013, as part of a major national project, Natural England published a revised profile, with Statements of Environmental Opportunity, for the Cotswolds (National Character Area 107)<sup>1</sup>. NCA profiles are *guidance documents which will help to achieve a more sustainable future for individuals and communities. The profiles include a description of the key ecosystem services provided in each character area and how these benefit people, wildlife and the economy. They identify potential opportunities for positive environmental change and provide the best available information and evidence as a context for local decision making and action.*

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1 See <http://www.naturalengland.org.uk/publications/nca>

The profile for the Cotswolds endorses the importance of protecting the Cotswolds AONB and its setting from inappropriate development.

#### The case for protecting the landscape in the lower Slad Valley

- Landscape pattern, form and function

The boundary of the Cotswolds AONB wraps closely round the built up areas of Stroud, with few exceptions. One of these exceptions is the lower Slad Valley: this green finger extends towards the town centre, separating the built up area along Summer Street from Uplands. Its open character probably reflects the north facing nature of the valley, which gets little sunshine throughout the winter months. Although not actually in the AONB, the proposed site is very much in its setting.

Stroud's five valleys display a complex interleaving of hill and valley, with open country often penetrating close to the town, and developed land extending out into open country. The land between Slad Brook and Summer Street is an excellent example of this complexity: the houses along Summer Street stretch out along the contours of the Slad Valley, but are subservient to the open landscape setting, with woods above and fields below. If the proposed development took place, this relationship would be significantly altered, as the finger of open space would be made much narrower. Because of the steep slopes near Slad Brook, the lower part of the site is much less visible than the higher fields, where development is proposed. So even if the lower areas were kept as a public park, the combination of that park with housing on the top fields would greatly affect the perceived character and quality of the landscape: land that is currently typical of the permanent pasture of the Cotswolds AONB would be suburbanised.

The proposed Country Park, when viewed in plan form, is larger than the area proposed for housing. But when looked at in three dimensions it is clear that this is a north facing, low lying area that would be cold and uninviting for several months of the year, and which, because of the steepness of the valley, would not be visually dominant.

Although not a biodiversity expert, I accept that if the proposed two fields are developed, with houses with substantial gardens and a well-managed park, wildlife might benefit in time. But at present nothing definite is known about the housing layout, or the future management of the park. The net density of the housing development could well be too great to support wildlife, and there is no guarantee that the park would be well managed: high densities and poor ongoing management would result in no benefit to wildlife or landscape.

The developer's Design and Access Statement has many references to green infrastructure within and beyond the site, but for this to be effective, it needs to fit into a Green Infrastructure Strategy for the Stroud Valleys. Sadly this



does not yet exist, although I understand that it is now being worked on. Current Government policy for nature conservation stresses the importance of increasing connectivity across all landscapes, so that natural processes and wildlife can flow more effectively. Policy for spatial planning similarly stresses the importance of green infrastructure. Land in the Slad Valley has the potential to fit both policies, but with no locally relevant policies, or practical strategies to make them real, even the most environmentally friendly development on this site is unlikely to make a difference.

- Views in and out of the site  
The best views from public roads are from the B4070 from Stroud to Slad, and from Folly Lane, that runs just below the ridge on the north side of the Slad Valley to Bulls Cross above Slad. Although both are public roads, they are also popular recreational routes for walkers, runners and (in the case of Slad Road) cyclists. There are oblique views up and down the valley, to and from Swifts Hill and from other footpaths, enjoyed by walkers and runners.

The developer's LVIA underplays the visual significance of the proposed development. The LVIA appears to show views of the site at field level. The graphics in the developer's Design and Access Statement are indicative only, and cannot be relied upon. It is highly likely that the actual development would be far more intrusive than claimed.

- The things that people need (apart from houses)  
People need a landscape to work well for them, as they go about their daily lives. A recent Landscape Institute policy statement on Health and Wellbeing<sup>1</sup> summarises recent knowledge. It is important that all site design increases the healthy options available to people to build physical activity into their regular journeys. So as well as houses, people need easy, level access to local services on foot and by bike, and places for children of all ages to play safely. The proposed site has footpath access (a public right of way) both up to Summer Street and down to Slad Road, but it is very steep and currently very muddy. In wet weather it is also very muddy. There are no paths from the site along the slope into Stroud.

The application documents show no footpath or cycleway links from the site into Stroud, other than along the road network.

The proposed park in the valley bottom might be a lovely place for older children to play, in summer, but would not be suitable for any child who needs supervision. This second application includes a site for a play area for younger children, but it is at the far corner of the proposed housing, rather

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<sup>1</sup> See <http://www.landscapeinstitute.co.uk/policy/health.php>

than in its centre, confirming the lack of real understanding of the need to make convenience for people on foot a high priority. Pedestrian routes in and out of the site would be along roads with steep gradients. This means that residents are likely to be highly car dependent, which is bad for human health and wellbeing and also environmentally damaging.

#### Conclusion

The changes in this second, refused application do not alter my original judgment made at the time of the first one, that development of this site is inappropriate in principle. That is why this report is very similar to the one that I prepared in 2013 for the first application.

The planned development is on a highly visible site, whose character is consistent with that of the nationally protected landscape that is only a couple of fields away. It is a critical part of the countryside of Stroud's five valleys. The District Council's decision to refuse this application was the right one. A perceived lack of certainty on the district's five year housing land supply should not lead to ill-informed decisions that put at risk this nationally protected landscape

31 March 2014

## **APPENDIX 2**

### **PLANNING HISTORY**

#### **Between 1967 and 1995**

During this period four planning applications were submitted for major housing development on the whole or part of the application site.

Local Planning Authority - Gloucestershire County Council

1. April 1967 - Land at Summer Street, Stroud (S.7338 5721 TM2)

Mr D L V Baxter submitted an application to develop approximately 24 acres of land for residential development; the application was refused for the following reasons:

*(a) Surface water from this development would have to be discharged into the Slad Brook which in parts of its culverted sections is already full to capacity and it would be likely to cause flooding in parts of the town.*

*(b) Summer Street because of its width and lack of footpaths is not suitable to serve as an access to the development proposed.*

*(c) The site does not have sufficient frontage to Summer Street to allow for an estate road junction in accordance with the standards of the Local Planning Authority.*

*(d) The development of this site by a long cul-de-sac with a sub-standard junction is undesirable and if the land is to be developed in the future it should take place as part of a much larger scheme.*

*(e) The land is not included in the approved Development Plan for foreseeable needs and land allocated for development is still available. In the opinion of the Local Planning Authority, this land which is not open to the same objections as the land subject of this application, should be developed first.*

The refusal was not appealed.

2. July 1969 - Land at Summer Street, Stroud (S.7338/A 6609 TM2)

Mr D L V Baxter submitted an application to develop approximately 9.3 hectares of land for residential development; the application was refused for reasons similar to (a), (b), (d) and (e) in paragraph 1 above.

The refusal was not appealed.

3. September 1973 - Land at Slade Farm, Summer Street, Stroud (S.7338/B 8455 TM2)

Bovis Homes Western Ltd submitted an outline application for residential development and construction of new vehicular and pedestrian accesses; the application was refused for the following reasons:

*(a) The site of the proposed development is within an unallocated area of the County Development Plan within which it is intended that the existing uses of land shall remain for the most part unchanged and the development now proposed would constitute an undesirable departure from the provisions of the Plan.*

*(b) The site of the proposed development forms part of an open hillside between Slad Road and Summer Street and occupies a prominent part of the landscape. In the opinion of the Local Planning Authority the development of this site would be detrimental to visual amenities of the area. Furthermore land which is not subject to the objections of this site should be developed first.*

*(c) In the opinion of the Local Planning Authority the roads leading to the site are not suitable to serve the development proposed.*

*(d) In the opinion of the Local Planning Authority there may be drainage difficulties due to the possible incapacity of the main sewerage works to deal with any further increase in the volume of sewerage to be treated.*

*(e) The development of this site will cause surface water drainage difficulties.*

The refusal was appealed, which was dismissed by the planning inspector.

Local Planning Authority - Stroud District Council

4. February 1995 - Land to the north of Nos. 21 - 81 Summer Street, Stroud (S.7338/P)

Four Oaks Developments Ltd submitted an outline application for the erection of a residential development to include a new access onto Summer Street, and ancillary works; the application was refused for the following reasons:

*(a) The site forms an important element of the open landscape and its development would significantly harm the quality and character of the landscape and is contrary to Policies L1 and L3 of the Structure Plan for Gloucestershire (first alteration).*

*(b) The proposal is contrary to Policy H4 of the Stroud District Local Plan (deposit version) in that the proposal is not compatible with landscape and the visual character of the area. The proposal is not compatible with the scale and character of the existing development in the area and the proposal does not conform to other policies of the Local and Structure Plans.*

*(c) The development of the site would set a precedent for further residential development of the adjoining land which would be further harm to the quality and character of the landscape.*

*(d) The proposed roundabout at the Summer Street entrance to the site would introduce alien highway design element into the historic road pattern and which, by virtue of its size, design and materials, would detract from the established inter-relationship between the Listed Buildings and Summer Street, to the general detriment of the setting of the Listed Buildings.*

The refusal was appealed but subsequently withdrawn.

#### Linked Appeal

January 2013 - Land at Summer Street, Stroud (S.13/0166/OUT)

Gladman Developments Ltd submitted an outline application for up to 140 residential units including access, public open spaces and associated works; the application was refused for the following reasons:

*1. The development is located outside of the defined settlement boundary and is not essential for the operation of forestry and/or agriculture, contrary to Policy HN10 of the adopted Stroud District Local Plan, November 2005 and paragraph 196 of the NPPF.*

2. *The proposed development site forms part of an, incised valley landscape that is both a continuation of and indivisible from the adjacent Cotswolds Area of Outstanding Natural Beauty. This represents a distinctive and key characteristic landscape setting of the town of Stroud, including the Top of Town Conservation Area. The proposed development will consolidate the otherwise overtly linear built form within the site's context and it does so in a way that is poorly related to the town's historic evolution. In doing so, the proposed development will curtail important views and interrupt the length of the green valley in a way that devalues the landscape. The nature, siting and scale of the proposed development is, therefore, unsympathetic to the landscape, contrary to the objectives of 'saved' Policy NE8 of the adopted Stroud Local Plan, November 2005 and to paragraph 115 of the NPPF. It fails to conserve or enhance the distinctive and special landscape of the Slad Valley contrary to the objectives of Policy NE10 of the Local Plan, and causes harm to the setting of the Top of the Town Conservation Area, contrary to Policy BE12 of the Local Plan and paragraph 134 of the NPPF.*

3. *The settings of Slade House and The Cottage (grade II\* and grade II listed buildings respectively) contain substantial, open, rural countryside, reflecting a historic connection of these buildings to the local landscape. The proposed development site contributes in a major way to this setting. The proposed development will enclose, both heritage assets, irreversibly severing this historic relationship. This will cause significant harm to the setting of the two heritage assets, contrary to the objectives of 'saved' Policy BE12 of the Adopted Stroud District Local Plan, November 2005 ("the Local Plan") and paragraphs 129, 131, 132 of the NPPF. The proposed development does not provide substantial public benefits sufficient to outweigh this significance harm, contrary to paragraph 133 of the NPPF.*

4. *The proposed development site contributes to the open, rural settings of the dispersed heritage assets of Hazel Mill, Abbey Farm and Rifleman's Cottages, particularly when viewed from Swifts Hill to the North East. The proposed development will produce a consolidated urban form in close proximity to those buildings, eroding their settings contrary to the objectives of 'saved' Policy BE12 of the adopted Stroud District Local Plan, November 2005 and paragraphs 129, 131 and 132 of the NPPF. This is not outweighed by the provision of additional housing for the area and is, therefore, contrary to paragraph 134 of the NPPF.*

5. *There is potential for prehistoric remains to be present on the site which require investigation prior to determination of the proposal. Without the investigation, it has not been possible to fully assess the implications of the proposal to the archaeology, contrary to paragraphs 128 of the NPPF and Policy BE14 of the adopted Stroud District Local Plan, November 2005.*

FOOTNOTE: It is noted that on appeal the number of houses has now been reduced from 140 to 112.