

## Stroud Local Plan Review

### Emerging Strategy Paper Consultation

#### Response from the 'Friends of New Drive Field'

*A group representing over 50 residents living near the field: Painswick's PAI 012 (also known as "Hale Ground")* [REDACTED]

#### **Q. 4.2c Have we identified the right...villages for growth?**

It is not considered that Painswick should be promoted from a Tier 3 settlement to a Tier 2 settlement.

Painswick is in reality a small village. It was once an historic market town, however today the settlement has a tiny local retail role – one village store and a pharmacy to serve the day-to-day needs of residents and surrounds villages and hamlets.

It has a few other retail outlets including 2 gift shops, one charity shop, one clothes shop and one fabric shop. In the last 15 years Painswick has lost a Post Office, a bank, a fire station, a hairdresser and seven shops. It is inconceivable that the village could be considered as having moved up the settlement hierarchy whilst haemorrhaging services and amenities.

Painswick is extremely constrained by virtue of its high Heritage value, sensitive Landscape and historic built form, which is largely unsuitable for modern living, particularly vehicular traffic. The village suffers terribly from the blight of on-street parking which is exacerbated by the narrow winding roads that serve the village. The layout and infrastructure within the village are clearly not suitable for any significant level of growth. Significant levels of proposed development within Painswick will have a much more notable and adverse impacts than development elsewhere within the district.

Painswick is smaller than settlements such as Hardwicke, which by virtue of its location close to Gloucester is a far more suitable and sustainable location for future growth.

Painswick has a particular need for a particular type of housing – small, manageable, affordable units for younger people and those that wish to downsize. The village does not have a need for larger, more expensive homes. As such, Painswick should be seen as a minor centre for growth only for the right type of homes.

#### **Q.4.4c Do you support ..proposals to allow some development beyond settlement limits?**

It is accepted that some development, in certain circumstances must be allowed outside settlement boundaries.

However, as per the NPPF, the emerging Local Plan must place great weight on the 'conservation of the natural, built and historic environment, including landscapes and green infrastructure' (Para 20). 'Planning policies ... should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes [and] recognising the intrinsic beauty of the countryside'.

It is considered that by allowing a significant level of growth outside existing settlement boundaries the emerging plan would have a negative impact upon landscapes and green infrastructure. Furthermore, given that the vast majority of the countryside within the district is within a designated Area of Outstanding Natural Beauty, the impacts of overdevelopment or poor quality development in the open countryside would be particularly severe.

Paragraph 127 of the NPPF states that planning policies should ensure that developments 'are sympathetic to local character, history, including the surrounding built environment and landscape setting'. As such, whilst it is accepted that some development should be allowed outside settlement boundaries in specific circumstances, the criteria that such proposals should meet must be strict and ensure that such development does not negatively impact the setting of the AONB, landscape of heritage. It seems appropriate that the Local Plan should require that all development proposed outside settlement boundaries in the district should be accompanied by a landscape and visual impact assessment.

There is a need for low cost properties within Painswick. It is considered that, development outside settlement boundaries should only deliver the types of housing for which there is a clear and identified need.

#### **4.4e Do you support specific changes to ...existing limits**

Given the sensitive setting of many of the towns and villages within Stroud district, including the AONB, high quality landscapes, rich ecological sites and high quality heritage assets it is apparent that each case must be judged on its merits.

Continuing with existing settlement development limits as necessary may be overly restrictive and may prevent sympathetic development in appropriate locations. However, it is important that areas that are inappropriate for development are protected and as a consequence it is not acceptable to simply expand the types of development that is permitted outside settlement development limits.

An approach that carefully considers the impacts and consequences of the alterations to development limits is required so that an appropriate, bespoke solution is found for each settlement that considers the landscape, heritage and ecological issues pertinent to each settlement.

Option 2 therefore is the only appropriate approach given the high sensitivity of the countryside within the district.

#### **Q5.0a Do you support the proposed mini-vision for your area?**

Relevant area - *The Cotswold Cluster; Painswick P.94.*

We broadly support the mini-vision but with some important exceptions.

Landscape sensitivity: It is considered there is NO potential within the existing boundary for housing growth except perhaps the Parish Planning Committee's exception for PAI 001 along Gyde Road. It is considered there is limited potential on/outside the northern edge of the settlement.

#### **Q5.0b Would you like to propose alternative wording...?**

Yes, Our wording:

*"Painswick is a large village; long ago it was an historic market town"*

*"The settlement has a small local retail role, - one village store and a pharmacy to serve the day-to-day needs of residents and surrounding villages and hamlets. It also has a small number of other shops, although many have been lost over the last 15 years representing the villages decline as a local centre.*

*"It offers a good, diverse range of local community services and facilities: GP and pharmacy, dentist, hairdresser, beautician and physiotherapists, primary school and pre-school, places of worship, 2 pubs, 5 restaurants/coffee shops, village halls/community centres, sports/playing fields and recreation ground."*

then, as your wording.

So, we conclude that Painswick should not be upgraded to a Tier 2 settlement for the reasons outlined in the answer to question 4c.

#### **Q5.0c Do you support the identified key issues and priorities for action?**

Yes, broadly, but see specific comments at 5.0d and 5.1a

#### **Q5.0d Are there other important issues and priorities you would like to highlight?**

Dynamic plans should be developed to accommodate the expected growth of visitors to Rococo Garden and the Painswick Centre. Crucially, Painswick is blighted by on-street parking and urgently needs substantial parking space at the northern end of the village. More preservation of the key features of Painswick should be arranged, specifically including the remaining open spaces.

We consider that a careful balance needs to be struck between growth and conservation of landscape and heritage assets. Areas of particularly high landscape or heritage value must be protected from inappropriate development, particularly large scale and high density development. As indicated in the appended Landscape Briefing Note, prepared on our behalf by [REDACTED] a chartered landscape architect.

[REDACTED] notes that the AONB Landscape Strategy and Guidelines makes specific reference to the sensitivity of Painswick:

*"The town of Painswick, occupying a spur of land separating two valleys is highly visible and an important component of the wider landscape. Therefore, the settlement is sensitive to further development on its fringes. The wider valley is also sensitive due to its rural character."*

It is apparent therefore that the whole of the village is extremely sensitive to new development and as such it is crucial that the emerging plan recognises this and puts in place the requisite protections and creates policy designations to ensure that all new development that comes forward in the village is sympathetic to the landscape character of the area. Due to the configuration of Painswick within a valley, even small scale development carried out poorly could have a significant adverse impact upon this historic settlement and the wider area. As such, it is important that the emerging plan recognises

that even relatively minor development within Painswick can have a significant effect on the setting of the historic village and the wider setting of the AONB.

also notes that the *Cotswolds AONB Management Plan* states that

*'Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views – including those into and out of the AONB – and visual amenity are conserved and enhanced.'*

As such, it is clear that, in order to ensure that the emerging plan is in line with the CAONBMP, great emphasis must be placed on the importance of the landscape within and outside of settlements, and that policies ensure that new development does not have an adverse impact upon the landscape setting of the district.

It is accepted that new development will be required in some areas that are sensitive in terms of landscape and heritage, however it is considered to be absolutely crucial that such development respects local settlement patterns, building styles, scale and materials. Firstly, in order to comply with Policy CE3 of the CAONBMP, but also to ensure that the natural and built heritage of the district is not eroded by development that is inappropriate given the high-quality character of the area.

To this end open spaces within historic settlements such as Painswick add greatly to the setting of the AONB and its character it is considered that the plan should consider including policies that seek to protect open spaces, whether public or private, within the village in recognition of the contribution they make to the historic and natural landscape.

**Q5.1a Assuming some growth is desirable, have we identified the best sites?  
Cotswold Cluster, Painswick. P94**

No. On the detailed Painswick map P94 there is only one Potential Site, PS.41 (PAI004) for 20 dwellings. (Mistake that should be 15). And there is vague unspecified mention of "Alternative sites, outlined in blue". More clarity please, especially as more sites PAI - 003,009,010,011,012 etc. are not identified either outlined in blue or dismissed.

Sites 007,008 (and also 012, not shown) should be confirmed as NOT appropriate for development as per the SALA, and become heritage sites as important parts of the landscape.

We suggest you locate new development, so that it is well-connected to the A46 Cheltenham Road and so that it has good and safe footpath linkages with the village centre.

***Appendix 1 – Landscape Briefing Note***

## BRIEFING NOTE

<b>Date:</b>	13.01.2019
<b>To:</b>	[REDACTED]
<b>Project:</b>	Stroud District Local Plan Review - Consultation on Emerging Strategy 2018
<b>Subject:</b>	Landscape Statement on behalf of the Friends of New Drive Field

### Introduction

1. Lying at the heart of the "Cotswold Cluster" and with the Cotswold AONB designation washing over the whole of the town and surrounding countryside, Painswick is considered by many to be "the Queen of the Cotswolds" – its character, built heritage and landscape combining to form the quintessential Cotswold settlement. The landscape (and townscape) character of the AONB is considered to be both highly valuable and highly sensitive to change that would arise from inappropriate development types or development in inappropriate locations.
2. Whilst it is accepted that there is a need for some limited residential development within the town in order to meet local housing needs and help maintain and improve the vitality of local services (which are also so important for the wider local area), such development needs to be designed and located so as not to detract from the essential (and historic) character of the town, the character of the Painswick Valley, or of the wider Cotswold AONB as a whole.
3. The 2018 Emerging Strategy Consultation seeks the public's views on the five identified key issues for development within the district. This Landscape Statement sets out those of the key issues that are linked, either directly or indirectly, to the landscape and townscape character of Painswick and the surrounding valley landscape. The Statement then provides professional opinion and guidance as to how published background papers produced as part of the local plan review, together with published landscape character assessments and guidelines, should influence and guide the decision process for locating future development within the Painswick Valley and surrounding area.

### Strategy Issues relating to Landscape Matters

4. The Emerging Strategy Consultation document sets out five key issues to be addressed through the Local Plan Review, these having been identified as being most important through earlier stages of the public consultation process. Of these five issues, two are considered to have links to landscape matters: Issues 2 and 4.

*Issue 2: Conserving and enhancing Stroud District's countryside and biodiversity including maximising the potential for a green infrastructure across the district:*

- *providing a robust policy framework for protecting and conserving the green network and identifying and delivering extensions and improvements to the existing network.*

*Approach Suggested through Public Consultation: establishing green links along river/canal corridors; expanding AONB boundaries.*

5. The landscape and townscape character of Painswick comprises a mix of:

- typically older, more dense development within the core of the town, particularly within the Conservation Area;
- less dense development spreading out from the centre, consisting of often larger properties situated in larger plots/gardens; and
- undeveloped areas of green/open space, linked by linear green infrastructure in the form street and garden trees, and gardens.

6. Importantly, the character of the town and its environs is discernible not just from within the town itself but also from the surrounding Cotswold countryside, notably from the country lanes and Public Rights of Way (PRoWs) on the south-east side of the Painswick Valley. In views from such locations the open/green spaces within the town, as well as the fingers of green infrastructure extending into the town from the surrounding landscape, help to reduce the perceived scale of the town by breaking up the parcels of built form and forming a lattice of green infrastructure which spreads across the town.

*Issue 4: Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment:*

- *safeguarding local wildlife-rich habitats and wider ecological networks/areas identified for habitat management, enhancement, restoration or creation;*
- *promoting the conservation, restoration and enhancement of priority habitats and ecological networks, and the protection and recovery of priority species;*
- *managing growth to secure mitigation and measurable net gains for biodiversity.*

*Approach Suggested through Public Consultation: protecting greenfield land from unnecessary development; conserving and enhancing open spaces and wildlife habitats.*

7. The green infrastructure noted above provides more than just landscape benefits. Green infrastructure does not need to be a designated nature reserve or Site of Special Scientific Interest (SSSI) to be beneficial for the ecology and environment of the Cotswolds – connected hedgerows, gardens, rows of street trees and even 'ordinary' patches of grassland can all form important components within the green infrastructure network. It is

---

the connectivity that is important, rather than the scale or quality (though of course these also increase the value of and benefits that derive from the green infrastructure network).

8. Earlier stages of the Local Plan consultation process identified that people living and working in the District considered the protection of greenfield land from development to be an important route to minimising the effects of development on the natural environment. The protection of existing open spaces within settlements was also identified as being important. This shows that local people consider that open spaces within the settlement boundaries are important and should not be necessarily be used for infill development just because they are within the settlement boundary and/or are surrounded by existing built form.

## **Published Landscape Character Assessments and Guidance**

9. The Painswick area is considered under two different published landscape character assessments: the 2000 Stroud District Landscape Assessment Supplementary Planning Guidance, and the 2002 Cotswolds AONB Landscape Character Assessment (and accompanying Cotswolds AONB Landscape Strategy and Guidelines).

### **Stroud District Landscape Assessment**

10. The Stroud District Landscape Assessment places Painswick in the Secluded Valleys landscape character type (LCT), the key characteristics of which are described as:

- *"enclosed, secluded character;*
- *steep sides, concave narrow valley form; steeper upper slopes forming abrupt break of slope with Wold Tops landscape;*
- *complex interlocking valley/ridge forms in some areas;*
- *extensive bands of deciduous ancient woodland along valley rims;*
- *tall hedges forming enclosure within the valleys with many hedgerow trees;*
- *predominantly pastureland;*
- *field size varies relative to degree of slope; more open character where valleys join and broaden out;*
- *scrub and unimproved grassland on steep and broken slopes;*
- *fast flowing streams draining to River Severn and tributaries;*
- *dry stones walls on higher land;*
- *settlement: larger settlements at valley mouth and junctions on flatter land; smaller settlements, e.g. cottages and mills along valley bottoms and along upper valley rims."*

11. Relevant key priorities for action are identified as:

- *"ensure that careful and stringent planning controls on the siting and design of new development are provided to maintain the character of this landscape type and to protect the AONB landscape;*



- *encourage the continued protection of important wildlife habitats;*
- *protect remnant pastures and small woodlands both on the valley sides and valley floor within the more urban pressured areas."*

12. Painswick itself is noted as a larger settlement, while the wider Painswick area is described thus:

*"The area north of Stroud covered by the Painswick and Slad Valleys has a distinct character of its own. These parallel valleys have created a broader basin which is evident when viewed from the surrounding higher land; the ridges having been vigorously eroded to more rounded profiles. Sometimes upstanding knolls and spurs marked by prominent trees are left between the wider, shallower slopes which occur at the valley junctions."*

13. Settlements are generally described as being *"fairly well contained"* and having *"...the character of overgrown and scattered village settlements rather than towns... The valleys therefore tend to have a rural character with contained views and a clearly defined visual envelope. The variety of vegetation cover and complexity of the landscape pattern makes this landscape aesthetically pleasing."*

*"The main pressures for change in this character type are from built development, including improvements to communication routes. Potentially much can be done to integrate new development through sensitive planning and design and response to traditional building types..."*

### **Stroud District Landscape Sensitivity Appraisal**

14. As part of the local plan development process, Stroud DC commissioned a landscape sensitivity appraisal to consider the sensitivity of the local landscape in which the Potential Locations (PLs) for development (housing, mixed use and employment) which had been identified through the local plan consultation process are found. None of the PLs are located within Painswick and the surrounding area, and the landscape and townscape within and surrounding Painswick was not therefore considered in the 2013 landscape sensitivity appraisal.

### **Stroud District Landscape Sensitivity Assessment**

15. Stroud DC commissioned a second landscape sensitivity assessment in 2016. This identified the land immediately surrounding the settlement boundary of Painswick as being of predominantly high sensitivity to residential development, with limited areas to the north-east and south-west being of high/medium sensitivity. The assessment did not however consider the sensitivity of any of the open spaces within the settlement boundary.

## Cotswolds AONB Landscape Character Assessment

16. The Cotswolds AONB Landscape Character Assessment places Painswick in the High Wold Valley LCT (LCT8), specifically within the Painswick and Slad Valleys landscape character area (LCA8B). Key characteristics of the Painswick and Slad Valleys part of the LCT are described as:

- *"wider and complex valley form to Painswick Valley and its tributaries, but with steep and convoluted slopes, separated by intermediate ridges that project into the main valley form;*
- *rich pastoral and secluded rural character with intermittent consolidated areas of arable land; and*
- *significant areas of registered common land and ancient semi-natural woodland in the upper reaches of the Painswick and Slad Valleys."*

17. The Painswick Valley part of the Painswick and Slad Valleys LCA is described thus:

*"In contrast to the other High Wold Valleys the Painswick Valley is much broader in form with major secondary embayments that extend close to the escarpment.*

*The major folded structure of the Painswick syncline has had a significant influence on the valley morphology. The Painswick Stream has exploited the synclinal structure and eroded back through the Oolitic Limestone to create a bowl like valley, the headwaters cutting back almost to the escarpment edge. Secondary headward erosion by the Wash Brook, a tributary of the Painswick Stream, has resulted in two principal valley heads, while a third smaller re-entrant occurs to the east at Sheepscombe. No High Wold exists on the western boundary of the Painswick Valley. Instead there is a notable ridge between these two landform units defined by Scottsuar Hill, Huddinknoll Hill and Cod Hill and eventually to High Brotheridge. The Painswick Stream and the Wash Brook are separated by a prominent projecting ridge that extends southwards from Painswick Hill on the escarpment edge at 283m AOD down to the settlement of Painswick. The ridge is underlain in part by the more resistant Marlstone Rock Formation that outcrops below Painswick and forming a notable bench. To the east, the Wickridge Hill ridge, rising to 232m AOD, separates the Painswick Valley from the Slad Valley.*

*In addition to the principal watercourses within the Painswick Valley catchment, numerous springs emerge along the middle valley slopes from which a myriad of minor watercourses further dissect the valley slopes creating a complex rolling and locally folded landform.*

*Much of the Painswick Valley is under mixed, mainly improved, pasture and arable production within both irregular enclosed fields particularly to the north-east of Painswick, and more regular medium scale fields to the west, particularly below Cud Hill where arable is more dominant. Such field patterns reflect the response to 18th and 19th century*

*parliamentary enclosure of both unenclosed cultivation patterns and former common pastures. Fields are enclosed by a mix of hedgerows and stone walls which together with the numerous hedgerow trees and field copses provides a sense of rural intimacy.*

*The principal settlement within the Painswick Valley is Painswick itself occupying a distinctive elevated position on the lower slopes of Painswick Hill ridge. Other villages and hamlets are scattered through the Valley, notably Whiteshill, Pitchcombe, Edge and Sheepscombe. The majority of buildings within the Painswick valley are constructed from locally quarried limestone that weathers to a silvery colour making the local buildings particularly distinctive.*

*While woodlands occur throughout the Valley, the valley slope woodlands are the most notable feature, particularly those at the head of the valley surrounding Cranham at Buckholt Wood, Saltridge Hill and Sheepscombe further south. Together these form notable skyline woodlands from within the valley. The Painswick Hill ridge also supports notable stands of woodland. Much of these more extensive areas of woodland are classified as ancient woodland.*

...

*The Registered Garden of Painswick House, including the restored Painswick Rococo Garden, is set within an impressive parkland setting and woodland overlooking the Wash Brook Valley, and is a notable feature immediately to the north west of Painswick."*

### **Cotswolds AONB Landscape Strategy and Guidelines**

18. The AONB Landscape Strategy and Guidelines makes specific reference to the sensitivity of Painswick:

*"The town of Painswick, occupying a spur of land separating two valleys is highly visible and an important component of the wider landscape. Therefore the settlement is sensitive to further development on its fringes. The wider valley is also sensitive due to its rural character."*

19. The Landscape Strategy and Guidelines recognises "development, expansion and infilling of valley settlements including residential, industrial and leisure" as a force for change, identifying the following potential landscape implications:

- *"erosion of the rural character of the valleys and the landscape setting of historic villages;*
- *intrusion of expanded settlements onto the highly visible valley sides;*
- *increase in light pollution;*
- *loss of village patterns and development of 'rural sprawl' due to settlement*
- *growth and coalescence;*

- *degradation of views across and along the valley;*
- *upgrading of minor roads and lanes associated with new development and the introduction of suburbanising features such as mini roundabouts, street lighting, highway fencing and kerbs and traffic calming at village entrances;*
- *erosion of distinctive settlement patterns and loss of small fields and network of narrow lanes associated with houses fringing the valley villages;*
- *loss/dilution of organic growth patterns of settlements including the relationship between the historic core and adjacent historic fields, paddocks and closes;*
- *loss of archaeological and historical features, field patterns and landscapes;*
- *interruption, weakening or loss of the historic character of settlements and the historic context in how have expanded, especially the importance of the relationship between the historic core of the settlement and surviving historic features such as churchyards, manor houses, burgage plots, historic farms, pre-enclosure paddocks and closes.”*

## Cotswolds AONB Management Plan

20. Relevant policies within the Cotswolds AONB Management Plan include:

### **Policy CE1: Landscape**

1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board’s Landscape Character Assessment and Landscape Strategy and Guidelines.

2. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views – including those into and out of the AONB – and visual amenity are conserved and enhanced.

...

### **Policy CE3: Local Distinctiveness**

1. Proposals that are likely to impact on the local distinctiveness of the Cotswolds AONB should have regard to, be compatible with and reinforce this local distinctiveness. This should include:

- being compatible with the Cotswolds Conservation Board’s Landscape Character Assessment, Landscape Strategy and Guidelines and Local Distinctiveness and Landscape Change;
- being designed and, where relevant, landscaped to respect local settlement patterns, building styles, scale and materials;

- using an appropriate colour of limestone to reflect local distinctiveness.

...

#### **Policy CE6: Historic Environment and Cultural Heritage**

...

3. Proposals that are likely to impact on the historic and cultural heritage of the Cotswolds AONB should have regard to these features and seek to conserve and enhance them. This should include respecting historical features, buildings, sites, layout and context, including the relationship between the existing feature or settlement and the landscape.

...

### **Cotswolds AONB Position Statement on Housing and Development**

21. The Position Statement makes a number of references of relevance to landscape matters in the context of Painswick:

*"...Each town and village has its own distinct character derived from topography, the settlement pattern, local architecture and history. This is a very fragile environment where a very small number of inappropriate new houses or other development can have a disproportionate effect on character.*

*The AONB is surrounded by major towns and cities and all of which are destined for continued significant economic growth. With good roads around and through the AONB, it is a very attractive environment for commuters to seek to live. Landscape character can be eroded by infilling in villages and by small estates on the edges of market towns attempting to meet this demand."*

*"Developments should integrate well into the historical pattern or character of the settlement. This will vary depending on the landscape character type and needs to be determined on a case by case basis."*

*"Developments should respect and conserve and not obstruct public views to higher slopes or skylines or sweeping views across the landscape."*

### **Painswick Parish Council**

22. The adopted 2017 Painswick Parish Action Plan, as published on the Parish Council website, raises three concerns of relevance to this Landscape Statement:

- *Retention of the local landscape and impact of development upon AONB a key consideration of PPC;*

- *In fill development not welcome in areas where the open character of the settlement is important and where in fill proposals are too large for the site; and*
- *Work to preserve 'green spaces' within the villages, especially in the centre of Painswick.*

## **Conclusions**

23. The emerging strategy identifies that the sensitivity of the landscape within and around Painswick means that there is only limited potential for development within or on the boundaries of the town. Only one area of the town is identified as being suitable for development of any scale – on the northern edge of the town at Washwell Fields.

24. The emerging strategy recognises the sensitivity and individuality of the landscape/ townscape (including the historic development pattern) of Painswick, while the need to protect greenfield land both within and outside of the settlement boundary is recognised in the published landscape character assessments and guidelines, by Painswick Parish Council, and by members of the public involved in the consultation process for the Emerging Strategy.