



LEONARD STANLEY

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To the Local Plan Review Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

15th January 2019

Emerging Strategy

The proposals for Leonard Stanley include:

- Remaining in Tier 3 but being classed as Tier 3a.
- A change to the Settlement Boundary to include the whole of Mankley Field (not just the area being developed known as 'Saxon Gate').
- An area of Mankley Field owned by Gloucestershire County Council (identified as PS16) to provide up to 30 dwellings plus open space (South of LS school).
- A further three alternative sites; LEO001 Land by the scout hall, LEO004 Land behind Seven Water and LEO005 Land East of the Grange.

Section 4.3 addresses the issue of where towns and villages should fall within the settlement hierarchy and "is a useful way of helping to determine which places can support future growth and which places cannot, and what quantity of development is appropriate".

Leonard Stanley Parish Council **disagree** with being categorised as Tier 3a and feel it would be more appropriate to be categorised as Tier 3b for the following reasons:-

1. Refer to Page 62 of the Stroud District Settlement Study November 2014; in which the evidence was used to form the original hierarchy - 'Conclusions: settlement roles and functions'. From that study we can see that several *villages now proposed to be categorised as Tier 3b have arguably, and in some cases, significantly better facilities than Leonard Stanley. (*Amberley, Horsley, Uley, Upton St Leonards and Whiteshill & Ruscombe).
2. Leonard Stanley is a separate village to Kings Stanley and we urge you to judge it as such. LSPC feel it is unacceptable to say that because Kings Stanley has retail facilities this is justification for considering that Leonard Stanley has such facilities; this maybe viable for residents that lie near the KS boundary but does not apply to the whole of the village.
3. Page 40 of the Emerging Strategy 2018 document states (under the Tier 3a heading) that a selection of villages including "Leonard Stanley have the potential for accessibility improvements because of where they are located". This is a matter on which LSPC strongly feels that the assessment bears little or no relation to the reality. Existing road links into the village from all *the current access points are totally inadequate. During the construction of Mankley Field pedestrian and cyclists lives have frequently been put at risk; for example by HGV's mounting pavements. Whereas theoretically the solution to some of these issues is investment, due to the very significant geographical constraints, realistically who is going to pay for them? LSPC would therefore like to be informed of what these improvements are likely to be

and who is going to pay for them – or **this statement should be removed from the Emerging Strategy.**

**Downton Road – narrow carriageway, narrow pavements and no street lighting, Frocester Road - narrow carriageway (country lane), no pavements and no street lighting, Ryeford Bridge – pinch points, narrow carriageway, narrow pavements and areas of congestion, Selsley Hill – narrow carriageway, pavements and limited street lighting.*

Section 4.4 addresses the options regarding development outside the existing settlement boundaries.

Settlement Boundary - Leonard Stanley Parish Council **do not** wish to see the settlement boundary extended to incorporate the whole of Mankley Field but only the area now known as Saxon Gate. Mankley Field incorporates two other parcels of land, one owned by Gloucestershire County Council which has been put forward for development (identified as PS16) plus a further parcel of land owned by Basilica.

Leonard Stanley Parish Council understands the reason why options regarding the development ‘outside the settlement boundary’ are being looked at – however the risk posed to exploit this is for Leonard Stanley too high. Therefore, Leonard Stanley Parish Council strongly supports Option 1; which has proved invaluable to SDC when defending planning appeals.

Section 5 addresses potential sites for development.

Further Development

Whilst LSPC sympathises with the difficult task of finding locations for the increased number of dwellings required for the District; this Council strongly objects to any further development encroaching on the valuable green spaces within our village. LSPC would like the following information to be taken into account:

1. A recognition of the recent levels of growth that Leonard Stanley has experienced*. This level of growth far exceeds the 15% identified as a need in the 2011 census.

*150 dwellings Mankley Field, 51 dwellings in Mankley Road (replacing 23) and numerous windfall dwellings (note a further 4 houses have recently been given permission for Brimley).

2. Whether further development is really sustainable. Residents that have recently moved into the village have reported severe difficulties in accessing services like GP surgeries and dentists. This situation is only going to increase as there are a vast number of dwellings with planning permission still yet to be built (Mankley Field and Stanley Mills). These residents will also have to compete for services with those new residents for West of Stonehouse!

3. With regards School places – Leonard Stanley School has confirmed to the Council that they are full with a current waiting list of 17. This is a concern as there are still 51 dwellings yet to be built, on the Saxon Gate development; therefore further development is **not** sustainable. There is an argument for the school to expand BUT this will be at the expense of losing the school playing field if Gloucestershire County Council sells off their ******land set aside for expansion (this is wholly unacceptable).

** See Site PS41 and comments below.

4. The neighbouring village schools in Kings Stanley and Eastington are also full.
5. A car is required to access most services and the roads are already feeling the pressure from the recent developments. To access Leonard Stanley you need negotiate some very steep hills and narrow roads, not really suitable for cyclists.
6. Further encroachment into the countryside will have a detrimental effect on the wildlife.

7. Further encroachment on our valuable green fields will cause material harm to the landscape views which are integral to the character of our village. Insufficient weight to the environmental impact and constraints appears to have been applied – please see **Planning Inspectorates comments on appeal decisions Appeal Decision APP/C1625/W/16/3150621** “at the shorter range, the proposed development would represent a noticeable and jarring encroachment into countryside that would materially harm the existing pleasant and distinctive degree of openness associated with this site and the contribution that makes to the setting of the village”. Also see Appeal Decision APP/C1625/W/15/3003612 which was dismissed partly because of the impact of the importance that open spaces and views have upon the village. “As a result, these views make a particularly valuable contribution to the setting and character of the village”.
8. LSPC has not seen any evidence of a need for further expansion for it to remain a sustainable and thriving community. Further expansion could lead to long term residents losing their identity with the village and actually move away (note it is undoubtedly these residents who make the village tick). Therefore further expansion could cause actual harm to the social sustainability of the community.

Site PS16 – the information provided on the SALA application (LEO007 2018) incorrectly states this as Brownfield – **it is actually Greenfield**; had this been correctly identified would this area of open space be included in the Emerging Strategy?

The SALA report also states **Availability summary**: “The owner/agent confirms that the site is available now for development and that there are no legal or ownership problems which could limit development”. However, the Parish Council understands that this land was subject to a covenant which restricts the use of this land for the expansion of the school – has proof been provided that this covenant is no longer enforceable? Again, if the covenant is still live then this site should be removed from the Emerging Strategy as it is not deliverable.

In summary – LSPC would like the following to be considered in the Emerging Strategy:-

1. To be re-classed Tier 3b.
2. To re-draw the Settlement Boundary to only include the new development (Saxon Gate) – not the whole of Mankley Field.
3. To ensure that there is no development permitted outside the Settlement Boundary.
4. To acknowledge that accessibility to Leonard Stanley is unlikely to be sufficiently improved (remove statement from page 40).
5. To recognise the material harm to the environment of further development to Leonard Stanley.
6. To recognise the material harm to the intrinsic character of the village by further development.
7. To comprehend that the school is already full and the preferred land put forward is the very land put aside for future growth of the school.
8. To acknowledge that Leonard Stanley has already taken sufficient development and that further development is **unsustainable**.

Leonard Stanley Parish Council thanks you for engaging with us to shape the future of our community and hopes that the concerns raised are fully addressed. If any of the following is still likely to be included in the reviewed Local Plan then LSPC would appreciate a meeting to ensure both parties have a full understanding of the rationale behind any decisions:

- 1) Settlement Boundary extended to include more than just the Saxon Gate development,
- 2) The inclusion of any of the sites put forward for development and
- 3) The statement of Page 40 regarding ‘accessibility improvements’.

Finally, please also see the ‘Pre-Application Community Involvement Protocol and this completed Addendum, adopted in May 2016.

Yours sincerely



Clerk

Enclosed: The Pre-Application Community Involvement Protocol and this completed Addendum for Leonard Stanley Parish Council, adopted May 2016.

Copy to: District Cllr Nigel Studdert-Kennedy
District Cllr Steve Lydon