
Representations on the Stroud District Draft Local Plan

Land at Wotton Road, Kingswood

On Behalf of Vistry Homes (currently trading as Linden Homes)

January 2020

**Land at Wotton Road, Kingswood
Representations on the Stroud District Draft Local Plan**

On behalf of

Vistry Homes

Project Ref:	29098/A5/LKT/lb		
Status:	Draft		
Issue/Rev:	0P1		
Date:	January 2020		
Prepared by:			
Checked by:			

Barton Willmore LLP
101 Victoria Street
Bristol
BS1 6PU

Tel: [REDACTED]

Ref: 29098/A5/LKT/lb
Date: January 2020

Email: [REDACTED]@bartonwillmore.co.uk

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

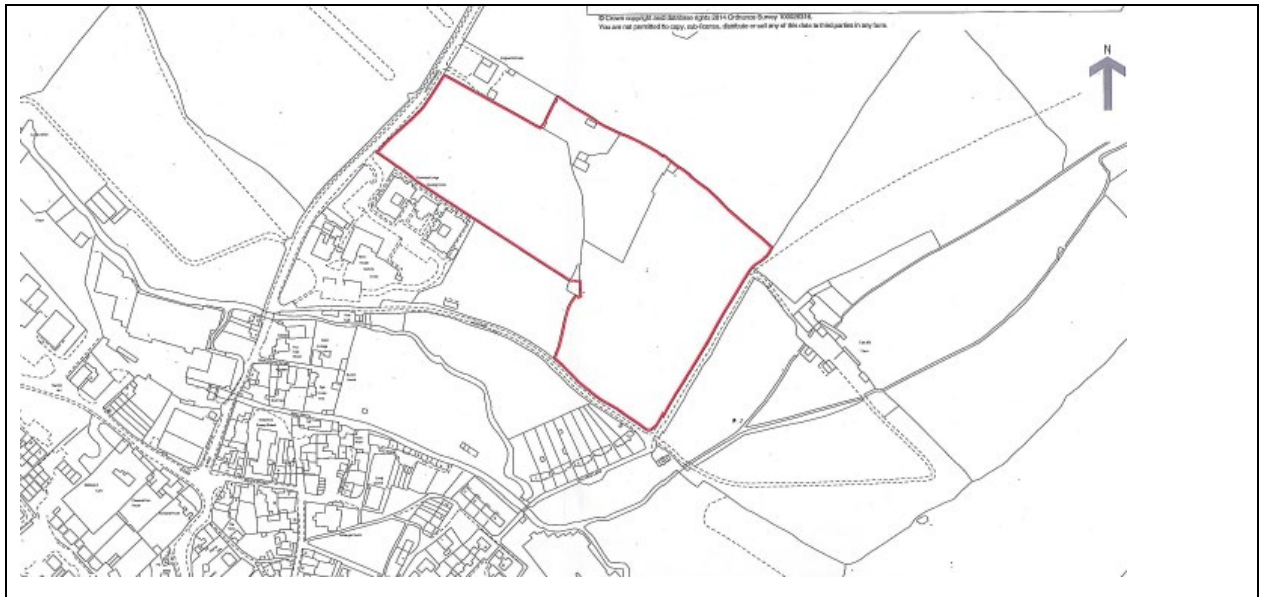
1. Introduction
2. The Development Strategy
3. Sustainability Appraisal
4. Site Allocations and Delivery
5. Conclusion

Appendix 1 – Stroud Settlement Role and Function Study Update 2018 - Levels of community services and facilities at each settlement

Appendix 2 – LVIA Ltd Landscape and Visual Study for Linden Homes (2019)

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Vistry Homes to the Stroud District Draft Local Plan (DLP) in respect of land at Wotton Road, Kingswood – see site plan below.



- 1.2 The site sits to the north of Vineyard Lane and to the east of Wotton Road on the edge of Kingswood in a suburban fringe context and is free of designations. Whilst the site is located on the edge of Kingswood, we note that the site falls within Wotton-under-Edge Town Council's administrative area.
- 1.3 The site is approximately 4 ha and has potential for circa 100 – 120 dwellings. Whilst it is located on the edge of Kingswood, close to available employment, schools and other facilities in the village, it is also well related to Wotton-under-Edge and its extensive services. Together the two settlements act as a cluster. Wotton-under-Edge is affected by a number of environmental constraints that prevent further growth of the town and land at Wotton Road, Kingswood could make a contribution towards the growth needs of Kingswood and Wotton-under-Edge.
- 1.4 Chapter 2 sets out representations on the Draft Plan's development strategy in respect of the vision and proposals for the Wotton cluster. Chapter 3 examines the sustainability appraisal of

the draft plan, and chapter 4 analyses the proposed delivery rates for the new settlements. A conclusion is provided in chapter 5.

2.0 THE DEVELOPMENT STRATEGY AND THE WOTTON CLUSTER

Draft policies CP2 and CP3

2.1 The Draft Local Plan identifies a total need for 12,800 homes across the District over the 20 year plan period 2020 – 2040 (applying the standard method) and draft policy **CP2** sets out how much growth is directed to individual settlements.

2.2 Draft policy **CP3** of the Draft Local Plan categorises settlements in the District into tiers:

Tier 1 – Main settlements

Tier 2 – Local Service Centres

Tier 3a – Accessible settlements with local facilities

Tier 3b – Settlements with local facilities

Tier 4a – Accessible settlements with basic facilities

Tier 4b – Settlements with basic facilities

2.3 Wotton-under-Edge is a tier 2 settlement, described as follows:

“These market towns and larger villages have the ability to support sustainable patterns of living in the District because of the facilities, services and employment opportunities they each offer. They have the potential to provide for modest levels of jobs and homes, including through sites allocated in this Plan, in order to help sustain and, where necessary, enhance their services and facilities, promoting better levels of self-containment and viable, sustainable communities”.

2.4 Kingswood is a tier 3a settlement, described as follows:

“These medium-sized and large villages are generally well-connected and accessible places, which provide a good range of local services and facilities for their communities. These villages benefit from their proximity and/or connectivity to higher tier settlements or transport corridors, which enable access to employment and key services and facilities elsewhere and which may offer some scope for further transport and accessibility improvements.

These are relatively sustainable locations for development, offering the best opportunities outside the District’s Main Settlements and Local Service Centres for greater self-containment.

Some of these settlements outside the AONB may have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements.” (DLP, page 50).

- 2.5 Despite the sustainable performance of Wotton-under-Edge and Kingswood, **Vistry Homes objects to draft policy CP2 which does not identify any strategic development sites at Wotton-under-Edge and allocates just 50 dwellings at Kingswood.**

- 2.6 **Vistry Homes also maintains its objection to the classification of Kingswood as a tier 3a settlement when it functions more like a tier 2 settlement** with the presence of 4 strategic level services (including a secondary school, sixth form, sports centre and swimming pool) within 500m of Kingswood, walking distance from the village, and closer to Kingswood than Wotton-under-Edge to which these facilities are attributed to – see table of strategic and local facilities in appendix 1. Applying the more accurate strategic score for Kingswood (shown in brackets) would change its rankings as per the revised table below:

Settlement	Strategic score	local score	Current tier in local plan
Stroud	10	12	Tier 1
Dursley	7	12	Tier 1
Wotton-under-Edge	7	12	Tier 2
Stonehouse	5	12	Tier 1
Berkeley	4	9	Tier 2
Kingswood	0 (4)	8	Tier 3 (Tier 2)
Nailsworth	2	12	Tier 2
Manor Village (Bussage)	2	7	Tier 3
Cam	1	12	Tier 1
Minchinhampton	1	10	Tier 2
Painswick	1	10	Tier 3
Bisley	0	9	Tier 3
Eastington	0	9	Tier 3
Frampton on Severn	0	9	Tier 2
Uley	0	9	Tier 3
Kings Stanley	0	8	Tier 3
Brinscombe	0	8	Tier 3
Chalford	0	8	Tier 3

2.7 This is demonstrated in table 6 of the Settlement Study (2018) which looks at accessibility based on distance, rather than settlement limits. This shows that Kingswood has 'very good' overall accessibility, as one of the highest performing 3a villages (along with North Woodchester), with Kingswood performing equally as well as Wotton-under-Edge (tier 2 settlement) – see extract from table below.

Settlements in Stroud District	Overall rating	Overall score **	Total score (driving) *	Total score (by bus/ on foot) *	Post office		Super-market		Library		Primary school		Secondary school		FE College (inc. 6 th form)		GP		Pharmacy		A&E or MIU		Current classification in the Settlement Hierarchy		
					Drive	Bus/ walk	Drive	Bus/ walk	Drive	Bus/ walk	Drive	Bus/ walk	Drive	Bus/ walk	Drive	Bus/ walk	Drive	Bus/ walk	Drive	Bus/ walk	Drive	Bus/ walk		Drive	Bus/ walk
					Dursley	BEST	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0
Cam	BEST	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Tier 1
Stroud	V-GOOD	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	Tier 1	
North Woodchester	V-GOOD	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	Tier 3
Wotton Under Edge	V-GOOD	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	Tier 2	
Thrupp	V-GOOD	2	0	2	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	Tier 4
Kingswood	V-GOOD	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	Tier 3	
Stonehouse	V-GOOD	3	0	3	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2	Tier 1	
Selsley	V-GOOD	3	0	3	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	1	Tier 4	
Brimscombe	V-GOOD	3	0	3	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	1	Tier 3	
Berkeley	V-GOOD	3	0	3	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	1	Tier 2	
Eastcombe	V-GOOD	3	0	3	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	1	Tier 4	
Newport	V-GOOD	3	0	3	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	1	Tier 4	
Newtown & Sharpness	V-GOOD	3	0	3	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	1	Tier 3	
Amberley	GOOD	4	0	4	0	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	Tier 3	
Painswick	GOOD	4	0	4	0	0	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	1	Tier 3	

Settlement Role and Function

2.8 Section 3 of the draft plan splits the district up into 8 parish clusters and sets out a draft mini-vision and priorities for the future of each cluster. Kingswood falls within the Wotton Cluster which also includes Wotton-under-Edge, North Nibley, Alderley, Hillesley and Tresham. In terms of settlement role and function, the key settlements within the Wotton cluster are Wotton-under-Edge and Kingswood. The other settlements are smaller settlements and are not expected to play a significant role in the development strategy for the Wotton cluster area.

2.9 The Stroud District Council Settlement Role and Function Study Update 2018 was published in May 2019. The findings for Kingswood and Wotton-under-Edge appear to be similar to those in the 2014 study and are summarised below.

Retail and community service roles:

- Wotton-under-Edge has a **strong strategic retail role** as one of the District's 5 town centres drawing consumers from a wide catchment. In addition, Wotton offers a **very good range of 'strategic' facilities**, as well as a **very good** full range of **local community services and facilities** including a doctor's surgery, pharmacy, dentist, bank/building society, post office, pre-school, primary school, secondary school, 6th form, library, cinema/theatre, swimming pool, sports/leisure centre, place of worship, village hall, pubs, playing fields/sports pitches, equipped playground, and petrol filling station (page 75).
- Kingswood has a strong role in providing local community services and facilities. It has a village shop, post office, primary school and pre-school provision, place of worship, village hall/community centre, pub, playing field/sports pitch and equipped playground. **Access to key services and facilities** here and elsewhere is **very good**. All the key services are accessible within 15 minutes by both car and by public transport / on foot, with the exception of Dursley's A&E / MIU (average travel times by bus exceed 30 minutes), (page 95).

Employment roles:

- Wotton-under-Edge has a **strong employment role** as a significant employment provider: around 1,300 jobs are based locally and there is around ½ a job available here per economically active resident (page 74).
- Whilst Wotton is a net-exporter of workers, the proportion who work within 2km (1.2miles) of home is amongst the highest of any settlement in the District (page 74).
- Despite the large net out-flow of workers, Wotton-under-Edge is one of the District's better functioning settlements, in terms of its ability to service the employment needs of the local community and match the characteristics of the resident workforce (page 75).
- Kingswood has a **strong employment role**. There are nearly 1,200 jobs based locally, which gives Kingswood 1.63 jobs per economically active resident. Kingswood is a net importer of more than 400 workers. (census 2011. 2014 Study), (page 95).

2.10 Chapter 7 of the Settlement Role and Function 2018 Update brings together all of the findings for each settlement and begins to set out a view as to their future roles and functions in order to

determine which places may be able to support future growth. In respect of Wotton-under-Edge, page 75 of the 2018 Update states:

“Growth should be prioritised towards the District’s larger and better-resourced settlements. As one of the District’s main towns, Wotton-under-Edge should be a priority location. However, the town faces significant environmental, physical and topographic constraints, which make significant expansion difficult.

Wotton-under-Edge’s relatively balanced population and healthy ratio of working-age residents is positive in terms of sustaining the settlement’s services and facilities. But having experienced relatively low housing growth since 2011, given its size and functionality, (and with no significant development currently anticipated), Wotton may benefit from some planned development, targeted and scaled to meet local housing needs”.

2.11 Page 74 provides further details on the low growth situation at Wotton-under-Edge:

“Wotton has experienced moderate housing growth of 6% between 2011 and 2018 (a net increase of 128 new dwellings), which matches the District-wide rate of growth (6%). Given its Tier 2 status and the current Local Plan’s strategy of targeting growth towards Tier 1-3 settlements, this is relatively low growth. However, Wotton does face significant environmental and topographic constraints to growth. As at April 2018, there were only a further 45 potential dwellings ‘in the pipeline’ (net commitments, HLA 2018)”.

2.12 For Kingswood, the 2018 Update Study concludes:

“Kingswood is relatively unconstrained by its environment and topography.

In accessibility terms, Kingswood offers a relatively sustainable location for potential growth and development, despite its lower tier status. It benefits from proximity to the larger service-centre settlement of Wotton-under-Edge and very good accessibility to key services and facilities.

Kingswood has an employment role, which could be sustained and boosted through appropriate new development and a policy framework that protects and/or intensifies existing employment functionality”.

2.13 We note that there is a draft site allocation PS47 which allocates 9 ha of employment land west of Renishaw New Mills, very close to Kingswood. This will have benefits for further increasing

employment opportunities and reducing out-commuting in this southern part of the district. This is positive planning for the Wotton cluster which already has a significant amount of employment and has very good access to facilities and services, and provision for employment growth here will further increase local employment opportunities.

Growth within the Wotton cluster

- 2.14 The Settlement Role and Function studies (2014 and 2018) recognise the sustainability of Wotton-under-Edge and Kingswood and it would appear that if it were not for the AONB around Wotton-under-Edge, the town would be a priority location for expansion – as stated on page 75 of the 2018 Study Update. However, the Council is of the view that physical constraints prevent any expansion of Wotton-under-Edge. **Vistry Homes objects that the emerging plan has failed to look at sustainable, alternative locations well related to Wotton-under-Edge, such as Kingswood, which could help to accommodate the growth that should be directed to Wotton-under-Edge.** This is dealt with further in chapter 3 of these representations.

Vision for the Wotton cluster

- 2.15 Page 133 of the Draft Plan reports that public consultation and the evidence base highlight that the key issues for the Wotton cluster include ensuring adequate affordable housing and opportunities for downsizing; preventing the loss of employment land; and maintaining and improving the vitality of Wotton-under-Edge High Street. However, it is hard to see how the actual development strategy will deliver these objectives when very little growth is proposed across this area. Negligible growth within the Wotton cluster will deliver very little affordable housing, limited new housing could put more pressure on existing employment sites in the area and very low growth in the context of a declining household size will stagnate the population, which coupled with an aging population could reduce the support for services and high street shops over time and this presents a long term issue for the key settlements within the Wotton cluster. This is contrary to protecting and enhancing the market town role of Wotton-under-Edge.
- 2.16 By way of illustration, using the data on page 12 of the 2018 Settlement Role and Function Study, the table below shows the population will barely grow over the plan period with just 45 – 53 dwellings to be developed at Wotton-under-Edge and 104 dwellings at Kingswood (based on existing permissions and proposed allocations). Over the period 2018 – 2039, the population is predicted to decrease in Wotton-under-Edge by circa 117 persons and increase at Kingswood by circa 168 persons, giving rise to a combined population increase of circa 50 people across the 2 settlements.

	Wotton-under-Edge	Kingswood
A. Population 2011 (census)	4899	1389
B. No. of dwellings 2011 (census)	2192	542
C. No. of dwellings built 2011 – 18 (taken from table 1 of settlement study 2018)	128	33
D. Total number of dwellings 2018 (B + C)	2,320	575
E. Population 2018 D x 2.27 ¹	5266	1305
F. Planning permissions not yet implemented (taken from table 1 of settlement study 2018)	45	54
G. Potential for housing within settlement boundary (SALA) ²	8	0
H. New housing allocations	0	50
I. Total dwellings in 2040 (ie D+F+G+H)	2373	679
J. Total population in 2040 (ie I x 2.17 persons per household) ³	5,149	1,473
K. Population change 2011 – 2040 (ie H – A)	Circa - 117	Circa +168

2.17 We note that North Nibley and Hillesley are also in the Wotton cluster but these are even smaller, constrained settlements without any future allocations and thus they are expected to make a minimal contribution (if any) to future housing supply and subsequent population increase across the Wotton cluster area.

¹ MHCLG 2014 based household projections: 2019 average household size in Stroud 2.27 persons per household.

² Looking at the 2017 Strategic Assessment of Land Availability and its 2018 and 2019 updates, there are no sites identified within the settlement boundary at Kingswood, and there is just one site with potential for 8 dwellings within the settlement boundary at Wotton-under-Edge (which is landlocked and not considered deliverable – but included so as to apply the Council’s full data here).

³ MHCLG 2014 based household projections: average household size in Stroud is projected to decrease from 2.27 in 2019 to 2.17 in 2039.

Summary

- 2.18 Vistry Homes considers that land at Wotton Road, located on the northern edge of Kingswood, a short distance from Wotton-under-Edge, could deliver growth to meet the needs of Wotton-under-Edge and Kingswood and help to achieve the vision for the Wotton cluster.
- 2.19 Kingswood is a sustainable location for growth and should have tier 2 status. Land at Wotton Road, Kingswood is suitable for residential development and should be allocated for around 120 dwellings in the new Stroud Local Plan.

3.0 SUSTAINABILITY APPRAISAL

3.1 A sustainability appraisal (SA) accompanies the draft Plan which assesses the emerging plan’s performance against sustainable development objectives.

Sustainability appraisal of the Wotton cluster vision and policy CP2

3.2 Page 44 of the Sustainability Appraisal (November 2019) provides a summary appraisal table of all of the mini visions for each of the cluster areas, including the Wotton Cluster – copied below.

SA Objective	‘Mini vision’ for each parish cluster							
	Stroud Valleys	Stonehouse cluster	Cam and Dursley	Gloucester’s rural fringe	Berkeley cluster	Severn Vale	Wotton cluster	Cotswold cluster
SA 1: Housing	+	+	+	+	+	0	0	+
SA 2: Health	+	+	+	0	+	+	0	0
SA 3: Social inclusion	+	0	+	+	+	0	+	+
SA 4: Crime	0	0	0	0	0	0	0	0
SA 5: Vibrant communities	+	+	+	+	+	0	+	+
SA 6: Services and facilities	+	+	+	+	+	+	+	+
SA 7: Biodiversity/geodiversity	+	+	+	0	+	+	0	0
SA 8: Landscapes/townscapes	+	+	+	+	+	+	+	+
SA 9: Historic environment	+	0	+	+	+	+	+	+
SA 10: Air quality	+	+	+	+	+	+	+	0
SA 11: Water quality	0	0	0	0	0	0	0	0
SA 12: Flooding	0	0	0	0	+	+	0	0
SA 13: Efficient land use	0	0	0	+	0	0	0	0
SA 14: Climate change	+	+	+	+	+	+	+	0
SA 15: Waste	0	0	0	0	0	0	0	0
SA 16: Employment	+	+	+	+	+	0	+	+
SA 17: Economic growth	+	+	+	+	+	+	+	+

3.3 This is supplemented by a commentary on page 48 of the appraisal report on the performance of the Wotton Cluster. Given the highly constrained development strategy for the Wotton area, one would have expected to see negative performance against the SA housing objective, as well as the services and facilities and vibrant communities objectives, as the proposed strategy for the Wotton Cluster will support very limited housing growth in the area, which could impact on localised housing supply/house prices, services and facilities and vibrancy. The SA report has completely overlooked the potential negative effects of the proposed strategy for the Wotton Cluster on these social objectives which is a considerable omission on the part of the Appraisal – implications of the appraisal should have been highlighted to decision makers.

3.4 Similarly, this negative relationship with social objectives for the Wotton Cluster should have been recognised in the appraisal of policy CP2 (the policy which sets out the distribution of development across the district) - but as this has not been picked up in the Wotton Cluster appraisal, it has also not featured in the appraisal of Policy CP2 either. Again, this is an inaccuracy on the part of the sustainability appraisal – particularly as the Settlement Role and Function evidence shows that the role of the Wotton-under-Edge warrants further growth but the chosen strategy for the cluster is to protect the environment at the expense of potential social impacts. This relationship should have been brought out in the sustainability appraisal.

Assessment of alternatives

3.5 So far, the sustainability appraisal of alternatives has centred around:

- SA of the four strategic growth options⁴ at the Emerging Strategy stage (SA November 2018); and
- SA of all proposed development sites, as well as those discounted at the Emerging Strategy stages (SA November 2019).

3.6 We note that there has not been an assessment of alternatives in relation to the 'mini -visions' for the Cluster Areas in the SA of the Draft Local Plan. For instance, no alternatives to the low growth option for the Wotton cluster have been considered – such as directing more than 50 dwellings to Kingswood in the Wotton Cluster area. Growth option 2 and growth option 3 of the Emerging Strategy document (November 2018) did include 200 dwellings and 40 dwellings at Wotton-under-Edge respectively, but the SA overlooked different spatial impacts of these strategic growth options on different parts of the plan area. Instead, the SA took a very broad brush approach to the impacts across the District as a whole – assuming that the highest levels of concentration (option 1) performed well against most of the SA objectives compared with option 2 (some dispersal) which was considered to perform less well. This suggests that very high level assumptions have been applied without any geographical / spatial considerations in terms of SA performance across different parts of the plan area – such that this high level analysis has overlooked the negative social impacts of concentration on the key Wotton cluster settlements. We also note that the majority of the differences in SA performance for the growth options appear to arise in relation to negative impacts on biodiversity (SA7); landscape/townscape (SA9); water

⁴Option 1 – concentrated development at the district's main towns; Option 2 – wider distribution of housing and employment at the edge of larger villages and main towns; Option 3 – Dispersal of development so that most villages had at least one small-medium sized site; Option 4 – growth point (i.e. new settlements).

quality (SA11); flooding (SA12); and efficient use of land (SA 13) for options 2 – 4, compared with option 1 (see SA summary table on page 41 – copied below - and para 4.32 of the Sustainability Appraisal Report (November 2018)).

SA Objective	Option 1: Concentrated development	Option 2: Wider distribution	Option 3: Dispersal	Option 4: Focus on a single growth point
SA 1: Housing	++	++/-	++/-	++
SA 2: Health	++/-	+/-	+/--	++/--?
SA 3: Social inclusion	++/-	+/-	+/--	++/--?
SA 4: Crime	0	0	0	0
SA 5: Vibrant communities	+/-	+/-	+/-	+/-
SA 6: Services and facilities	++/-	++/-	+/--	++/-
SA 7: Biodiversity/geodiversity	-?	--?	--?	--?
SA 8: Landscapes/townscapes	-?	--?	--?	--?
SA 9: Historic environment	+?/--?	+?/--?	+?/--?	+/--?
SA 10: Air quality	+	+/-	-	+/-
SA 11: Water quality	-	--	--	0
SA 12: Flooding	+/-	-	--	-
SA 13: Efficient land use	+/--	--	--	--
SA 14: Climate change	+	+/-?	-	+/-?
SA 15: Waste	+?	0	0	+?
SA 16: Employment	++/-	++/-	+/--	++?/-
SA 17: Economic growth	+/-	+/-	+/-	++?/-

3.7 However, as specific sites making up options 1 – 4 were not known or specified at the time, it could be equally plausible that sites could be selected in ‘more dispersed’ locations that avoid areas of high landscape / biodiversity value and land at risk of flooding, thus arriving at the same assumptions as option 1 (i.e. +/- or?). Alternatively, the same potential negative assumptions could apply to land around the largest towns (i.e. option 1) – the point being that the same unbiased assumptions should apply to all options, unless specific, identified sites are known to have particular constraints. In all likelihood, the selection of suitable sites (regardless of whether it is close to a town or in a more rural location), coupled with the application of the Plan’s environmental protection policies mitigating impacts will ensure that performance against these 4 environmental SA objectives (ie biodiversity (SA7); landscape/townscape (SA9); water quality (SA11); and flooding (SA12)) will be very similar across the various options. This means the SA

is misleading by suggesting there will be different performances for options 1 – 4 against SA objectives 7, 9, 11 and 12.

- 3.8 The performance against the efficient use of land (SA13) is also questionable. It is highly likely that the redevelopment of previously used land will comprise an element of all options and therefore, the total greenfield residual will be the same across all options. Therefore, performance against the efficient land use objective should also be the same for all options in the SA.
- 3.9 Another point of difference between the performance of the November 2018 growth options is the assumption that concentration of development is better for climate change / air quality but this does not take account of the impacts of very little growth in the Wotton cluster which in the context of smaller household size could lead to declining support and potential loss of quality/quantity/diversity of services and facilities affecting the vitality of Wotton-under-Edge, thus with people in the town and surrounding hinterland having to travel further to other settlements to access facilities.
- 3.10 So overall, the SA's assessment of alternative growth options for Wotton-under-Edge seems to suggest that no growth at the town / within the Cluster area is more sustainable than options 2 and 3 (ie some growth) whereas a more informed view of the geography of the area and the evidence would suggest that no growth in this area could be detrimental to social objectives – but this has not been brought out in the appraisal of the strategic options in the November 2018 SA or the SA of the mini visions (November 2019) and therefore, these potential impacts have not been explored in the sustainability appraisal.

Land at Wotton Road Kingswood - a sustainable location for development

- 3.11 The Wotton Road site is located on the edge of Kingswood, well related to employment, primary and secondary schools and other facilities in the village and also well related to Wotton-under-Edge and its extensive services. The site is currently in agricultural use and is not covered by any biodiversity, landscape or heritage designations. A public right of way passes through the site along the northern edge.
- 3.12 A very minimal amount of flood zone 2 covers a very small part of the south eastern corner of the site, with the rest of the site in flood zone 1 (low risk of flooding).



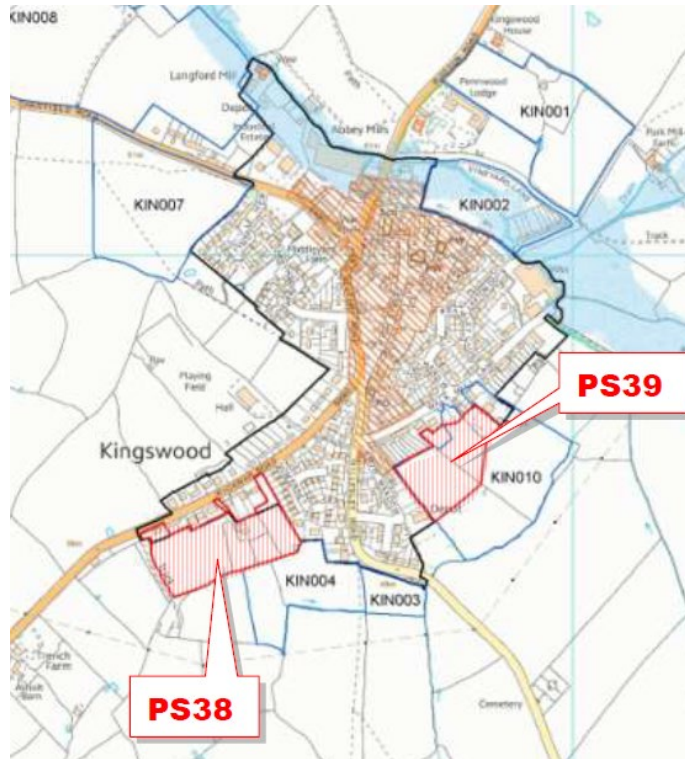
Dark blue = flood zone 3; light blue = flood zone 2.

- 3.13 Kingswood House to the north is listed, as is Park Mill Farm to the east and Penn House to the south, although Penn House and its context are separated from the site by the modern Pennwood Lodge development.
- 3.14 Strong hedgerows with intermittent trees form the site boundaries providing enclosure. Further enclosure is provided by the existing development that sits around parts of the site boundary. Adjacent development includes Kingswood House and Katharine Lady Berkeley’s School to the north; Wotton Road to the west; the retirement village, row of houses on Vineyard Lane and the settlement of Kingswood to the south and Park Mill Farm to the east. The site is also 0.2km from the Abbey Mills industrial estate. These urbanising elements mean that the site is perceived in a suburban fringe context.

Strategic Assessment of Land Availability

- 3.15 The Stroud Strategic Assessment of Land Availability (SALA) prepared in 2017 and updated in 2018 and 2019 has carried out an assessment of potential development sites around Kingswood. The Emerging Strategy Plan (ESP) considered 8 potential sites to accommodate 50 dwellings at Kingswood (as shown on page 88 of the ESP – copied below - of which two potential allocations

PS38 and PS39 were shown for up to 50 dwellings each – the document suggested only one site is required).



3.16 The Draft Local Plan makes provision for one allocation for 50 dwellings at Kingswood PS38 – South of Wickwar Road. The site at Wotton Road, Kingswood (ref. KIN001) was discounted by the SALA (2017) and at the Emerging Strategy Plan stage and is therefore not included as an allocation in the Draft Plan.

Sustainability appraisal of KIN001

3.17 Appendix 5 of the 2019 SA provides a sustainability appraisal of all of the site options considered in the local plan review process, including KIN001 – copied below. KIN001 is the site that is the subject of these representations, which has been given the name ‘land north of Penwood Lodge, Kingswood’ in the SALA / SA. For KIN001 we note the SA concludes the following:

- KIN001 scores well against housing, services and facilities, employment and economic growth SA objectives;
- The site has negligible effects on social inclusion, crime, vibrant communities water quality, climate change and waste;
- There are uncertain effects against biodiversity/geodiversity;

- Mixed effect against health (ie -/+), but we note that the SA commentary describes the site as being more than 800m from a walking path but the site actually contains a public right of way, linking directly with the wider PROW network, and the site is also very likely to contain some public open space, therefore, the performance should actually be -/+;
- There are negative effects against air quality and efficient land use (although the allocated site PS38 has exactly the same negative performance against these objectives hence, this would apply to all sites within Kingswood); and
- There is negative performance against the landscape/townscape objective and the historic environment objective.

KIN001: Land north of Pennwood Lodge, Kingswood

SA Objective	Score	Justification
SA 1: Housing	+	This site has capacity for 131 homes.
SA 2: Health	-/+	The site is not located within 800m of a GP. The site is located within 800m of a council play area, a green space and a protected outdoor playspace. The site is not located within 400m of a walking or cycle path.
SA 3: Social inclusion	0	Residential site options will all have negligible effects on this objective.
SA 4: Crime	0	Residential site options will all have negligible effects on this objective.
SA 5: Vibrant communities	0	This site is on greenfield land.
SA 6: Services and facilities	+	This site is at a tier 3a settlement.
SA 7: Biodiversity/geodiversity	-?	The site is not within 1km of an internationally or nationally designated site. It is also not within 3km of Rodborough Common SAC or within 7.7km of the Severn Estuary SAC/SPA/Ramsar site. The site is however located within 250m of Nind Trout Farm and Ozleworth Brook KWS.
SA 8: Landscapes/townscapes	--?	This site is in an area which was rated in the Landscape Sensitivity Assessment as being of high/medium sensitivity to residential development. It is not within the Cotswolds AONB but is within 500m of the AONB.
SA 9: Historic environment	-	This site scored 2 in the SALA heritage assessment.
SA 10: Air quality.	--	The site scored 81 in the Stroud SALA Transport Accessibility Assessment.
SA 11: Water quality	0	The site is not within a Drinking Water Safeguarding Zone or a Source Protection Zone.
SA 12: Flooding	-	The site is on greenfield land outside of flood zones 3a and 3b.
SA 13: Efficient land use	--?	The site is relatively small in size and on greenfield land. The site is within an area of Grade 3 agricultural land.
SA 14: Climate change	0	Residential site options will all have negligible effects on this objective.
SA 15: Waste	0	This site is on greenfield land.
SA 16: Employment	+	The site is located within 600m of key employment sites (Abbey Mill Industrial Area; Orchestra Works) but is not at a Tier 1 or 2 settlement.
SA 17: Economic growth	++?	The site is located within 800m of at least one existing primary school and at least one existing secondary school.

3.18 In respect of landscape impacts, the SA states:

“The site is in an area which was rated in the Landscape Sensitivity Assessment as being of high/medium sensitivity to residential development. It is not within the Cotswolds AONB but is within 500m of the AONB”.

3.19 However, with regards to the Stroud Landscape Sensitivity Assessment (LSA 2016), we note that the LSA identified an area much larger than the Wotton Road site which spreads much further south and eastwards, beyond our site, and includes land prone to flooding.

3.20 LVIA Ltd has undertaken a Landscape and Visual Study of the site on behalf of Vistry Homes and this can be found in appendix 2. This finds that the landform within the site is gently undulating and sits within a relatively flat surrounding landscape. The landform becomes more steeply sloping beyond the site, further to the north and east in particular. Due to the nature of the boundary vegetation, the proximity of existing development in the surrounding landscape and the gently undulating local topography, views into the site are somewhat limited.

3.21 From the wider landscape to the north and east where the landform rises, the relative elevation allows some views towards the site, but these are seen in the context of the existing built elements of the settlement of Kingswood. The boundary of the Cotswold Area of Outstanding Natural Beauty (AONB) sits approximately 0.5km to the north and east of the site. Viewpoint 7 (full details in appendix 2) illustrates a representative view of the site and its context from within the AONB.

Viewpoint 7 – Nind Lane at access to PRow



3.22 From the raised landform to the north and east, the existing settlement is seen in the landscape as built elements set with mature vegetation. Residential development at the site would be partly

seen from the raised landform at the edge of and context with the existing settlement and would not appear to extend further north into the countryside due to the existing Katharine Lady Berkeley's school and other built elements.

3.23 The Wotton Road, Kingswood site is free of designations and is not considered to be of high landscape sensitivity as reported in the SALA as its enclosed by mature hedgerows, has a suburban fringe context and sits within a relatively flat surrounding landscape. Local views into the site are limited and whilst the relative elevation from the wider landscape to the north and east where the landform rises allows some views towards the site, these are seen in the context of the existing built elements of the settlement of Kingswood.

3.24 Potential impacts on the landscape can be mitigated and the Landscape and Visual Study recommends the following landscape/green infrastructure principles are applied to successfully accommodate residential development within the site:

- Create a strong green infrastructure framework including green fingers running from the northern to the southern boundary to soften and break up the built form;
- Manage and enhance existing boundary vegetation to limit potential views from existing PRoW network;
- Create a buffer between the site and the landscape to the north comprising native species and a green buffer/corridor, with lower density development along the northern and eastern boundaries;
- New planting within the site to include suitable ornamental and native species that are in keeping with the character of the area and enhance biodiversity; and
- Street tree planting throughout the site which will mature to soften the appearance of residential development.

3.25 In respect of heritage impacts the SA cites that the site scored '2' in the SALA Heritage Impact Appraisals and gives the site an overall negative performance against the SA objective 'historic environment'. The SALA Heritage Appraisal concludes the following for the Wotton Road site:

“Some impact on heritage interest. Although the site itself lies outside the Kingswood conservation area and contains no obvious features of heritage interest, it is flanked by two Grade II listed buildings (Kingswood House to the north and Penn House to the south). The site contributes to the setting of Kingswood House in particular, which derives much of its character from its rural setting and stand-alone situation on Wotton Road”.

3.26 We highlight here the Stroud Heritage Impact Appraisal’s scoring method which is as follows:

1 = no significant heritage constraints (minimal or very low sensitivity); 2 = some impact on heritage constraints (moderate sensitivity); 3 = significant heritage constraints (medium-high sensitivity); and 4 = very significant heritage constraints (highly sensitive).

3.27 Therefore, the study considers there could be ‘some impact on heritage constraints’ in respect of the Wotton Road site but these are not significant heritage constraints. We also note that a detailed mitigation strategy would be prepared to ensure that there were not any unacceptable impacts on heritage assets.

Summary

3.28 The proposed strategy for the Wotton Cluster will support very limited housing growth in the area, which could impact on localised housing supply/house prices, services and facilities and vibrancy. The SA report has completely overlooked the potential negative effects of the proposed strategy for the Wotton Cluster on these social objectives which is a considerable omission on the part of the Appraisal – implications of the appraisal should have been highlighted to decision makers.

3.29 We continue to take the view that the SA took a very broad brush approach to the appraisal of options at the Emerging Strategy stage which concludes that the highest levels of concentration (option 1) performed well against most of the SA objectives compared with option 2 (some dispersal) which was considered to perform less well. This suggests that very high level assumptions have been applied without any geographical / spatial considerations in terms of SA performance across different parts of the plan area – such that this high level analysis has overlooked the negative social impacts of concentration on the key Wotton cluster settlements.

4.0 POLICY CP2 – SITE ALLOCATIONS AND DELIVERY

New settlements

4.1 The Draft Local Plan directs a total of 4,200 dwellings to Sharpness and Wisloe as follows:

- Sharpness docks and Sharpness garden village – 2,700 dwellings and 17 ha of employment;
- Wisloe – 1,500 dwellings by 2040 and 5 ha of mixed use and employment.

4.2 In 2017, the Sharpness site was assessed in the SALA which highlighted some significant constraints relating to the site currently being in many different ownerships, the SAC/SPA/RAMSAR close to the site and high landscape sensitivity in parts and the need for a wider development strategy for the area. The Draft Local Plan is relatively silent on these matters suggesting there is considerable work to be done in drawing up and agreeing a masterplan before applications can be considered. Therefore, applications could be some way off.

4.3 Even if the new Local Plan is adopted early 2022 and a masterplan for Newtown/Sharpness has been worked up simultaneously and agreed with the LPA by this point, it would take at least a year to prepare the outline application and 18 months for it to be determined and the section 106 agreement signed, taking us to the summer of 2024. The first reserved matters applications would not be expected until circa 8 months after that, following by a further 12 months for the reserved matters application to be determined and pre-commencement conditions to be discharged, and a further 6 months for site preparation, taking us to autumn 2026. Therefore, completions would not be expected to start until autumn 2026. With 13.5 years left to run on the 20 year plan period to 2040, even with 2 outlets operating across the various Newtown/Sharpness sites, delivering 100 dwellings per annum, this would only yield 1,350 dwellings. Two outlets could be considered to be optimistic for a relatively untested housing market location, coupled with the fact that redevelopment of the Sharpness Docks is also anticipated to be delivering units in this same timeframe, thus potentially reducing the number of viable outlets / annual dwelling output on the Newtown/Sharpness site.

4.4 The delivery of 1,350 dwellings over the period 2026 - 2040 is 1,050 dwellings short of the delivery target of 2,400 dwellings set out in policy CP2 of the Draft Local Plan for Newtown/Sharpness, highlighting the need for additional sites to be allocated elsewhere.

- 4.5 Given that the new settlement of Wisloe is only circa 4 miles away (as the crow flies) from Newtown/Sharpness, and the Plan is also relying on high delivery rates of circa 110 dwellings per annum from 2026/27 to achieve 1,500 dwellings at Wisloe by 2040, this also highlights the unrealistically high delivery rates of the 2 new settlements both within a similar travel to work area and thus competing within a potentially very similar housing market.

Reserve allocations

- 4.6 Page 29 of the Draft Local Plan recognises the delivery rates required in the new plan are above what has been achieved historically and coupled with the allocation of complex brownfield sites and 2 new settlements, in the words of the Draft Local Plan itself, this is 'an ambitious undertaking'. It recognises the advantages of identifying reserve sites, and we note that Kingswood is a sustainable settlement that could accommodate reserve allocations to counter the very concentrated approach to development at the largest towns and over-reliance on the new towns which are unlikely to yield dwellings at the rates projected. In order to be flexible, additional land should be identified at Kingswood.

Summary

- 4.7 Whilst we generally support the principle of a 'hybrid' strategy, the strategy as currently drafted is too concentrated on the larger towns and over-reliant on large strategic sites that will not deliver the required number of dwellings in the plan period. Land at Wotton Road, Kingswood is suitable, available and achievable and should be allocated to contribute to the delivery of housing in the district, and to address the needs and vision of the Wotton Cluster.

5.0 CONCLUSION

- 5.1 Land at Wotton Road is located on the northern edge of Kingswood in a suburban fringe context and is free of designations. The site sits within a relatively flat surrounding landscape. Local views into the site are limited and whilst the relative elevation from the wider landscape to the north and east where the landform rises allows some views towards the site, these are seen in the context of the existing built elements of the settlement of Kingswood.
- 5.2 The site is suitable, available and achievable and has potential for circa 100 – 120 dwellings.
- 5.3 Overall, Kingswood has 'very good' accessibility to local services and facilities as well as some strategic facilities (secondary school and sports centre) within walking distance of the village and therefore, Kingswood should be reclassified as a tier 2 settlement in the new Stroud Local Plan. It also has good access to a variety of employment close by (including 2 employment areas, plus nearby Renishaw), and has a jobs surplus, acting as an employment hub.
- 5.4 Wotton-under-Edge is just 1km from the site at Wotton Road, Kingswood, which also has a library, doctor's surgery and a bank and a wide variety of retail and leisure facilities associated with its town centre status.
- 5.5 Whilst the Wotton Road site is located on the edge of Kingswood, close to available employment, schools and other facilities in the village, it is also well related to Wotton-under-Edge and its extensive services. Together the two settlements act as a cluster. Wotton-under-Edge is affected by a number of environmental constraints that prevent further growth of the town and land at Wotton Road, Kingswood could make a contribution towards the growth needs of Kingswood and Wotton-under-Edge.
- 5.6 Whilst we generally support the principle of a 'hybrid' strategy, the development strategy as currently drafted is too concentrated on the large towns and over-reliant on large strategic sites that will not deliver the required number of dwellings in the plan period. Additional sites will need to be allocated in the Plan to ensure that the district's housing requirement is met.
- 5.7 The development strategy directs just 50 additional dwellings to the Wotton cluster at Kingswood and the SA has not highlighted the negative performance against social objectives of constraining growth in the Wotton Cluster which is a significant omission.

- 5.8 Kingswood is a sustainable location for growth and should have tier 2 status. Land at Wotton Road, Kingswood is suitable for residential development and should be allocated for around 120 dwellings in the new Stroud Local Plan.

Appendix A

Appendix 1:

Table 5: Relative levels of community services and facilities available at each settlement (2018 audit)

	Healthcare					Financial				Education					Recreation and cultural facilities								Transport [†]			STRATEGIC provision	LOCAL provision	Current classification in the 2015 Local Plan Settlement Hierarchy						
	Hospital / A&E / Minor Injuries Unit	GP, Doctors surgery, Health centre (NHS)	Pharmacy, dispensing chemist	Dentist (NHS)	LOCAL total score	STRATEGIC total score	Bank / Building Society (* = mobile / part time)	Post Office (* = mobile / part time)	LOCAL total score	Secondary school	6 th Form	Further Education College	STRATEGIC total score	Primary school	Pre-school playgroup or nursery	LOCAL total score	Library (in a building)	Opera or theatre (permanent)	Swimming pool (public access)	Sports / leisure centre **	STRATEGIC total score	Place of worship	Village hall / event space / community centre	Pub	Playing field / sports pitch				Childrens play area (equipped playground)	LOCAL total score	Railway station	Petrol filling station	Transport total score	
Stroud	yes	✓	yes	yes	yes	✓✓✓	yes	✓	yes	✓	yes	yes	yes	✓✓✓	yes	yes	✓✓	yes	yes	yes	✓✓✓	yes	yes	yes	yes	yes	✓✓✓✓	yes	yes	✓✓	10	12	Tier 1	
Dursley	yes	✓	yes	yes	yes	✓✓✓	yes	✓	yes	✓	yes	yes	0	✓✓	yes	yes	✓✓	yes	0	yes	yes	✓✓✓	yes	yes	yes	yes	✓✓✓✓	0	yes	✓	7	12	Tier 1	
Wotton Under Edge	0	0	yes	yes	yes	✓✓✓	yes	✓	yes	✓	yes	yes	0	✓✓	yes	yes	✓✓	yes	yes	yes	✓✓✓	yes	yes	yes	yes	yes	✓✓✓✓	0	yes	✓	7	12	Tier 2	
Stonehouse	0	0	yes	yes	yes	✓✓✓	yes	✓	yes	✓	yes	0	0	✓	yes	yes	✓✓	yes	0	0	✓	yes	yes	yes	yes	yes	✓✓✓✓	yes	yes	✓✓	5	12	Tier 1	
Berkeley	0	0	yes	yes	0	✓✓	yes	✓	yes	✓	0	0	yes	✓	yes	0	✓	yes	0	yes	0	✓✓	yes	yes	yes	yes	yes	✓✓✓✓	0	0	0	4	9	Tier 2
Nailsworth	0	0	yes	yes	yes	✓✓✓	yes	✓	yes	✓	0	0	0	0	yes	yes	✓✓	yes	0	0	0	✓	yes	yes	yes	yes	✓✓✓✓	0	yes	✓	2	12	Tier 2	
Manor Village (Bussage)	0	0	yes	yes	0	✓✓	0	0	0	0	yes	0	0	✓	yes	0	✓	0	0	0	yes	✓	0	yes	0	yes	✓✓✓	0	yes	✓	2	7	Tier 3	
Cam	0	0	yes	yes	yes	✓✓✓	0	0	yes	✓	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	yes	yes	✓✓	1	12	Tier 1	
Minchinhampton	0	0	yes	yes	yes	✓✓✓	0	0	yes	✓	0	0	0	0	yes	yes	✓✓	yes	0	0	0	✓	yes	yes	0	yes	yes	✓✓✓✓	0	0	0	1	10	Tier 2
Painswick	0	0	yes	yes	0	✓✓	0	0	*	✓	0	0	0	0	yes	yes	✓✓	yes	0	0	0	✓	yes	yes	yes	yes	✓✓✓✓	0	0	0	1	10	Tier 3	
Bisley	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	yes	✓	0	9	Tier 3	
Eastington (Alkerton)	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	yes	✓	0	9	Tier 3	
Frampton on Severn	0	0	yes	0	0	✓	0	0	yes	✓	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	9	Tier 2	
Uley	0	0	yes	0	0	✓	0	0	yes	✓	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	9	Tier 3	
Kings Stanley	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	8	Tier 3	
Brimscombe	0	0	0	0	0	0	0	*	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	8	Tier 3	
Chalford	0	0	0	0	0	0	0	*	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	8	Tier 3	
Kingswood	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	8	Tier 3	
Newtown & Sharpness	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	8	Tier 3	
North Nibley	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	8	Tier 3	
Upton St Leonards	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	8	Tier 3	
Coaley	0	0	0	0	0	0	0	0	0	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	7	Tier 3	
Hardwicke	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	7	Tier 3
Horsley	0	0	0	0	0	0	0	0	0	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	7	Tier 3
North Woodchester	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	0	✓✓✓✓	0	0	0	0	7	Tier 3	
Oakridge Lynch	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	0	✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	7	Tier 3	
Whiteshill & Ruscombe	0	0	0	0	0	0	0	0	0	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	7	Tier 3	
Miserden	0	0	0	0	0	0	0	yes	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	0	✓✓✓✓	0	0	0	0	7	None	
Leonard Stanley	0	0	0	0	0	0	0	0	0	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	yes	yes	✓✓✓✓	0	0	0	0	7	Tier 3	
Slimbridge	0	0	0	0	0	0	0	*	✓	0	0	0	0	0	yes	yes	✓✓	0	0	0	0	0	yes	yes	0	yes	✓✓✓✓	0	0	0	0	7	Tier 3	

Appendix B

KINGSWOOD,
STROUD

LANDSCAPE AND
VISUAL STUDY

for



LIN1010study



Contact Details:

LVIA Ltd.
Bellamy House
Longney
Gloucester
GL2 3SJ

tel: 07940 749051
email: jp@lvialtd.com
[www: lvialtd.com](http://www.lvialtd.com)

LANDSCAPE AND VISUAL STUDY

Project:	Kingswood, Stroud
Status:	Final
Date:	January 2019
Author:	JPF
File Reference	PRI1000study
Revision	-

Disclaimer:

This report has been produced by LVIA Ltd within the terms of the contract with the client and taking account of the resources devoted to it by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

LVIA Ltd Registered in England No. 11704672

Contents

1.0 Introduction	1
2.0 The Site	2
3.0 Landscape and Visual Technical Note	4
4.0 Landscape and Visual Opportunities and Constraints	11
5.0 Recommended Landscape/Green Infrastructure Principles for Enhancement and Mitigation	12
6.0 Summary and Conclusions	13

1.0 Introduction

1.1.1 LVIA Ltd were instructed in January 2019 to undertake a high level landscape and visual study of a site located on the edge of the settlement of Kingswood, Stroud. This document is written to test the sites relative suitability to be considered for being brought forward for development.

1.1.2 The brief was to assess the likely landscape and visual impact of the development of the site and to identify the likely degree of change over the existing use and site conditions.

1.1.3 The field survey was carried out during January 2019, and representative viewpoints were chosen from publicly accessible vantage points to illustrate potential views into the site from the surrounding landscape.

1.1.4 The purpose of this review is to provide an initial and broad overview of the key landscape and visual considerations for the site and to provide advice on the potential suitability of the site to accommodate residential development in landscape and visual terms.

1.2 Scope of work

1.2.1 This study has been prepared by a chartered member of the Landscape Institute. The review has been based on a desktop study of relevant background information, supplemented by a visit to the site and its surroundings in January 2019.

1.2.2 Landscape and visual analysis notes are provided below, followed by an outline of opportunities and constraints for developing the site and recommended landscape/green infrastructure principles for enhancement and mitigation.

2.0 The Site

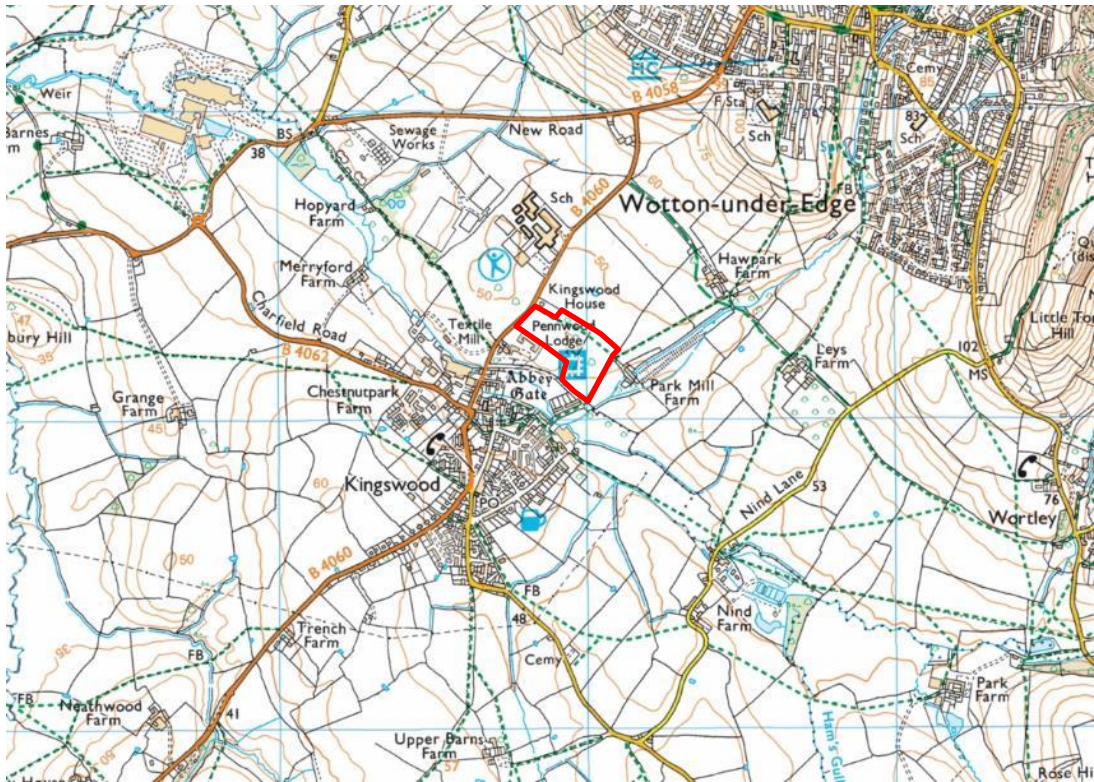


Image 1: Ordnance Survey

2.1 Landscape and Visual Overview

2.1.1 Location: The site sits to the north of Vineyard Lane and to the east of Wotton Road on the edge of the settlement of Kingswood. The site sits within no areas of designation. To the east of the site lays Park Mill Farm. Existing development lies adjacent to the site.

2.2 Openness/Enclosure

2.2.1 Hedgerows with intermittent trees form the site boundaries, which adds a sense of enclosure to the site. Further enclosure is provided by the existing development that sits around parts of the site boundary. Within the site are situated hedgerows that form field boundaries of the exiting land that is currently in agricultural use. Views are channelled along roads and are generally only short range due to the gently undulating topography in the area directly local to the site. Where the landform rises to the north and east, some further views of the site are available from the higher ground.

2.3 Perceptual Qualities

2.3.1 The site is situated in a gently undulating landscape that is populated by many hedgerows and mature trees. It sits adjacent to existing development in some places, such as Kingswood House and the retirement village to the south. Other urbanising elements such as Katharine Lady Berkeley's School sit within close proximity to the north of the site. These qualities mean that the site is perceived in a suburban fringe context. The site does not have a distinct sense of identity.

2.4 Settlement - Study Area Context

2.4.1 Within the site sit a few buildings in agricultural use set within fields defined by mature hedgerows and trees. The site sits within the northern edge of the built form of the settlement of Kingswood; an area which includes:

- The site sits approximately 0.20km to the north east of Abbey Mills Industrial Estate; and
- The site sits approximately 0.09km to the south of Katharine Lady Berkeley's School, which forms one of the northernmost urbanising elements of the settlement of Kingswood.

2.5 Landform

2.5.1 The landform within site is gently undulating and sits within a relatively flat surrounding landscape. The landform becomes more steeply sloping further to the north and east in particular

2.6 Field Pattern and Scale

2.6.1 The field pattern of the site and surrounding area comprises small to medium sized, generally regular shaped fields.

2.7 Land Cover – Study Area Context

2.7.1 The sites surrounding area comprises the built form and settlement of Kingswood and the wider landscape of settled farmland. There are fields defined by mature hedgerows with trees and mature vegetation following various watercourses within the area.

2.8 Public Rights of Way

2.8.1 The site is crossed by a public rights of way (PRoW), and a network of PRoW sit within the landscape local to the sites boundary.

3.0 Landscape and Visual Technical Note

Landscape Character

3.1.1 Natural England identifies the site as being within National Character Area 118 Bristol, Avon Valleys and Ridges. Key relevant characteristics which apply to the site or its surrounding context include:

- Agriculture is predominantly livestock rearing, with arable in the flatter land to the north-east, with larger field sizes and infrequent hedgerow trees. Valleys and steeper slopes in the south-east tend to have irregular fields and overgrown, species-rich hedges.

3.1.2 The Stroud District Landscape Assessment (2000) identifies the sites location within the Kingswood Vale Landscape Character Type. Key relevant characteristics which apply to the site or its surrounding context include:

- Mixture of pasture and arable land use.
- Alder and Willow along stream courses.

3.2 Site Features



Image 2: Aerial Photograph (showing locations of illustrative views)

3.2.1 In summary, the sites landscape features include:

- Gently undulating landform;
- Network of agricultural fields within well-defined field boundaries;
- Internal field boundary hedgerows and trees of good quality.

3.3 Visual Analysis

3.3.1 The visual survey was conducted in winter, when trees and hedgerows have lost their foliage; this represents a worst-case scenario. During summer months when vegetation has regained its foliage, denser visual barriers will be created limiting some further views of the landscape.

3.4 Local Views

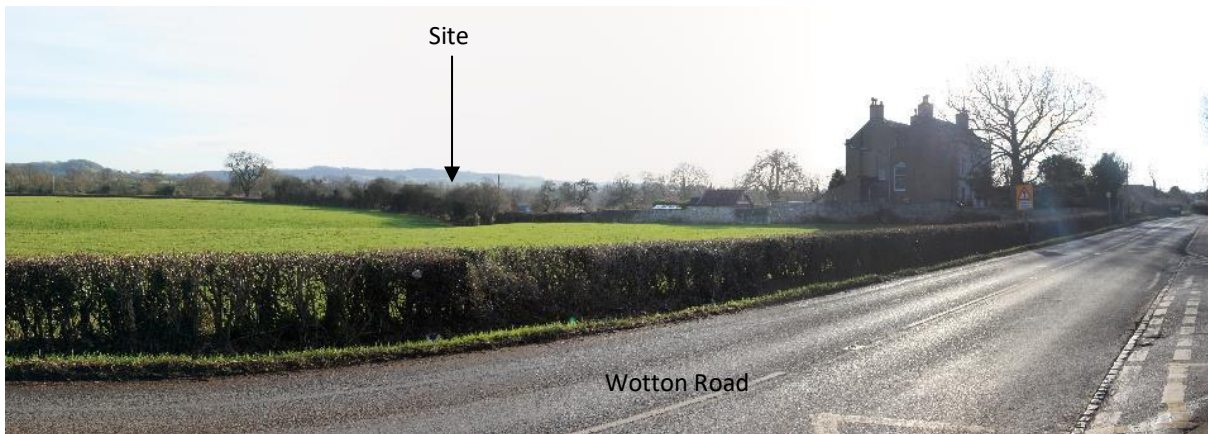
3.4.1 Due to the nature of the boundary vegetation, the proximity of existing development in the surrounding landscape and the gently undulating local topography, views into the site are somewhat limited. Partial glimpsed views into the site can be found from some locations in the landscape local to the site.

3.4.2 Due to the nature of the topography and presence of hedgerows and tree field boundaries in the surrounding landscape, the site is typically not visible from the network of PRow that sit in the wider area, although some views are available.

3.5 Medium/Longer Range Views

- 3.5.1 From the wider landscape to the north and east where the landform rises, the relative elevation allows some views towards the site, but these are seen in the context of the existing built elements of the settlement of Kingswood.
- 3.5.2 The boundary of the Cotswold Area of Outstanding Natural Beauty (AONB) sits approximately 0.5km to the north and east of the site. Viewpoint 7 illustrates a representative view of the site and its context from within the AONB.

Viewpoint 1 – At access to Katharine Lady Berkeley’s School on Wotton Road (B4060)



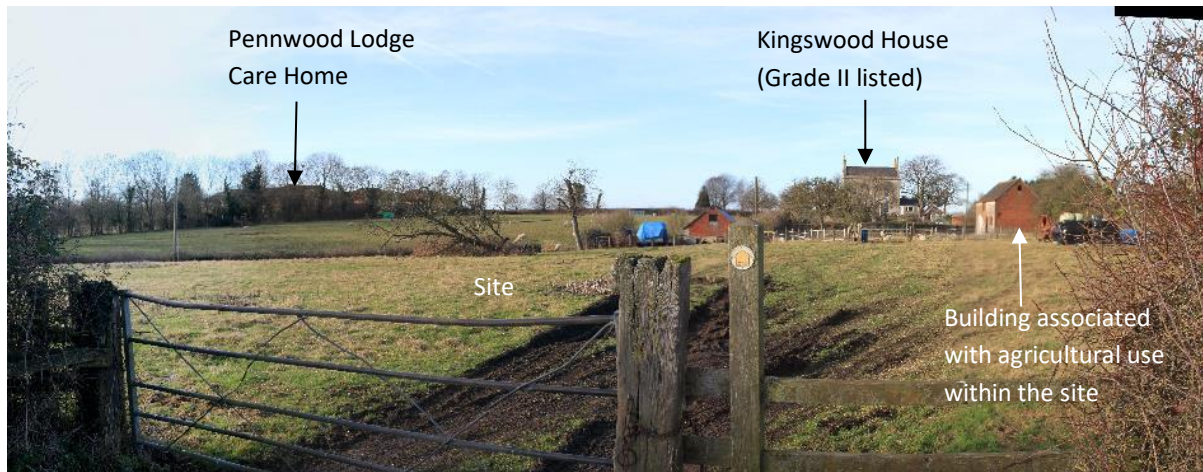
3.5.3 The northern site boundary can be seen as a dense hedgerow with intermittent trees. Some limited views are available into the site from along Wotton Road, these would mainly be available to drivers coming from the north.

Viewpoint 2 – Wotton Road (B4060) at access to PRow



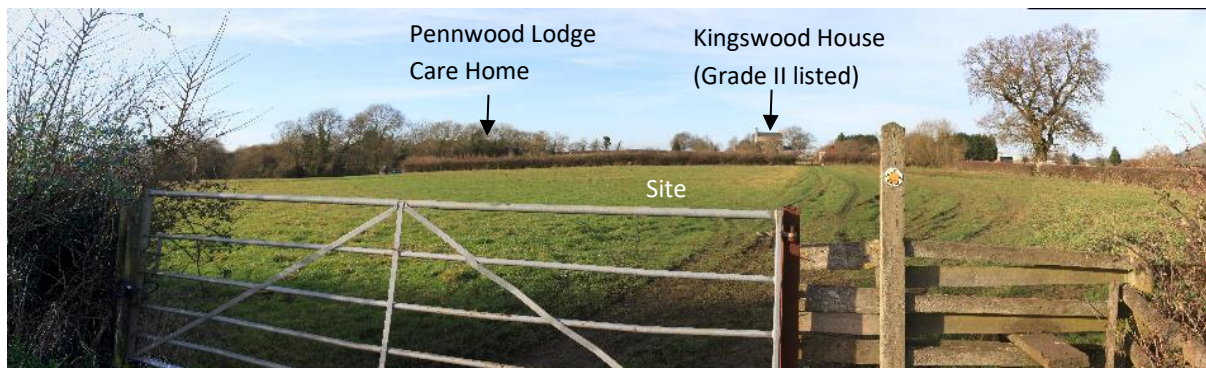
3.5.4 The western site boundary can be seen as a well-managed hedgerow that bounds Wotton Road. Some views are available into the site from along Wotton Road, these would mainly be available to drivers coming from the north. Existing built form that sits adjacent to the site can be seen.

Viewpoint 3 – PRoW within site boundary



3.5.5 A PRoW runs through the site in a broadly north west/ south east direction and this viewpoint is taken from where it crosses a field boundary, looking towards the west. The gently undulating landform can be seen, along with mature hedges and trees that bound the site and sit within it. The existing built form that sits adjacent to the site can be seen. Telegraph Poles can be seen crossing the site forming manmade elements with a vertical emphasis on the view and adding to the urbanising influences.

Viewpoint 4 – Vineyard Lane at access to PRoW



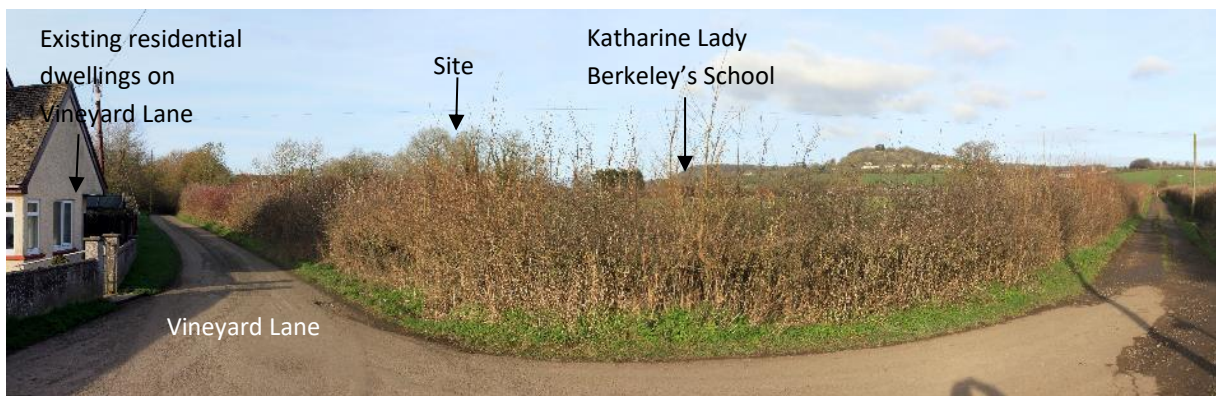
3.5.6 The eastern site boundary can be seen as a mature hedgerow that bounds Vineyard Lane. Some views are available into the site through the field gate, but other views are limited due to the hedgerow. Existing built form that sits adjacent to the site can be partly seen.

Viewpoint 5 – Bridleway accessed from Wotton Road (B4060)



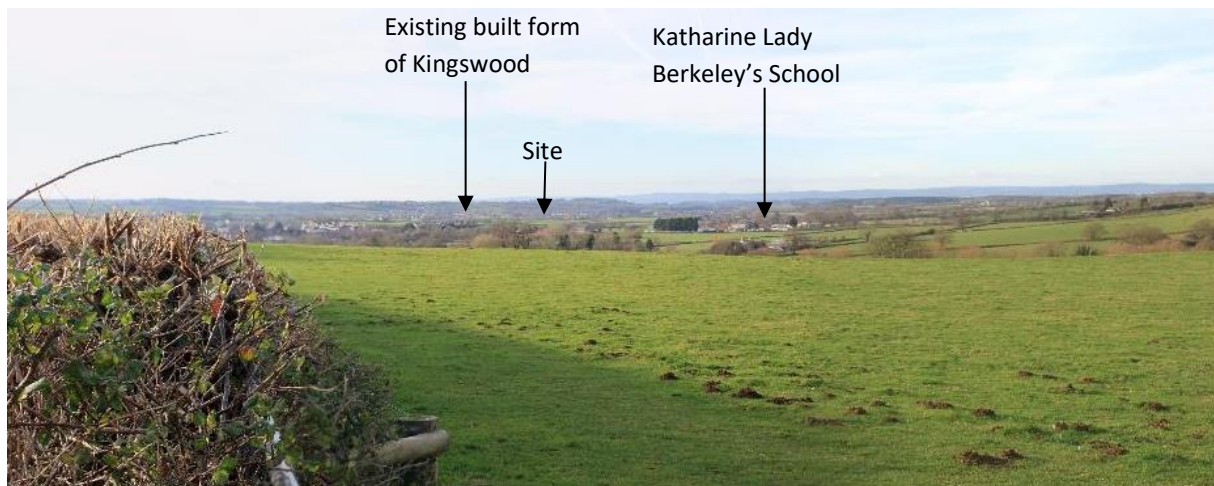
3.5.1 A wooded backcloth is created by the existing settlement of Kingwood. This viewpoint is relatively elevated in comparison to the site, which can be seen in the context of the existing built form of Kingswood that sits within mature vegetation further to the south west. Existing built form that sits adjacent to the site can be partly seen. Telegraph Poles and power lines can be seen crossing the landscape forming manmade elements with a vertical emphasis on the view and adding to the urbanising influences.

Viewpoint 6 – Vineyard Lane on route of PRoW



3.5.1 The site can be partly seen beyond the mature hedgerow that bounds it along Vineyard Lane. Existing residential dwellings and built form that sits adjacent to the site can be seen in the foreground and beyond the site to the north. Telegraph Poles and power lines can be seen crossing the landscape forming manmade elements with a vertical emphasis on the view and adding to the urbanising influences.

Viewpoint 7 – Nind Lane at access to PRoW



3.5.2 This viewpoint is relatively elevated in comparison to the site and sits within, but close to the boundary of, the Cotswold AONB. The existing built form of Kingswood that sits within mature vegetation further to the west can be partly seen, along with some longer-range views of other local settlements. Surrounding the local settlement can be seen land in agricultural use, defined by hedgerows with trees. The evergreen trees that are situated to the front of Katharine Lady Berkeley's School can be seen centrally in the view and stand out. The site however does not stand out and is difficult to see.

4.0 Landscape and Visual Opportunities and Constraints

Opportunities for residential development of the site:

- Enclosure: Hedgerows, trees, fields boundaries in the wider landscape context and existing development that surround the site provide a level of enclosure to the site and function to limit local views into the site.
- Visibility of the existing settlement: From the raised landform to the north and east, the existing settlement is seen in the landscape below as built elements set with mature vegetation. Residential development at the site would be partly seen from the raised landform at the edge of and context with the existing settlement and would not appear to extend further north into the countryside due to the existing Katharine Lady Berkeley's School and other built elements.
- Network of hedgerows and mature trees: The site and its surroundings have an inherent landscape framework which provides a relatively robust green infrastructure framework within which residential development could be accommodated and would create a similar settlement character to that of the existing settlement.

Constraints to residential development of the site

- The Cotswold AONB: Residential development would need to positively respond to the purpose and special qualities of the AONB and not cause undue harm. The Cotswold AONB Management Plan suggests that design proposals should conserve and enhance the natural beauty of the AONB and increase the understanding and enjoyment of its special qualities.
- Existing hedgerows and mature trees: Suitable offsets would be required between the landscape features and proposed development to enable long term retention where necessary.

5.0 Recommended Landscape/Green Infrastructure Principles for Enhancement and Mitigation

5.1.1 From the above landscape and visual analysis, the following landscape/green infrastructure principles are recommended to successfully accommodate residential development within the site:

- Create a strong green infrastructure framework including green fingers running from the northern to the southern boundary to soften and break up the built form;
- Manage and enhance existing boundary vegetation to limit potential views from existing PRow network;
- Create a buffer between the site and the landscape to the north comprising native species and a green buffer/corridor, with lower density development along the northern and eastern boundaries;
- New planting within site to include suitable ornamental and native species that are in keeping with the character of the area and enhance biodiversity;
- Street tree planting throughout the site which will mature to soften the appearance of residential development.

6.0 Summary and Conclusions

- 6.1.1 The site does not have a sensitive landscape context, being situated adjacent to the existing urban fringe of Kingswood and having existing development adjacent to it. The site does however sit approximately 0.5km from the boundary of the Cotswold AONB.
- 6.1.2 Landscape and green infrastructure principles have been recommended to minimise or remove potential adverse visual effects, which would contribute to the conservation or enhancement of the landscape character of the site and of the AONB.
- 6.1.3 Sensitively designed residential development, which incorporates the recommended landscape/green infrastructure principles as an integral design approach, could be successfully accommodated at the site without causing undue harm to landscape features, landscape character, the Cotswold AONB purpose and special qualities or the visual baseline.



Head Office

Bellamy House

Longney

Gloucester

GL2 3SJ

Tel: 07940 749051

Email: jp@lvialtd.com

Website: www.lvialtd.com

*** LANDSCAPE / TOWNSCAPE & VISUAL IMPACT ASSESSMENT * GREEN BELT ANALYSIS *
LANDSCAPE AUDIT * PROJECT MANAGEMENT * EXPERT WITNESS* LANDSCAPE DESIGN &
PLANNING * LANDSCAPE MANAGEMENT***