
Representations on the Stroud Emerging Strategy Paper

Land at Wotton Road, Kingswood

On Behalf of Linden Homes

January 2019

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Stroud Emerging Strategy Paper**

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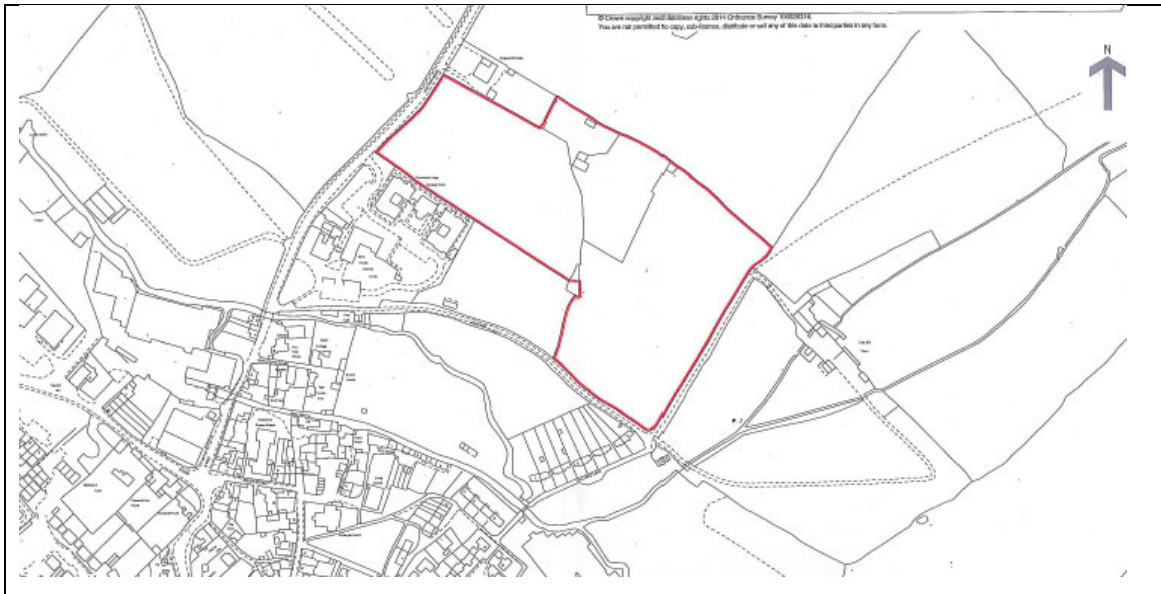
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1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Linden Homes to the Stroud Emerging Strategy Paper (ESP) 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.
- 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 provides further evidence on the sustainability of land at Wotton Road, Kingswood for up to 120 dwellings, and comments are made on the emerging issues, vision and strategic objectives of the ESP; and growth strategy and allocations, in chapters 3 and 4 respectively. A conclusion is provided in chapter 5.

2.0 LAND AT WOTTON ROAD, KINGSWOOD

Kingswood: sustainable settlement

2.1 The ESP classifies Kingswood as a tier 3a¹ settlement, described as follows:

“These medium-sized and large settlements are generally well-connected and accessible places, which benefit from their proximity to higher order settlements and / or good transport routes.... These settlements generally lack any “strategic” role or function but they all provide a good range of local services and facilities for the community” (ESP, page 40).

2.2 The Stroud District Council Settlement Role and Function Study (2014) is being updated but the update is not currently available as part of the ESP consultation. Nevertheless, the 2014 study is still relatively current and illuminates the sustainable attributes of Kingswood. Some of the Key findings in respect of Kingswood are summarized below.

Community services and facilities

2.3 Table 16 (page 55) of the Settlement Study (2014) – copied over page states that Kingswood has 4 of the 5 local facilities, including:

- Post Office
- Community hall
- Children’s play area / sports field
- Primary school

2.4 However, as per the Council’s services / facilities indicators chosen, it does not have a doctor’s surgery, which is typical of other tier 3a settlements, but we note that the doctor’s surgery to the south of Wotton Under Edge is only circa 1km from the site. We also note that in addition to the services and facilities surveyed, Kingswood also has a pub, local shop, pre-school and a church.

¹ Tier 1 are the largest settlements in the District (i.e. Stroud, Cam, Dursley and Stonehouse); tier 2 are relatively large settlements some of which have a strategic role serving a district wide / wider-than-local catchment (Berkley, Minchinhampton, Nailsworth, Painswick and Wotton-under Edge). Tier 3a settlements include Brimscombe and Thrupp; Chalford; Eastington; Frampton-on-Severn; Hardwicke; Kings Stanley; Kingswood; Leonard Stanley; Manor Village; Newtown and Sharpness; North Woodchester; and Whitminster.

Table 16: Level of community services and facilities provided by each settlement

Settlements In the Hierarchy (CP3)	"Strategic" facilities *						"Local" facilities *					Strategic service provision score	Local service provision score
	Bank / building society	Hospital	Secondary school	Library (in a building)	Sports centre or swimming pool	Railway station	Post Office	Community Hall	Children's play area or sports field	Primary school or nursery	Doctors surgery		
Stroud	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Stroud (Rodborough)	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	6	5
Stroud (Cainscross)	✗	✗	✓	✗	✓	✗	✓	✓	✓	✓	✗		
Stonehouse	✓	✗	✓	✓	✗	✓	✓	✓	✓	✓	✓	4	5
Cam	✗	✗	✗	✗	✗	✓	✓	✓	✓	✓	✓	1	5
Dursley	✓	✓	✓	✗	✓	✗	✓	✓	✓	✓	✓	5	5
Berkeley	✓	✗	✗	✓	✗	✗	✓	✓	✓	✓	✓	2	5
Wotton Under Edge	✓	✗	✓	✓	✓	✗	✓	✓	✓	✓	✓	4	5
Nailsworth	✓	✗	✗	✓	✓	✗	✓	✓	✓	✓	✓	3	5
Minchinhampton	✗	✗	✗	✓	✗	✗	✓	✓	✓	✓	✓	1	5
Frampton on Severn	✗	✗	✗	✓	✗	✗	✓	✓	✓	✓	✓	1	5
Amberley	✗	✗	✗	✗	✗	✗	✓	✓	✗	✓	✗	0	3
Bisley	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Brimscombe	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Chalford	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Coaley	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Eastington	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Hardwicke	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Horsley	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Kingswood	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Kings Stanley	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Leonard Stanley	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Manor Village	✗	✗	✓	✗	✗	✗	✗	✗	✓	✓	✓	1	3
Newtown & Sharpness	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
North Nibley	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
North Woodchester	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Oakridge Lynch	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Painswick	✗	✗	✗	✓	✓	✗	✓	✓	✓	✓	✓	2	5
Slimbridge	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Uley	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	0	4
Upton St Leonards	✗	✗	✗	✗	✓	✗	✓	✓	✓	✓	✗	1	4
Whiteshill & Ruscombe	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Whitminster	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4

* Source: Stroud District Rural Settlement Classification Topic Paper (Update 2013)

2.5 For strategic facilities, table 16 of the Settlement Study (2014) states that Kingswood has no sports centre and no secondary school but these are located in open countryside, just 350 and 500m from the current edge of the Kingswood boundary respectively. The parish boundary is very tightly drawn to the North of Kingswood and thus whilst these strategic facilities do fall within Wotton-under-Edge parish (but well beyond the settlement limits of Wotton-under-Edge), good planning should not be driven by an arbitrary parish boundary but by genuine accessibility. Therefore, in summary, the site is within 500m of a secondary school (Katharine Lady Berkeley’s School) and sports centre (immediately next to the secondary school), both of which are actually closer to the settlement of

Kingswood than Wotton-under-Edge, despite it falling within the Wotton-under-Edge parish – see map below.



- 2.6 The 2018 Settlement Study update needs to reflect this in its review of services and facilities for Kingswood which in addition to those currently listed, is also within walking distance a secondary school and sports centre. This would provide 2 strategic facilities for Kingswood demonstrating its superior accessibility as a tier 3a settlement, and actually performing more closely to a tier 2 settlement.
- 2.7 This is demonstrated in table 17 of the Settlement Study (2014) which looks at accessibility based on distance, rather than settlement limits. This shows that Kingswood has 'good' overall accessibility, as one of the highest performing 3a villages (along with North Woodchester), very closely behind Wotton-under-Edge (tier 2) – see table over page.

Table 17: Accessibility to services and facilities (Derived from MAIDeN Accessibility Matrix 2012)

Settlements in the Hierarchy (CP3) *	Market town		Minor Injury unit		Doctor		Pharmacy		Primary school		6 th form		Further education college		Branded supermarket		Post Office		Overall accessibility score (sum of all the average scores for the different categories)	
	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		
Stroud	0.2	0.0	0.6	0.4	0.1	0.0	0.0	0.0	0.0	0.0	0.4	0.1	0.3	0.1	0.0	0.0	0.0	0.0	2.4	BEST
Cam	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0	4.1	V. GOOD
Dursley	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	2.0	2.0	0.0	0.0	0.0	0.0	5.0	V.GOOD
Whiteshill & Ruscombe	1.0	0.8	1.8	1.0	0.8	0.0	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.0	V.GOOD
North Woodchester	0.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.5	0.5	1.0	1.0	0.0	0.0	0.0	0.0	7.0	GOOD
Uley	1.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.7	2.0	2.0	0.0	0.0	0.0	0.0	7.0	GOOD
Stonehouse	0.2	0.0	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	1.0	1.0	1.3	0.0	0.0	0.0	0.0	8.1	GOOD
Wotton Under Edge	0.0	0.0	2.7	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.0	2.6	2.0	0.0	0.0	0.0	0.0	9.1	GOOD
Kingswood	0.0	0.0	3.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	3.0	2.0	0.0	0.0	0.0	0.0	9.3	GOOD
Painswick	1.0	1.0	1.0	1.0	0.2	0.0	0.0	0.0	0.0	0.0	1.0	1.0	0.2	1.0	1.0	1.0	0.0	0.0	9.4	GOOD
Amberley	0.5	0.0	2.0	1.0	1.0	0.5	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	0.5	0.0	0.0	0.0	9.5	GOOD

Settlements in the Hierarchy (CP3) *	Market town		Minor Injury unit		Doctor		Pharmacy		Primary school		6 th form		Further education college		Branded supermarket		Post Office		Overall accessibility score (sum of all the average scores for the different categories)	
	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		
Nailsworth	0.0	0.0	2.0	1.9	0.0	0.0	0.0	0.0	0.1	0.0	1.0	1.9	1.3	2.0	0.0	0.0	0.0	0.0	10.3	FAIR
Brimacombe	1.0	1.0	1.0	1.0	1.0	0.0	1.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	0.0	0.3	0.0	0.0	10.3	FAIR
Hardwicke	1.2	1.1	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.7	1.0	1.0	0.4	0.0	0.0	0.0	10.7	FAIR
Upton St Leonards	1.7	1.0	2.0	1.0	0.3	0.0	0.3	0.0	0.0	0.0	1.0	0.0	2.0	1.0	0.3	0.0	0.0	0.0	10.7	FAIR
Horsley	1.0	0.0	2.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	2.0	2.0	0.0	0.0	0.0	0.0	11.0	FAIR
North Nibley	0.0	0.0	2.0	1.0	1.0	0.0	1.0	0.0	0.0	0.0	1.0	0.0	2.0	2.0	1.0	0.0	0.0	0.0	11.0	FAIR
Manor Village	1.1	2.0	1.2	1.8	0.0	0.0	0.0	0.0	0.0	0.0	1.0	2.0	1.0	1.4	0.0	0.0	0.1	0.0	11.6	FAIR
Kings Stanley	1.0	0.5	2.5	2.0	1.0	0.0	1.0	0.3	0.0	0.0	0.8	1.0	1.0	1.0	0.0	0.0	0.0	0.0	12.0	FAIR
Whitminster	1.0	1.0	3.0	1.0	1.0	0.0	1.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	0.5	0.0	0.0	0.0	12.5	FAIR
Leonard Stanley	1.0	0.3	2.8	2.0	1.0	0.0	1.3	0.3	0.0	0.0	1.0	1.0	1.0	1.3	0.0	0.0	0.0	0.0	12.8	FAIR
Berkeley	1.7	1.0	3.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	1.0	2.0	2.0	0.0	0.0	0.0	0.0	13.0	POOR
Chalford	1.2	1.5	1.7	1.0	0.7	0.0	0.7	0.0	0.0	0.0	1.5	2.0	1.2	1.0	0.5	0.0	0.2	0.0	13.0	POOR
Slimbridge	1.0	0.0	2.5	1.0	1.0	0.0	1.0	0.0	0.0	0.0	1.0	1.0	2.0	2.0	1.0	0.0	0.0	0.0	13.5	POOR
Eastington	1.0	1.0	3.0	2.0	1.0	0.0	1.0	1.0	0.3	0.0	1.0	1.0	1.0	2.0	0.0	0.0	0.0	0.0	15.3	POOR
Minchinhampton	1.0	1.0	3.0	1.3	0.0	0.0	0.0	0.0	0.0	0.0	1.6	2.0	1.0	1.7	2.0	0.9	0.0	0.0	15.4	POOR
Coaley	1.0	1.0	1.0	1.0	1.0	0.0	1.0	1.0	0.0	0.0	1.0	1.0	3.0	2.0	1.0	1.0	1.0	0.0	17.0	V. POOR
Bisley	1.0	1.0	3.0	1.0	2.0	0.5	2.0	0.5	0.0	0.0	1.0	2.0	1.0	1.0	2.0	0.5	0.0	0.0	18.5	V. POOR
Newtown & Sharpness	1.7	1.0	3.0	2.0	2.0	0.0	2.0	1.0	0.0	0.0	1.0	2.0	2.0	2.0	0.0	0.0	0.0	0.0	18.7	V. POOR
Frampton on Severn	2.0	1.0	3.0	2.0	0.0	0.0	2.0	1.0	0.0	0.0	2.0	1.0	2.0	2.0	2.0	0.0	0.0	0.0	20.0	V. POOR
Oakridge Lynch	2.0	1.0	3.0	1.0	2.0	1.0	2.0	1.0	0.0	0.0	2.0	2.0	2.0	1.0	2.0	1.0	0.0	0.0	23.0	WORST

Employment and travel to work

2.8 Table 17 of the Settlement Study (2014) shows Kingswood has a strong employment role. Kingswood has a working age population of 730 people, compared with 1,190 jobs available within the settlement, thus showing that Kingswood is an employment hub and net importer of employees. Wotton-under-Edge and Kingswood are found to have a high concentration of professional, scientific and technical jobs which are sectors that are forecast to see the biggest job growth.

Table 7: Settlements with a strong employment role (Census 2011)

Settlements in the Hierarchy (CP3)	Local workers:	Local jobs:	Settlements in the Hierarchy (CP3)	Is the settlement a net importer or exporter of workers? *	"Employment density" (available local jobs/available resident workers)
	Resident population (aged 16-74): Number of economically active residents (March 2011) *	Workplace population (aged 16-74): Number of people at work in each settlement (March 2011) *			
Stroud District Totals / Average :	59,980	50,092	Stroud District Totals / Average :	-9,888	0.84
Stroud	13,900	11,720	Stonehouse	+ 3,130	1.75
Stonehouse	4,150	7,280	Kingswood	+ 460	1.63
Dursley	3,510	2,420	Whitminster	+ 200	1.41
Nailsworth	3,060	2,380	North Woodchester	+ 120	1.39
Cam	4,180	1,980	Amberley	+ 100	1.38
Wotton Under Edge	2,590	1,370	Eastington	+ 50	1.06
Minchinhampton	1,530	1,350	Brimscombe	+ 70	1.06
Brimscombe	1,270	1,340	Frampton on Severn	+ 30	1.04
Hardwicke	2,400	1,230	Slimbridge	0	1.00
Kingswood	730	1,190	Upton St Leonards	- 10	0.98
Eastington	860	910	Minchinhampton	-180	0.88
Painswick	1,040	850	Stroud	-2,180	0.84
Chalford	1,500	840	Painswick	-190	0.82
Frampton on Severn	800	830	Oakridge Lynch	-70	0.82
Berkeley	1,120	810	Bisley	-50	0.81
Whitminster	490	690	Nailsworth	-680	0.78
Upton St Leonards	610	600	North Nibley	-70	0.75
Manor Village	1,590	580	Berkeley	-310	0.72
Newtown & Sharpness	780	510	Dursley	-1,090	0.69
North Woodchester	310	430	Newtown & Sharpness	-270	0.65
Slimbridge	410	410	Horsley	-80	0.62
Amberley	260	360	Chalford	-660	0.56
Kings Stanley	810	340	Uley	-260	0.56
Uley	590	330	Wotton Under Edge	-1,220	0.53
Bisley	380	310	Hardwicke	-1,170	0.51
Leonard Stanley	750	310	Coaley	-170	0.48
Whiteshill & Ruscombe	630	240	Cam	-2,200	0.47
Oakridge Lynch	270	220	Leonard Stanley	-470	0.42
North Nibley	280	210	Kings Stanley	-440	0.41
Coaley	330	160	Whiteshill & Ruscombe	-390	0.38
Horsley	210	130	Manor Village	-1,010	0.36

2.9 Workers in the Wotton-under-Edge/Kingswood/North Nibley cluster on average travel 20km to work which is very similar to the other rural clusters which range from an average of 17.2 – 23.5 km (with the exception of Hardwicke/Upton St Leonards/Hunts Grove which averages 15.3km). This compares with average distance travelled to work of circa 12.5 – 17 kms for the largest settlements of Stroud, Stonehouse, Cam and Dursley.

2.10 Para 3.4.16 of the Settlement Study concludes:

"It seems that the best performing settlements, in terms of their ability to service the employment needs of the local community are:

- **Stroud**
- **Stonehouse**
- **Nailsworth**
- **Dursley**
- **Cam**
- **Wotton Under Edge / Kingswood**
- **Brimscombe (and Thrupp)**

These settlements typically have a good proportion of workers who live locally and the type and range of jobs on offer matches the characteristics of the resident workforce quite well. However, few of these settlements fully meet the needs of their resident workforce. Stonehouse, Kingswood and Brimscombe are net importers of workers, but the other settlements all see a substantial out- flow of residents who work elsewhere”.

The site

- 2.11 The Wotton Road, Kingswood 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.
- 2.12 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.

- 2.13 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. The Stroud Heritage Impact Appraisals (2017) examined the impact of development of KIN001 on heritage assets and recorded the site as being '2 - **moderate sensitivity**'² and that the impact would be likely to preclude development on part of the site. A detailed mitigation strategy would be prepared to ensure that there were not any unacceptable impact on heritage assets.

- 2.14 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

- 2.15 The Stroud Strategic Assessment of Land Availability (SALA) prepared in 2017 and updated in 2018 has carried out an assessment of potential development sites around Kingswood. The sites are shown on page 88 of the ESP, of which two potential allocations are shown, (PS38 and PS39 for up to 50 dwellings each – the document suggests only one is required), as well as 7 alternative locations which were all discounted in the SALA. The site at Wotton Road, Kingswood (ref. KIN001) was discounted by the SALA (2017) and hence is shown as an alternative site in the ESP.
- 2.16 There is no detailed assessment of the site in the 2017 SALA but a discounted sites table states the following for KIN001:

"The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, beyond the strong valley floor boundary to the settlement and Conservation Area. Development may impact on the flood zone in the valley floor. There are therefore physical constraints and potential impacts preventing sustainable development in this location".

² 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).

- 2.17 The Stroud Landscape Sensitivity Assessment (2016) that fed into the SALA identified an area much larger than the Wotton Road, Kingswood site which spreads much further south and eastwards, beyond our site, and includes land prone to flooding.
- 2.18 LVIA Ltd has undertaken a Landscape and Visual Study of the site on behalf of Linden Homes and this can be found in appendix 1. 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.
- 2.19 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 1) illustrates a representative view of the site and its context from within the AONB.

Viewpoint 7 – Nind Lane at access to PRow



- 2.20 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.

Summary

- 2.21 Overall, Kingswood has 'good' accessibility to local services and facilities (primary school, post office, community hall, and children's play space/playing pitch – plus a pub, pre-school, church and a local shop), as well as some strategic facilities (secondary school and sports centre) within walking distance of the village. This needs to be reflected in the Settlement Study update 2018. It thus performs similarly to tier 2 settlements. It is 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.
- 2.22 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 (table 13, Settlement Study 2014).
- 2.23 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.
- 2.24 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 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.

2.25 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 EMERGING STRATEGY PAPER – ISSUES, VISION AND OBJECTIVES

Issues

3.1 The Emerging Strategy Paper (ESP) identifies 5 key issues focusing on:

- Housing in the right locations
- Conserving the countryside
- Maximising brownfield redevelopment
- Avoiding and mitigating impacts of development
- Tackling the lack of affordable housing

3.2 These are high level but prove to be very significant as the Council then goes on to identify what they will do about them on page 7 of the ESP.

3.3 We note that page 7's further explanation of the issues to be addressed by the plan makes no provision for villages / smaller settlements. Issue one (housing) indirectly deals with the larger settlements (i.e. tiers 1 and 2) and concentrating new development in these locations with greatest accessibility and infrastructure (as referred to in the first bullet point); and new settlements in the second bullet but there is no recognition of the needs and roles of villages which make up a large proportion of the district's settlements in any of the issues. The remaining 4 issues deal with affordable housing, land recycling and environmental protection (i.e. conserving the countryside and avoiding/mitigating the effects on the natural environment).

3.4 Therefore, a bullet point should be added under issue 1 as follows:

- Support the needs and sustainable growth of smaller settlements (tiers 2 and 3), particularly those that are well served by employment and other services or where they form part of a cluster of settlements providing for the needs of a wider area.

Vision

3.5 Similarly, the vision focuses on the key market towns but overlooks the villages where a large proportion of the district's population lives. The vision should be amended to include something suitably visionary and supportive of the future of villages, particularly those which provide key services and employment to those living within the village itself and surrounding villages.

Strategic objectives

3.6 Strategic objective SO3 deals with town centres and rural hinterlands but this should be extended to also refer to key villages providing vital services in rural areas. This is probably best located under SO1: Accessible Communities, with the addition of this as a final bullet point:

- Supporting villages providing vital services and employment in rural areas

4.0 GROWTH STRATEGY OPTIONS

The housing requirement

4.1 Page 16 of the ESP states:

“the Government requires the Local Plan review to provide for at least 638 new homes per year, although this may change in future as new data is published (para 1). To meet this new challenging target every year over a 20 year period will require the Local Plan Review to identify land for at least 12,800 new homes” (para 2).

4.2 Whilst the Plan sets out the current position on housing requirements and acknowledges that this figure may change, there is no explanation or background paper setting out how this requirement figure has been arrived at. Current NPPF policy requires the application of a standard method for housing which includes 3 steps:

1. setting the baseline by projecting household growth over a 10 year period using the latest national household growth projections;
2. Adjusting the baseline based on affordability;
3. Capping the level of any increase.

4.3 However, the information used at each of these stages is not set out in an evidence report which would have been useful to see and to comment on, in particular, how the cap has been applied. This will need to be rectified for the next stage of formal consultation on the Plan.

Growth strategy

4.4 Four growth options were set out at the Issues and Options stage as follows:

- Option 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).

4.5 The ESP has now set out a preferred strategy which:

- concentrates growth at Cam and Dursley, Stonehouse, and Stroud;
- identifies 2 new settlements at Sharpness and Wisloe;
- directs modest growth to local service centres;
- directs a very small amount of growth to villages with good local facilities, which includes Kingswood.

4.6 However, as currently presented, its difficult to assess the overall performance of the strategy in any detail as no settlement housing targets are provided on the key diagram on page 33 (or in a summary table) setting out the scale of growth anticipated for settlements. Information is provided in chapter 5 (Making Places) on the number and scale of housing and employment allocations, but it would be helpful to have a strategic overview of the overall scale of change (i.e. existing commitments plus new allocations) for those settlements that will be accommodating growth in the district (i.e. tier 1 – 3 settlements).

Sustainability appraisal of growth options

4.7 Page 41 of the Sustainability Appraisal Report (November 2018) presents the summary findings of the appraisal of the Issues and Options 4 growth options. This concludes that option 1 performs slightly better in terms of potential positive effects and slightly fewer negative effects than the other more dispersed options / new settlements (para 4.32). The majority of these differences appear to arise in relation to negative impacts on biodiversity (SA7); landscape/townscape (SA9); water quality (SA11); flooding (SA12); and efficient use of land for options 2 – 4, compared with option 1.

4.8 However, as specific sites making up options 1 – 4 are not known or specified, it could be equally plausible that sites can 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 environmental assets SA

objectives 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.

4.9 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.

4.10 What is noteworthy is that the SA concludes that the various options have different benefits and impacts and “therefore, it may be worth considering a hybrid option...” (para 4.33).

4.11 We support a hybrid option that includes some provision for the large villages.

Site allocations

Kingswood

4.12 The ESP intends to direct just 50 new dwellings to Kingswood over the next 20 years to 2040. This does not reflect the sustainable role it plays in the settlement hierarchy, particularly when viewed as a cluster with Wotton-under-Edge (already a tier 2 settlement with an extensive range of services and facilities) to which no additional development is to be directed. With decreasing household size, the proposed strategy for Wotton-under-Edge (i.e., no additional housing development other than small scale infill / redevelopment) could lead to population decline. Kingswood is a sustainable settlement on its own merits and the Wotton Road, Kingswood site is well related to the settlement, within walking distance of all services and facilities. The site could also provide additional development to serve the housing needs of Wotton-under-Edge, currently unaddressed in the ESP.

New settlements

4.13 The ESP directs a total of 2,770 dwellings to Newtown and Sharpness across three sites as follows:

- Sharpness docks – 300 dwellings and 7 ha of mixed use and employment;
- Land at Focus School – 70 dwellings;

- South and east of Newtown and Sharpness – up to 2,400 dwellings by 2040 and 10 ha of mixed use and employment.

4.14 In 2017, the Newtown/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 ESP 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.

4.15 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.

4.16 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 the ESP (page 81) for Newtown/Sharpness, highlighting the need for additional sites to be allocated elsewhere.

4.17 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

- 4.18 Page 35 of the ESP 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 ESP itself, the strategy is 'an ambitious undertaking'. It recognises the advantages of identifying reserve sites and 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

- 4.19 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. At least 220 dwellings should be directed to Kingswood, made up of land at Wotton Road, Kingswood (around 120 dwellings) and other allocations in sustainable locations.

5.0 CONCLUSION

- 5.1 Lane 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 'good' accessibility to local services and facilities as well as some strategic facilities (secondary school and sports centre) within walking distance of the village. This needs to be reflected in the Settlement Study update 2018 and 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 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 The ESP's issues, vision and strategic objectives have overlooked the needs of the villages, especially those well served by services and facilities (tier 2 and 3 settlements) which provide vital services for those living within the settlement and beyond. This needs to be addressed in the next stage of the Plan.
- 5.7 Whilst we generally support the principle of a 'hybrid' strategy, the ESP's 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.

- 5.8 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 1
Landscape and Visual Study

KINGSWOOD,
STROUD

LANDSCAPE AND
VISUAL STUDY

for



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LANDSCAPE AND VISUAL STUDY

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Status:	Final
Date:	January 2019
Author:	JPF
File Reference	PRI1000study
Revision	-

Disclaimer:

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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

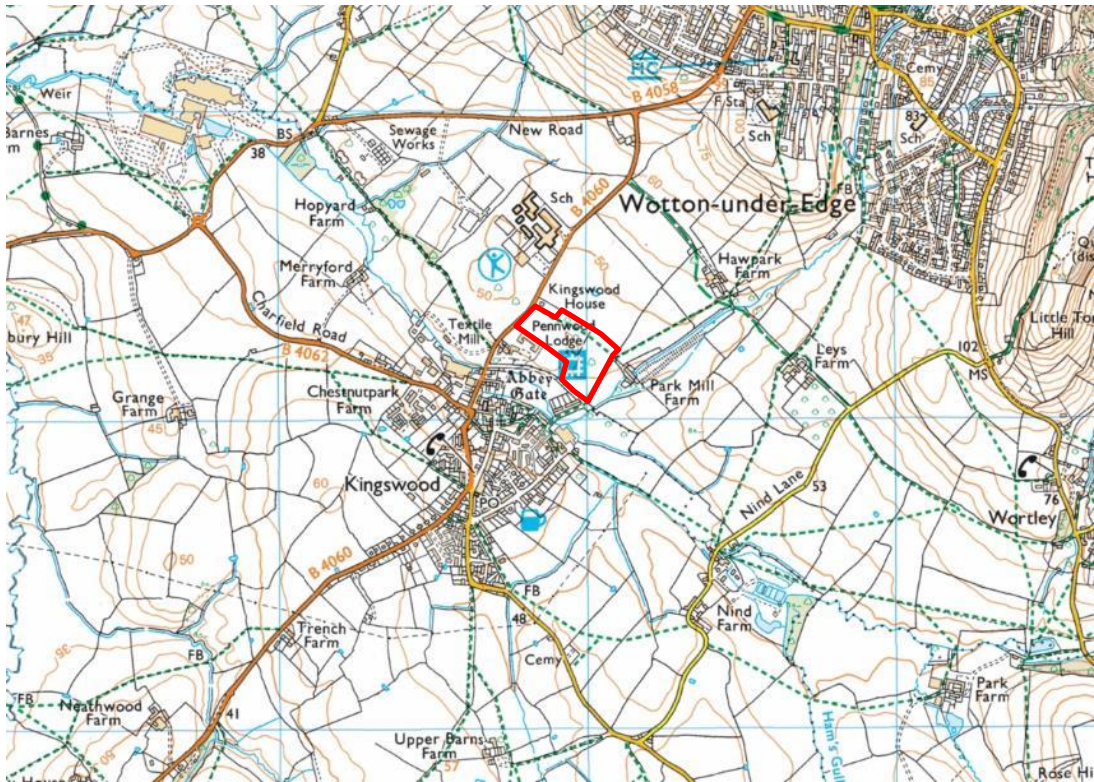


Image 1: Ordnance Survey

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

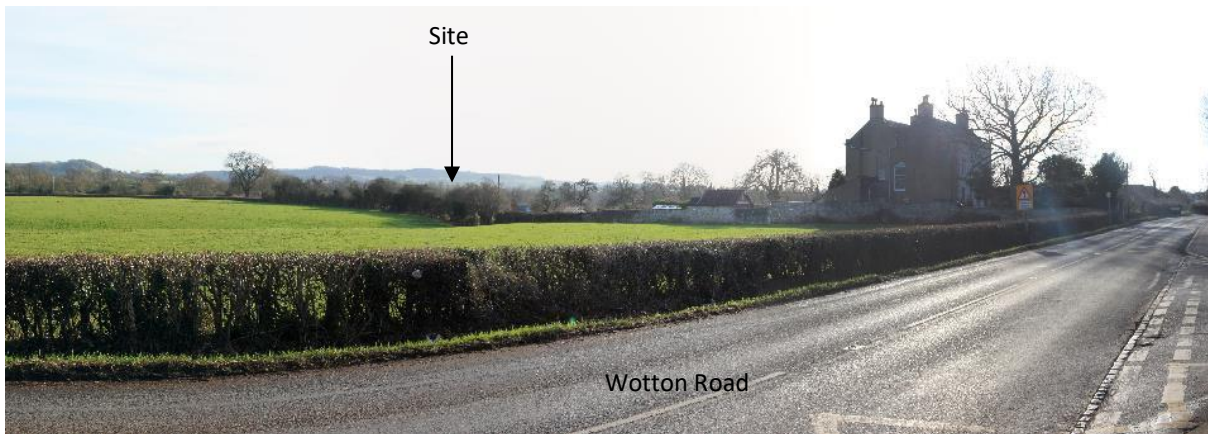
3.4.1 Due to the nature of the boundary vegetation, the proximity of existing development in the surrounding landscape and the gently undulating local topography, views into the site are somewhat limited. Partial glimpsed views into the site can be found from some locations in the landscape local to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



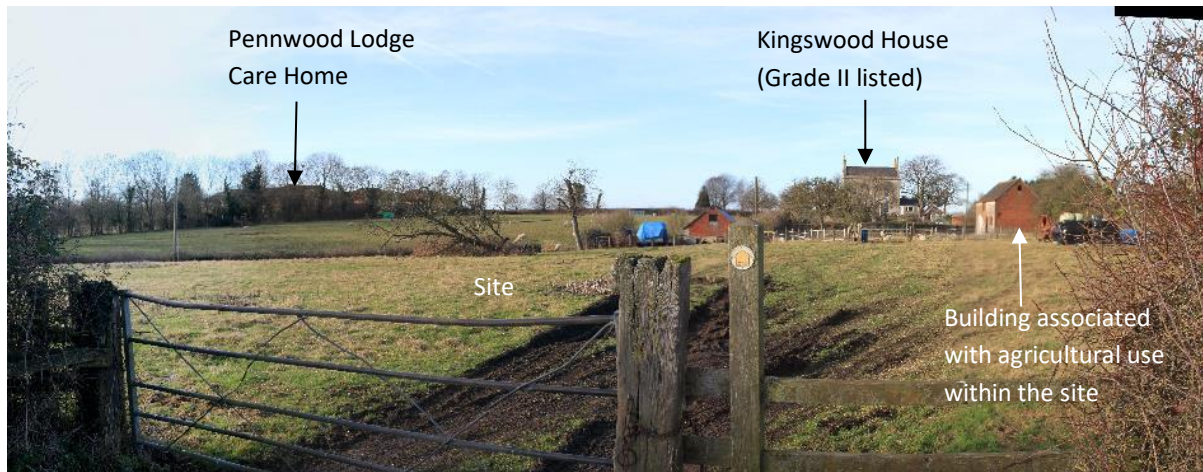
3.5.3 The northern site boundary can be seen as a dense hedgerow with intermittent trees. Some limited views are available into the site from along Wotton Road, these would mainly be available to drivers coming from the north.

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



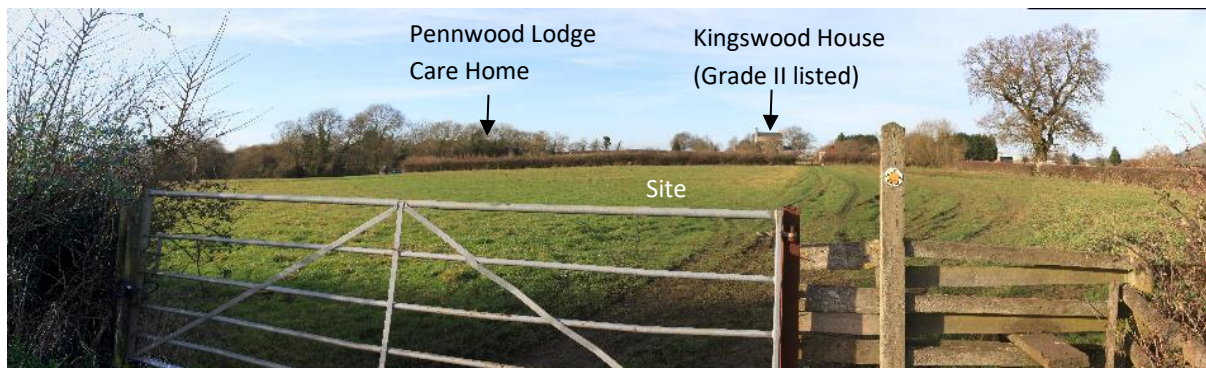
3.5.4 The western site boundary can be seen as a well-managed hedgerow that bounds Wotton Road. Some views are available into the site from along Wotton Road, these would mainly be available to drivers coming from the north. Existing built form that sits adjacent to the site can be seen.

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



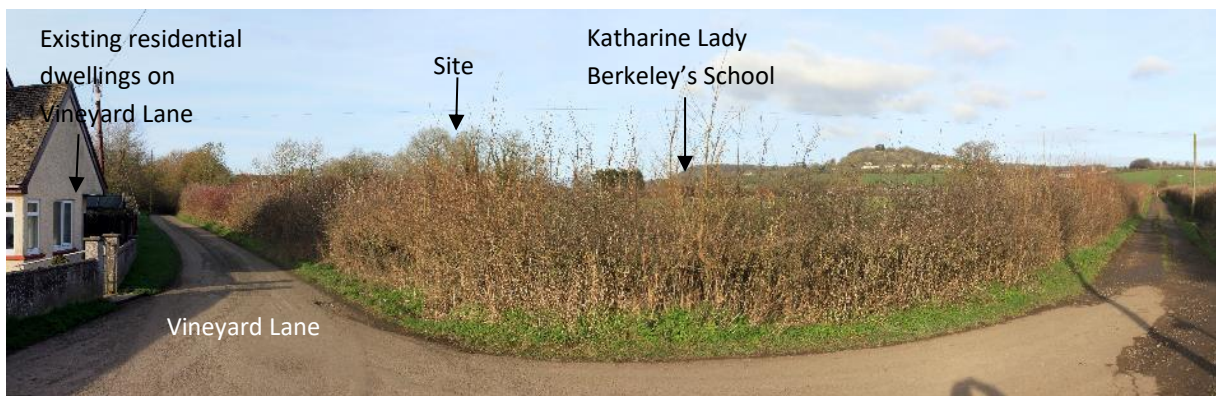
3.5.6 The eastern site boundary can be seen as a mature hedgerow that bounds Vineyard Lane. Some views are available into the site through the field gate, but other views are limited due to the hedgerow. Existing built form that sits adjacent to the site can be partly seen.

Viewpoint 5 – Bridleway accessed from Wotton Road (B4060)



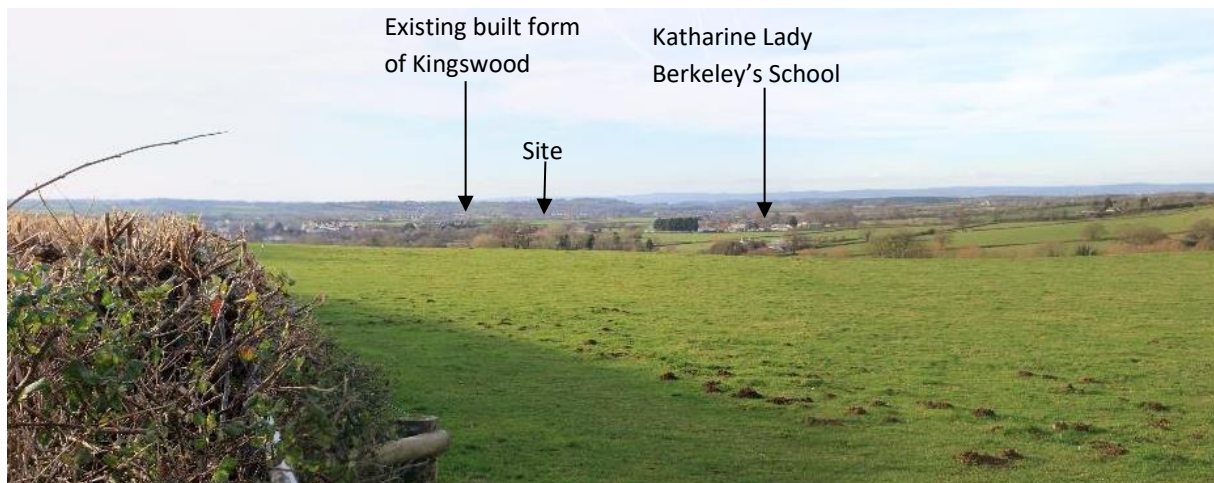
3.5.1 A wooded backcloth is created by the existing settlement of Kingwood. This viewpoint is relatively elevated in comparison to the site, which can be seen in the context of the existing built form of Kingswood that sits within mature vegetation further to the south west. Existing built form that 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.



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