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From: [REDACTED]
Sent: 03 December 2017 21:34
To: _WEB_Local Plan; _Council_Painswick Parish
Subject: The Stroud District Local Plan Review - Issues and Options Paper

Response to inclusion of site PAI004 Washwell Fields in the Stroud District Council Strategic Assessment of Land Availability (SALA) 2017

Dear Sir or Madam

We wish to object to this site being included in the SALA as being one in which residential development could be considered.

Our reasons for objecting are as follows:

1. ***There is very poor access*** to the site via Lower Washwell Lane, which is clearly what was intended by the owner in their submission document in which they refer to the access being via "Washwell Lane". This lane is narrow (for most of its length it is single track with passing spaces), has no footpath (despite it serving a large number of residential units) and has a very unsatisfactory junction with the A46, with poor visibility especially when attempting to exit the lane onto the major road. The proposed access to the site from the lane (at the southeast corner of the site) would be up a very steep bank, on a sharp bend where there is already another cul-de-sac joining the lane. There must very serious doubts that it would be possible to create an access road to the required standard (certainly not one to serve 15 houses) here. Has the SDC Planning Dept consulted highways engineers (or the County Council Highways Dept) on this important point?

2. Any development of Washwell Fields would have an ***adverse landscape impact***, an issue that I most concerned appears to have been overlooked (or misunderstood) by the SALA assessment. I am challenging the judgements that appear to have been made about the potential landscape impact of development of this site. The Landscape Sensitivity Assessment includes this site in parcel PO2. This is said to have a number of roles in landscape terms, including separating the main part of the village from The Park. However, it says (***incorrectly***) that this particular field is largely hidden from view. The SALA assessment says the site is relatively level - and this is definitely incorrect, especially at the south-eastern corner where the access would be (see above).

Site PAI005 was rejected because it was too visible in the landscape. However, PAI004 is only relatively hidden from Lower Washwell Lane: from other locations it is easily visible. The context here is very relevant. The appeal decision on application 15/1297 on 28 December 2016 identified that site as being within the Painswick and Slad Valley Character Area; and Washwell Fields is no different. Reference was made to NPPF para 115 and Local Plan policy ES7 and the Inspector took into account local, short-distance views as well as medium and long-distance views, including views from the lane and a nearby footpath. In paragraph 11 of her decision she concludes that development here would be visible and result in a change in character, despite the site being seen against the backdrop of existing development, and this was a key factor in her decision to dismiss the appeal. Exactly the same considerations apply here, with PAI004 being easily visible from Bulls Cross, Longridge and Sheepscombe, and well as from more local footpaths (e.g. at GR 871101). It should be

recalled that this decision was taken in the context of a known need for affordable housing and, moreover, resulted from the Council's own refusal of the application in the first place. NPPF115 clearly states that AONBs have the **highest status** for protection of their landscape character - and it is clear that in your prioritisation other areas or locations need to be considered first.

3. Development would have an **adverse heritage impact** - on Washwell House which is Grade II listed. The listing clearly documents that the important (main) elevation of the house is the view from the east, which is exactly where PAI004 is, rather than being from the road side (an issue that appears to have been misunderstood by the Heritage Impact Appraisal document which keeps referring to the Gyde House conservation area and Gyde Barn). The house currently enjoys undisturbed views across site PAI004 over the Painswick Valley towards Longridge and Bulls Cross, and the more recent development at the bottom of Lower Washwell Lane is not visible from Washwell House because of the sudden change in level at the eastern edge of the site. Development on site PAI004 would ruin these vistas, and therefore adversely impact the rural setting of this listed building.

4. Vandalism to historic pasture land. Although the site submission document is rather dismissive of the site as being "grass keep only", there is absolutely no need to build over land that has never previously been developed when there are other sites that could be considered.

We would be grateful if you could confirm that you have received and will consider these points.

Yours faithfully

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