

Amy Robertson
Stroud District Council
Ebley Mill
Stroud GL5 4UB



By email only to: Amy.Robertson@stroud.gov.uk and planning@stroud.gov.uk

26 February 2021

Dear Amy

APPLICATION NO: S.20/2678/FUL

DESCRIPTION: Development of 16 dwellings comprising of both open market and affordable tenure along with the provision of associated infrastructure and an ecological corridor.

LOCATION: Land To The West Of Wotton Road, North Nibley, Gloucestershire.

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located within the Cotswolds National Landscape.

The Cotswolds National Landscape is a living and working landscape in which the social and economic well-being of local communities are important considerations. As such, we recognise that the National Landscape cannot be considered exempt from the need for new housing. However, new housing should be delivered in a way that is compatible with – and positively contributes to - the statutory purpose of conserving and enhancing the natural beauty of the area.

As outlined below, we consider that the proposed development would have a significant adverse impact on this statutory purpose, including the landscape and scenic beauty. In addition, we consider that the proposed development constitutes major development in the context of paragraph 172 of the National Planning Policy Framework (NPPF). We do not consider that the proposed development would demonstrate exceptional circumstances or be in the public interest.

For these reasons the Board objects to the proposed development and recommends that planning permission should be refused.

Impacts on landscape character

The Cotswolds AONB Landscape Character Assessment¹ identifies 19 different landscape character types (LCT) within the Cotswolds National Landscape. The proposed development would be located in LCT 3 (Rolling Hills and Valleys)² and is in the setting of LCT 7 (High Wold)³.

The site of the proposed development reflects key characteristics of LCT 3, in particular the pastoral use of the area and the small-scale fields. The proposed development would have an adverse impact on these key characteristics.

¹ <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/>

² <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-3-rolling-hills-and-valleys-2016.pdf>

³ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-7-high-wold-2016.pdf>

Cotswolds Conservation Board

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

[cotswoldsaonb.org.uk](https://www.cotswoldsaonb.org.uk)

Chairman:
Brendan McCarthy
Vice Chair:
Rebecca Charley

Stroud District Council's Landscape Sensitivity Assessment⁴ identified that the land parcel that includes this site would have a high landscape sensitivity to housing use – see Appendix 1 for further details. We consider that many of the factors that contribute to this high sensitivity are applicable to the site itself. In principle, this high sensitivity makes this location unsuitable for housing,

The proposed development would be outside the 'settlement development limits' (SDL) of North Nibley. It would not be contiguous with the SDL. In fact, it would be an incongruous and obtrusive finger of development that bears no relation to the historic character and settlement pattern of North Nibley.

The proposed development of 16 dwellings would be a 9.5% increase on the 169 dwellings that were identified as being in the built-up area of North Nibley at the time of the 2011 census.⁵ This would be a significant increase for just one development in a relatively small, rural settlement. Such an increase is, arguably, disproportionate to the scale of the existing settlement.

These adverse impacts on landscape character should be given great weight, in line with paragraph 172 of the NPPF.

Visual impact

The site would be highly visible in the foreground of westward views from the Grade II* listed building, Tyndale Monument. This is particularly significant given the change that would take place in this view, from a characteristic, pastoral landscape to an incongruous and obtrusive finger of development that is not contiguous with the existing settlement (as outlined above).

The Tyndale Monument is located on the Cotswold Way National Trail and is identified as a 360 degree viewpoint on Ordnance Survey maps, which further increases the sensitivity of these views. The Tyndale Monument is also located on the edge of LCT 7 (High Wold). The long-distance views of the High Wold are one of the 'special qualities' of the Cotswolds National Landscape. As such, these views are a key attribute on which the priorities for the area's conservation, enhancement and management should be based. These long-distance views are also one of the key characteristics / features of LCT 7.

Given the difference in elevation between the Tyndale Monument / Cotswold Way and the proposed development site, it is highly unlikely that any on-site mitigation would significantly reduce these visual impacts, including in the long term.

Based on the information outlined above, we consider that the proposed development would have a significant adverse impact on views from this highly sensitive and important viewpoint.

The proposed development would also adversely affect views from public rights of way (PROW) at the west of the site looking eastwards towards the Tyndale Monument and Nibley Knoll. For example, the proposed housing would potentially block or obscure the eastward views from the junction of footpaths CNN23 and CNN24. This impact would be exacerbated by the fact that the land increases in elevation at this northern end of the field, making the housing even more prominent.

These adverse visual impacts should be given great weight, in line with paragraph 172 of the NPPF.

⁴ <https://www.stroud.gov.uk/media/240804/stroud-landscape-sensitivity-assessment-part-2-north-nibley-to-wotton-under-edge.pdf>

⁵ [Local Area Report for areas in England and Wales - Nomis \(nomisweb.co.uk\)](#)

Major Development Tests - Need

Policy CE12 of the Cotswolds AONB Management Plan 2018-2023⁶ states that development in the Cotswolds National Landscape should be based on robust evidence of local need arising from within the National Landscape, with priority being given to the provision of affordable housing.

The site is not identified as a site allocation in either the current Stroud Local Plan⁷ or the draft Local Plan. The Rural Housing Needs Survey for North Nibley is now nearly seven years old. As such, there is very little robust evidence of need arising within the settlement / parish, particularly with regards to affordable housing.

In addition, given that the proposed development is outside settlement development limit, it does not comply with Core Policy CP15 of the Stroud Local Plan, which specifies that such development will not normally be permitted.

If it is identified that Stroud District Council has a shortfall in its housing land supply, the presumption in favour of granting planning permission (i.e. the 'tilted balance') should not apply. This is because the adverse impacts of the proposed development on the Cotswolds National Landscape (and the great weight that should be given to these adverse impacts) provide a clear reason for refusal, in line with paragraph 11di of the NPPF.

Major Development Tests – Alternative Options

Stroud District Council's Landscape Sensitivity Assessment identified two land parcels at North Nibley as having a lower landscape sensitivity to housing than the land parcel where development is being proposed. These are land parcels NN02 (high / medium sensitivity) and NN04 (medium sensitivity).

As such, we consider that, if new housing development was to be considered in North Nibley (for example, if it was identified that there was, in fact, an exceptional need), there are alternative, less sensitive locations that should be considered first.

Major Development Tests – Detrimental Effects

As outlined above, we consider that the proposed development would have significant adverse impacts, particular with regards to the landscape and scenic beauty of the Cotswolds National Landscape. We consider that the potential benefits of the proposed development (including the provision of new housing) are outweighed by these adverse impacts.

Major Development Tests – Summary

Based on the points outlined above, we do not consider that the proposed development passes the major development 'tests' specified in paragraph 172 of the NPPF or complies with Delivery Policy ES7 of the Stroud Local Plan.

Policy Implications

Based on the points outlined above, we consider that the proposed development would not be compatible with national or local planning policy and guidance, including:

- the NPPF (particularly paragraph 172);
- the adopted Stroud Local Plan (particularly Core Policy CP15 and Delivery Policy ES7);

⁶ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

⁷ https://www.stroud.gov.uk/media/1455/stroud-district-local-plan_november-2015_low-res_for-web.pdf

- the Cotswolds AONB Management Plan 2018-23 (particularly policies CE1, CE10, CE11 and CE12);
- the Cotswolds AONB Landscape Strategy and Guidelines (particularly in relation to LCT 3 and LCT8).

If you have any queries regarding these comments please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills
Planning & Landscape Lead
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NOTES:

1). Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.

APPENDIX 1. EXTRACT FROM STROUD DISTRICT COUNCIL'S LANDSCAPE SENSITIVITY ASSESSMENT RELATING TO THE LAND PARCEL THAT INCLUDES THE PROPOSED DEVELOPMENT SITE.⁸

Land Parcel NN07

The sensitivity of this area lies in its relationship to the historic core of the village, with the church, Nibley House and farmhouse, the mature parkland trees, the distinctive grassed mound, the cemetery, and the area's elevation and location as a the local skyline in some views including near the scarp edge to the west and south west. Its value lies in its location in the AONB, the listed buildings including Nibley Farm within the area and Nibley House and the church adjacent, and the PROWs through the area. There are some detractors such as the semi-derelict walled garden and farm activities. Housing development would adversely affect the historic character and settings of the listed buildings, conflict with the essentially linear traditional character this side of the village, potentially impinging on the skyline to the south west, and adversely affecting views from the cemetery and PROWs.

⁸ <https://www.stroud.gov.uk/media/240804/stroud-landscape-sensitivity-assessment-part-2-north-nibley-to-wotton-under-edge.pdf>