

Our ref: AP/P/L-040A
Your ref: 24/02854/OUT

Martin Perks
Cotswold District Council



01285 643644
info@plan-a-planning.co.uk
www.plan-a-planning.co.uk

For the attention of Martin Perks

25th November 2024

Dear Martin,

LAND WEST OF KINGSHILL LANE CIRENCESTER GLOUCESTERSHIRE GL7 1HS – APPLICATION NO.
24/02854/OUT – OBJECTION TO OUTLINE PLANNING APPLICATION ON BEHALF OF PRESTON
PARISH COUNCIL

Plan-A Planning & Development Ltd have been instructed by our client, Preston Parish Council, to make representations in respect of the application – reference 24/02854/OUT - submitted in conjunction with the above site for:

Residential development for up to 280 dwellings, associated works including infrastructure, ancillary facilities, open space, landscaping and pumping station. Construction of a new vehicular access off Kingshill Lane (Outline application)

The application was received on the 24th September 2024 and validated on the 21st October 2024 with a consultation expiry date of the 28th November 2024. The application site has a detailed planning history. This application is the resubmission of an outline planning application which was refused on 27th September 2023 (23/01597/OUT) by Cotswold District Council with seven reasons for refusal. An appeal to this application was lodged but withdrawn on 23rd May 2024, to which we submitted a separate objection on behalf of Preston Parish Council.

The application site itself relates to a group of agricultural fields in open countryside adjacent to the eastern edge of the settlement of Cirencester. The site measures approximately 13.49 hectares in size and primarily consists of arable fields bordered by hedgerows and trees. The site occupies a sloping area of land which rises approximately 14-15m from its south to its north.

The site is an unallocated site and for housing purposes would be a 'windfall' site. The site should be seen in context within the agricultural landscape lying between Cirencester and the village of Preston and as contributing positively to the rural setting of both settlements.

Public Consultation

We are surprised that the applicant has not sought to undertake further public consultation given:

- a) The level of public interest in the previous application and subsequent appeal; and,
- b) The new rationale that the applicant is relying upon in relation to the Council's adopted housing numbers.

We respectfully request that the current application is withdrawn to allow for a full public consultation and for the applicant to outline the details of the application.

Principle of Development

The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.

The starting point for an assessment of the application site is the current development plan for the District which, in this instance, consists of the Cotswold District Local Plan 2011-2031 and the Preston Neighbourhood Plan 2020-2031 (adopted May 2021).

The application site is an unallocated site located outside of the Cirencester Development Boundary and outside of a Non-Principal Settlement. The site sits within the Parish of Preston. The adopted Preston Neighbourhood Plan identifies that the parish lies at a critically important location. Its immediate proximity to Cirencester forms a major constituent of one of the 'green wedge' approaches. The adopted local plan recognises that the 'green wedges' are particular characteristics of Cirencester when approaching the town from various directions.

Like the previous application and subsequent withdrawn appeal, the current application is also considered to be premature and prejudicial to the Local Plan Review process. The Local Plan Review process it as an early stage and as such consideration of the application scheme is not considered to be consistent with the Local Plan Review process.

Furthermore, as will become clear, the Council are able to demonstrate more than a 5-year housing land supply and as such the Council's housing needs can be met from sites within Development Boundaries or Non-Principal Settlement's.

Residential Development in this location

The erection of new build open market housing on the application site is subject to several Development Plan policies.

Local Plan Policy DS4 states that new-build open market housing will not be permitted outside Principal and Non-Principal Settlements unless it is in accordance with other policies that expressly deal with residential development in such locations. In respect of Local Plan Policy DS4, the supporting text to the policy states at 6.4.4 that the policy is intended to preclude, in principle, the development of speculative newbuild open market housing which, for strategic reasons, is not needed in the countryside. At paragraph 6.4.5, any land that falls outside Development Boundaries and Non-Principal Settlements is referred to as countryside, even if it is technically previously developed land.

The application scheme will result in the erection of speculative, open market dwellings, in the countryside contrary to Policy DS4 of the Local Plan. In contrast, the Local Plan development strategy for the District seeks to direct new build residential development to sites within Development Boundaries (Policy DS2), or in the case of small scale residential development, within Non-Principal Settlements such as villages and hamlets (Policy DS3).

The Council's housing needs for the Local Plan period – to 2031 - can be addressed through the provision of housing within such locations. The Council can demonstrate a robust supply of deliverable housing land at the present time (7.2 years) and as such there is no overriding need to release further land for new build open market housing outside such areas. It is not therefore sustainable to release further land for such development when the Council's housing needs can be met within Development Boundaries or Non-Principal Settlements. The application scheme is not considered to meet the requirements of either Local Plan Policy DS2: Development within Development Boundaries nor Policy DS3: Small Scale Residential Development in Non-Principal Settlements. There is therefore a strong policy presumption against the erection of new build open market dwellings on the site.

The current proposal is in conflict with the Council's development strategy with regard to the location of new open market housing. The District is on course to deliver approximately 9,671 dwellings over the plan period through the existing development strategy without a need to grant planning permissions for further dwellings in locations that are contrary to the strategy. The figure of 9,671 dwellings is in excess of the objectively assessed need for 8,400 dwellings agreed by the Local Plan Inspector. The strategy is therefore delivering a level of housing in excess of the needs set out in the Local Plan. It is noted that the Government wishes to boost significantly the supply of homes. However, it is also of note that paragraph 60 of the NPPF states that 'it is important that a sufficient amount and variety of land can come forward where it is needed'. The Council's Development Strategy seeks to both boost significantly the supply of homes in the Local Plan period and to direct new homes to locations where they are needed in accordance with the aspirations of Paragraph 60.

The weight that can be given to the erection of new housing in this location, when the Council's land supply position is significantly in credit, is considered to be very limited. The current development boundary was drawn in order to ensure that future development would be proportionate to the level of services on offer in the settlement during the Local Plan period. The development boundary ensures that development in the Local Plan period will be at a level appropriate for the services and facilities on offer. The release of land for residential development in an ad hoc manner around Cirencester

would potentially threaten the balance of the settlement and the long term strategy for the town which has been deemed to be acceptable through the Local Plan examination process; which is at an early stage.

Furthermore, provision has been made for the delivery of 2,350 dwellings on land to the south of Cirencester (16/00054/OUT). The Local Plan has therefore made provision for a significant level of new housing adjacent to the settlement in order to meet the needs of both the town and the District as a whole. Furthermore, the application site along with a parcel of land to its south-west have been assessed as part of the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) process. The document titled 'Strategic Housing and Economic Land Availability Assessment (2021)' gives the application site reference C80 and the land to its south-west reference C185. The summary section of the aforementioned report states the following in relation to the two sites: 'The development of either site would be a significant eastwards extension of Cirencester and would lose agricultural land.'

Both sites have 'High / medium' landscape sensitivity, primarily because of their open nature and their prominent position, which is highly visible to users of the A419 to the south. The development would also cause a level of harm to the historic environment. However, there are also opportunities for enhancements that the development could bring. Recommendation C80 is a candidate for further consideration for allocation for residential development in the Local Plan. C185 is unsuitable for residential development but may be considered as part of the development of the adjacent land in order to deliver some of the planning benefits associated with the wider scheme.'

It is evident that the application site is one that could be considered for allocation as part of the Local Plan review or in future versions of the Local Plan. However, such consideration will have regard to the strategic implications arising from the level of development proposed, future housing needs and the availability of alternative sites. It is appropriate that developments of this size are assessed in a strategic manner as part of the Local Plan process rather than as ad hoc standalone development proposals. The SHELAA assessment does not therefore indicate that the site is one that should be released without further consideration and examination as part of the Local Plan process; it is understood that this is still at a very early stage. It is considered therefore that the application scheme conflicts with the Council's development strategy insofar as the location of new build open market housing is concerned.

It is noted that the applicant is relying upon engaging the tilted balance as set out in paragraph 11d of the NPPF to justify the development proposal in the absence of a five-year housing land supply. The applicant is seeking to argue that because of the proposed changes to the NPPF and in particular the Standard Method, the Council's annual housing land supply position should be 3.81 years.

It is considered that the Council's current housing land supply figure of 7.2 years is reliable, and that it demonstrates that there is no overriding need to release further land for new build open market housing. If the applicant's figure of 3.81 years were applied and the tilted balance engaged, it is considered that planning permission should not be granted as the public benefits of the scheme do not outweigh the adverse impacts.

Green Buffer/Coalescence/Landscape Sensitivity

Appendix 1 below incorporates relevant planning policies from the Development Plan as well as excerpts from the SHELAA Review (Strategic Housing and Economic Land Availability Assessment Update, October 2021). The Preston Parish Design Statement (PPDS) (adopted 26th April 2017) is also considered to this objection, partially because approximately 50% of the village of Preston responded to the questionnaire distributed in October 2015 that sought to direct the direction of the design statement.

Page 4 of the PPDS considers that despite its proximity to Cirencester, the fact that most of the land is arable farmland and subject to rotational cropping helps to maintain the distinctly rural feel of the parish. Within the village of Preston, the farmland “gap” in the middle also helps add to that rurality.

Furthermore, Page 9 of the PPDS relates that the village is surrounded by farm land and there are still some large green spaces along the village’s single street which contribute to giving the village its rural and tranquil feel.

Page 13 of the PPDS provides an important summary. It states that in response to the questionnaire, that had a response rate of approximately 50%, the respondents valued the existing rural atmosphere in the Village and Parish and particularly valued the “greenbelt” between the Western extremity of the village of Preston and the Eastern extremity of Cirencester which, therefore, needs to be preserved in order to ensure retention of the rural “atmosphere” and individual identities. A photo referencing the rural buffer between Preston Village and Cirencester is provided at the bottom of Page 13.

It is recognised that this document is informal planning guidance and not formally part of the Development Plan. However, what it shows is the high value that is placed by residents on the existing rural buffer between Preston Village and Cirencester. A response rate of approximately 50% is high for a questionnaire of this type, and this goes to show the relevance of strategic planning policies such as Local Plan Policy DS4.

In the SHELAA Review of the application site, C80, is considered to have a High/Medium landscape sensitivity. The original outline application was accompanied by a Landscape and Visual Impact Assessment (March 2023). The LVIA overall identifies that the significance of visual effects would be moderate adverse at year 1 and moderate/slight adverse once planting of new green infrastructure has been established. In contrast, in relation to the previously refused application (these comments

are considered extremely relevant to the determination of the current application), the Council's Landscape Officer stated that the site provides visual separation between the built edge of Cirencester and Preston and this is apparent from the footpaths to the east and the A419. Furthermore, the officer stated that the LVIA is reliant on a robust landscape mitigation scheme and that he has concerns regarding the housing density proposed and the strength of the green infrastructure provided across the site.

It is interesting and relevant to note that in relation to the current planning application, the Council's conservation officer has recommended refusal of the application. In relation to Kingshill Lane, it is considered that the proposed development, by bringing the suburban sprawl all the way east to Kingshill Lane, would radically erode and suburbanise the still predominantly rural character of the lane. In relation specifically to the Preston Conservation Area, it is noted that the significance of the Preston Conservation Area rests in part in the character and history of Preston as a small, rural, distinct settlement. As such, both its rural, agricultural setting, and its separation from nearby Cirencester, are aspects of the conservation area's character and setting that contribute positively to this significance. The officer concludes by stating that the proposed development, both by the further encroachment of suburban development towards the rural settlement, and the halving in width of the green buffer/corridor that separates the two settlements, would harmfully erode aspects of Preston's distinct character and setting that contribute positively towards its significance. The level of harm would be less-than substantial but would be moderate.

Based upon an assessment of the relevant Development Plan policies, the comments made by the Council's Conservation Officer on the current application, and the position adopted by the Council's Landscape Officer on the previous application, we consider that the application site constitutes an important area of green space that contributes positively to the rural setting of Cirencester and to the rural character and appearance of the parish of Preston. The site acts as a green wedge between the two settlements and plays an important strategic role.

The introduction of development of the size now proposed onto the site would eat away at this wedge and result in a coalescence of the two settlements. It would result in a significant extension of the eastern edge of Cirencester. The parish of Preston is composed mainly of countryside with scattered dwellings and small businesses. The A417 effectively severs the north and south of the parish from each other. Due to the sloping nature of the site, the proposed development would be readily visible from a number of public vantage points in the area. Views of the development will not therefore be

limited to local views. Due to the scale of the proposals, the application scheme would take the form of a large urban extension into the open countryside, severing the green wedge between the settlements. Set against the skyline it would appear prominent and legible as a large urban extension.

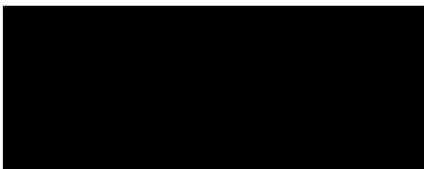
Conclusion

As has been identified, it is our view that the application proposals will result in the erection of new-build open market housing on an unallocated, windfall site, outside a Principal or Non-Principal Settlement contrary to Policy DS4 of the Local Plan.

Furthermore, due to the scale of the proposals, it is considered that the development would take the form of a large urban extension into the open countryside, severing the existing green wedge between the settlements. Set against the skyline it would appear prominent and legible as a large urban extension. In addition, the application proposals are considered to have an adverse impact on heritage assets.

We respectfully request therefore that the application is refused on the basis of the overriding evidence that the proposals are contrary to the relevant planning policies and material considerations.

Yours sincerely,



John Vale BSc (Hons) MSc
Associate Director

Email: jv@plan-a-planning.co.uk

Appendix 1

Relevant Planning Policy

PLANNING POLICY FRAMEWORK

Section 38(6) of the Planning and Compulsory Purchase Act 2004 confirms that where determination is to be made under the Planning Acts, the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan comprises the Cotswold District Local Plan 2011-2031 and the Preston Neighbourhood Development Plan, although the NPPF also represents a material consideration.

Cotswold District Local Plan to 2031

Policy DS4 – Open Market Housing Outside Principal and Non-Principal Settlements

- 1.2 This policy states that new-build open market housing will not be permitted outside Principal and Non-Principal Settlements unless in accordance with other policies which allow for such development.

Policy H1 – Housing Mix and Tenure to Meet Local Needs

- 1.3 Under the terms of this policy, all housing developments will be expected to provide a suitable mix and range of housing in terms of size, type and tenure to reflect local housing need and demand in both the market and affordable housing sectors (subject to viability). Furthermore, proposals of more than 20 dwellings will also normally be expected to provide 5% of dwelling plots as serviced self or custom build plots.

Policy H2 – Affordable Housing

- 1.4 This policy identifies that all housing developments that provide 11 or more dwellings (or which have a combined floorspace of over 1,000sqm), will be expected to contribute towards affordable housing provision. Subject to viability, brownfield sites should make a contribution of up to 30% of new dwellings. However, a financial contribution in lieu of on-site provision may be considered acceptable where the need for affordable housing can be better satisfied through this route. The type, size, mix and tenure split are to be agreed with the Council and should be distributed across the development. Where viability is questioned, or a commuted sum considered, an open book assessment will be required and will be subject to an external assessment paid for by the developer.

Policy EN1 – Built, Natural and Historic Environment

- 1.5 This policy seeks to ensure that new development will, where appropriate, promote the protection, conservation and enhancement of the historic and natural environment. The policy's criteria include a requirement to ensure that design standards compliment the character of the area and the sustainable use of the development.

Policy EN2 – The Built Environment

- 1.6 This policy is supportive of development which accord with the updated Cotswold Design Code. The policy requires that proposals should be of a design quality that respects the character and distinctive appearance of the locality.
- 1.7 The revised Cotswold Design Code emphasises the importance of designing development that either follows an authentic vernacular and traditional approach in line with local architectural character, or that it is designed in a high quality contemporary and innovative manner which reflects and respects local character. The plan recognises that the decision as to whether to adopt a traditional or contemporary approach will depend on the type of development proposed, the site and its setting.

Policy EN4 – The Wider Natural and Historic Landscape

- 1.8 Policy EN4 of the Local Plan states that development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) of Cotswold District or neighbouring areas. This policy requires that proposals will take account of landscape and historic landscape character, visual quality and local distinctiveness. They will be expected to enhance, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, settlement patterns and heritage assets.

Policy EN7 – Trees, Hedgerows and Woodlands

- 1.9 This policy stipulates that, where trees, woodland or hedgerows are to be removed as part of development, compensatory planting will be required and should have regard for the potential for new or extended woodland to assist in carbon storage.

Policy EN8 – Biodiversity and Geodiversity: Features Habits and Species

- 1.10 This policy confirms that development will be permitted which conserves and enhances biodiversity and, where possible, provides net gains. Proposals that promote the creation,

restoration and beneficial management of ecological networks, habitats and features will also be permitted, particularly in areas subject to landscape-scale biodiversity initiatives.

Local Plan Policy EN10 Designated Heritage Assets

1.11 States that:

1 In considering proposals that affect a designated heritage asset or its setting, great weight will be given to the asset's conservation. The more important the asset, the greater the weight should be.

2 Development proposals that sustain and enhance the character, appearance and significance of designated heritage assets (and their settings), and that put them to viable uses, consistent with their conservation, will be permitted.

3 Proposals that would lead to harm to the significance of a designated heritage asset or its setting will not be permitted, unless a clear and convincing justification of public benefit can be demonstrated to outweigh that harm. Any such assessment will take account, in the balance of material considerations: - The importance of the asset; - The scale of harm; and - The nature and level of the public benefit of the proposal.

Local Plan Policy EN11 Designated Heritage Assets - Conservation Areas

1.12 States that:

Development proposals, including demolition, that would affect Conservation Areas and their settings, will be permitted provided they:

- a. Preserve and where appropriate enhance the special character and appearance of the Conservation Area in terms of siting, scale, form, proportion, design, materials and the retention of positive features;
- b. Include hard and soft landscape proposals, where appropriate, that respect the character and appearance of the Conservation Area;
- c. Will not result in the loss of open spaces, including garden areas and village greens, which make a valuable contribution to the character and/or appearance, and/or allow important views into or out of the Conservation Area.

d. Have regard to the relevant Conservation Area appraisal (where available); and e. do not include internally illuminated advertisement signage unless the signage does not have an adverse impact on the Conservation Area or its setting.'

Policy INF2 – Social and Community Infrastructure

- 1.13 This policy sets out the necessary provisions which should accompany community facilities (including open space) required as a consequence of development proposals. In particular, provision of community facilities should be synchronised with the delivery of the development; accessible to the local community on foot, bicycle or by public transport; and provision made for the ongoing management/maintenance of the facility.

Policy INF4 – Highway Safety

- 1.14 This policy outlines that development will be permitted so long as it provides safe and suitable access that is well integrated with the existing transport network.

Policy INF5 – Parking Provision

- 1.15 This policy seeks to ensure that developments for new residential properties comply with the corresponding parking standards and associated guidance.

Policy INF7 – Green Infrastructure

- 1.16 This policy confirms that, where appropriate, development proposals should contribute to the delivery of new Green Infrastructure and link to the wider Green Infrastructure network.

Preston Neighbourhood Development Plan 2020-2031

Policy 1: Preston Countryside and Landscape 'Other than within the AONB, new development should where appropriate promote the following:

- i. Replanting non-native tree plantations with native broadleaved native species as part of the woodland succession planting;
- ii. Avoiding unsympathetic new woodland planting including new dense linear shelterbelts, particularly in character areas 4a, 4b and 5, which would enclose the character of the landscape at points where it is currently open;

- iii. Managing existing shelterbelts with selective thinning to retain native specimens and open up views below their canopies; maintaining dry-stone wall boundaries and restore any in disrepair;
- iv. Restoring historic hedgerow lines;
- iv. Maintaining the existing network of open ditches and streams to ensure continuity of irrigation to fields and surface water management to grass and agricultural fields;
- v. Protecting open views between buildings of Preston's agricultural setting when viewed from the village main street (Witpit Lane);
- vi. Establishing a pedestrian link using the route of the old railway line to create a public footpath which connects the whole of the parish on a north/south axis;
- viii. Resolving footpath links across the dual carriageway to improve connectivity across the parish. '

Policy 2: Design 'Proposals for new development, including extensions to existing buildings, and conversions of farm buildings, should be of the highest design standards in accordance with the relevant policies of the Cotswold District Local Plan, including the Cotswold Design Code.

Proposals should have specific regard to the following conclusions derived from the Design in Preston Design Statement (2017):

- i) Publicly accessible green spaces (such as the formal spaces around community infrastructure and incidental spaces such as grass verges) within the village built-up area should be retained if possible.
- ii) Proposals should use locally characteristic building materials, for example Cotswold stone and reconstituted Cotswold stone for walling, roofing and timber for windows and doors, where appropriate.
- iii) Properties should have high quality boundary features, such as hedges and Cotswold Stone walls where appropriate, particularly where these are visible from public vantage points

In addition to the SHELAA assessment, the application site has also been assessed as part of Preston Neighbourhood Plan, which states:

'Sensitive receptors are the users of the Country park, the village residents, users of Kingshill Lane and of the public footpath which runs east to west along the north of this area, and users of the A419 Ermin Way. Views of the Kingshill Meadow estate are prominent on the approach to Cirencester, although the presence of the recently established parkland along the road will create screening to this development in the longer term. For any proposed development to be considered appropriate in this sub-area, it would need to retain the open agricultural character of the landscape, ensure the identity of the village of Preston to be retained as a separate settlement and with its own countryside setting, maintain the visual amenity of PROWs, and ensure that the green wedge approach to Cirencester is retained. It would be appropriate if the existing country park along the Ermin Way is extended to the east.'

Paragraph 44 of the Neighbourhood Plan states: '44. Since its first settlement, Preston village has maintained a separate identity from other villages in the area, particularly Cirencester. Villagers have demonstrated their passion for retaining Preston's separate identity throughout the NDP consultation. The importance to them of retaining this - geographically in terms of built development, and socially in terms of preserving a village where people know and like one another - was stressed time and time again during public consultation. What residents fear the most is the coalescence of Preston with Cirencester and a merging of the two areas'.

Paragraphs 59 and 60 go on state: '59. The character of Cirencester is strongly informed by areas of open landscape which, through varying degrees of parkland and agricultural character, reach close to the town centre from several directions, principally from the west (Bathurst estate), the north-east (Abbey Home Farm estate) and the south-east (Preston parish & Kingshill Country Park) 9 . The largely unspoilt agricultural section of the parish serves this important 'green wedge' purpose, which is described by the Local Plan as follows: 'The 'green wedges' and views of [Cirencester] Parish Church tower, are particular characteristics of Cirencester when approaching the town from various directions.' (para 7.2.3)

60. In this context, Preston Parish lies at a critically important location. Its immediate proximity to Cirencester forms a major constituent of one of the 'green wedge' approaches (particularly Area 4b). It also emphasises by contrast to the open views of the urban town itself, the importance of the parish as an open landscape setting to the largest of the Cotswold towns'.

2021 SHELAA Review

Since the adoption of the Cotswold Local Plan, the appeal site has been assessed as part of the recent SHELAA Review (Strategic Housing and Economic Land Availability Assessment Update, October 2021) and was given the reference C80.

The assessment notes that:

- i) The parcel was assessed as part of the 'Study of land surrounding Key Settlements in Cotswold District Update, Additional Sites: Final Report' (Cotswold District Council and White Consultants, October 2014) report. The description provided for this parcel is reproduced below and remains an appropriate description;
- ii) The site comprises of three arable fields with moderately regular boundaries on the sloping valley sides of the River Churn. The field boundaries are low cut hedges running along the slopes but a mixture of low hedge and fence along Kingshill Lane to the east. The site is therefore open. The western boundary is open abutting a line of pylons and power lines which are a detractor. Beyond this to the west is the recently constructed Kingshill development which has been built reflecting vernacular forms and has a moderately varied

structure and a positive edge, though unmitigated with vegetation at present. There is a public footpath running along the slope through the site. To the east there is a young mixed tree belt. To the south, the site abuts the relatively open floodplain and views are possible across this from the busy A419(T) which also reduces tranquillity through movement and noise. A sports building and low floodlights are visible on the skyline to the north of the site. Listed buildings lie at Preston Forty Farm to the south and Preston Conservation Area lies to the east beyond the tree belt'

- iii) C80 evaluation: High/Medium The landscape sensitivity given to the parcel as part of its inclusion within the 'Study of land surrounding Key Settlements in Cotswold District Update, Additional Sites: Final Report' (Cotswold District Council and White Consultants, October 2014) report was High/Medium. The justification provided for this rating is reproduced below and remains an appropriate justification for the parcel's landscape sensitivity:
- iv) The site is susceptible to change because it is open and lies on a prominent slope highly visible to users of the A419 to the south. Development on this site would be a major extension of built form into open countryside. The presence of the sports facilities to the north are not sufficient justification for a major built extension as they are relatively low key in nature. The power lines provide a logical boundary to the built form and the new development will provide a positive edge once landscape planting is established'; and in summary states that
- v) The development of either site would be a significant eastwards extension of Cirencester and would lose agricultural land. Both sites have 'High / medium' landscape sensitivity, primarily because of their open nature and their prominent position, which is highly visible to users of the A419(T) to the south. The development would also cause a level of harm to the historic environment. However, there are also opportunities for enhancements that the development could bring

With regard to the historic environment, the SHELAA states:

Historic Environment (excluding archaeology) These comments are made on the basis of a desktop and site survey conducted by a Principal Planning Policy Officer. A full historic environment or heritage assessment would be required of any development proposal. The 350 dwelling planning application on C80 included a response from the Council's Conservation Officer. The issues identified are relevant to both sites and included:

o Preservation of the character of Kingshill Lane, which is a predominantly rural road. The development will encroach on the boundary of the lane and will potentially suburbanise the character of this part of the lane, which would be an adverse impact.

o Forty Farm is located to the south-east of the site. There are two Grade II Listed buildings associated with the farmstead, the Farmhouse and the threshing barn. Other structures within the site may be considered curtilage listed. The proposal was considered to cause harm to the significance of the listed building and its setting.

o Setting of Preston Village, Conservation Area and associated listed buildings to the east - Preston village is located to the south-east of the site. The historic core of the village contains several buildings that are Grade I and II listed including All Saints Church. The core of the village is also located within a Conservation Area. The response identified that the proposal for 375 houses would not provide capacity to introduce appropriate buffers and tree screening from the southern and eastern boundaries in order to protect the setting of listed buildings including the setting of Forty Farm and also the Preston Conservation Area. Nor did the proposal appear to provide capacity for suitable public amenity space. This would need to be addressed if the site were allocated in the Local Plan.

The development of either site would be a significant eastwards extension of Cirencester and would lose agricultural land. Both sites have 'High / medium' landscape sensitivity, primarily because of their open nature and their prominent position, which is highly visible to users of the A419(T) to the south. The development would also cause a level of harm to the historic environment. However, there are also opportunities for enhancements that the development could bring.' The open agricultural character of the existing site contributes to the rural setting of the listed buildings to its south and the village of Preston to its east. The SHELAA identifies that the proposed eastwards extension of Cirencester would result in harm to the historic environment.

