



Appeal Decision

Site visit made on 23 October 2025

by **Mr D Szymanski BSc (Hons) MA MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 17 November 2025

Appeal Ref: APP/C1625/W/25/3367055

Land at Southfield, Longney, Gloucestershire GL2 3SH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mrs Elizabeth A. K. H. Escott-Price against the decision of Stroud District Council.
 - The application Ref is S.24/1975/FUL.
 - The development proposed is described as Erection of 1x Dwelling, Access and Associated Works.
-

Decision

1. The appeal is dismissed.

Preliminary Matter

2. The decision notice and appeal form refer to an amended description to add reference to the proposal as being for a self-build dwelling, which I have had regard to in determining the appeal.

Main Issues

3. The main issues are:
 - the effect of the proposed development upon the setting and significance of Manor Farmhouse as a designated heritage asset;
 - the effect of the proposed development upon the character and appearance of the area; and,
 - whether or not the proposed development would be acceptable having regard to policies for flood risk, with particular reference to evacuation and surface water drainage.

Reasons

Designated heritage assets

4. The appeal site is in proximity to the Grade II Listed Manor Farmhouse. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the LBCAA) requires special regard is had to the desirability of preserving the setting of a listed building or any features of special architectural or historic interest it possesses. Paragraph 202 of the National Planning Policy Framework (2024) (the Framework) highlights designated heritage assets are an irreplaceable resource. Paragraph 212 requires when considering the impact upon the significance of a designated heritage asset, great weight should be given to the asset's conservation. Harm to

- significance, including from development within its setting, requires clear and convincing justification (paragraph 213).
5. Manor Farmhouse is a large brickwork detached farmhouse, early C18th, with C19th and C20th alterations. The listing description references various attributes of its construction and architectural features that I was able to observe at my visit. It is a sizeable imposing building with two large ridge-mounted chimneys on a plain tile roof with parapets. It includes a 6-window first floor, roof accommodation with hipped attic dormers, and two blocked ground floor windows. To the rear it includes a single range with staircase wing that is 2-storey with attic.
 6. The listing description describes it as an unusually large and early brick-built house in the area, probably standing on the site of a medieval manor house, that dominates the north vista up the road south from the village. This was clear to see, although, a listing description is not a full or comprehensive record of an asset's special interest, significance or the contribution of the setting towards this.
 7. It's special architectural and historic interest and significance derives principally from its age, historic physical fabric, form, scale, prominence and legibility as a large and probably quite high-status building associated with a significant farming operation, and its evolution through time. Its setting includes agricultural buildings, land, parts of nearby historic thoroughfares and adjacent green spaces, vegetation, gardens and residences including around the nearby highway junction. The setting contributes to the significance of Manor Farmhouse as it retains its eminence as a large prominent historic building in relation to and a limited distance from village dwellings, and it being visible within its agrarian surroundings and the verdant rural landscape, within which it was and is viewed, experienced, and associated with.
 8. A small copse and hedgerows provide some screening, and Southfield and Forest view are visible within the backdrop. However, there is clear intervisibility with the appeal site, particularly around the highway junction and from the west. The current set back of dwellings to the south provides space and separation that contributes to the sentinel standalone quality that has a rural, rather than suburban character to this part of the setting, with some visual reflection of countryside to the north, east and west. As a part elevated relatively open, undeveloped and vegetated space around the junction and close to Manor Farmhouse, the appeal site makes a positive contribution to the setting, significance, and the way in which Manor Farmhouse experienced, notable from the west and within the appeal site.
 9. Though the dwelling might not be as high as Manor Farmhouse or Southfield, much of the appeal site would be retained as garden, and the dwelling would be set towards the east, the proposed dwelling would still be of some significant scale. Its scale, orientation and position, and the hardstanding would reduce green space and visibility of vegetation to its rear and introduce a significantly sized new quite modern appearing building, which would infringe upon, suburbanise, enclose and erode space within the setting of Manor Farmhouse. Though it might not be regarded as challenging its dominance, and I note the carefully considered design and materials, it would still appear as quite a significant building in proximity to it, in an area to its south where the current space contributes to its sentinel and standalone quality.
 10. There is little detail of the scale and design of previous buildings in the C19th, so their past existence does not persuade me there would not be some adverse

effects from the appeal scheme. Therefore, though the harm would be less than substantial harm, the proposed development would adversely affect the setting and significance of Manor Farmhouse and the way in which it is experienced. This would be visible from within much of the appeal site, around the highway junction and to the west. I am not convinced that suitably worded planning conditions such in respect of matters such as materials and landscaping could adequately mitigate the harm. Therefore, I cannot agree this scheme meets the objectives of Framework paragraph 219 in terms of preserving or enhancing the setting.

11. For the reasons set out above, the proposed development would have an adverse effect upon, and so neither preserve or enhance, the setting and significance of Manor Farmhouse. This would conflict with the aims of section 66 of the LBCAA, the relevant provisions of which I have set out above. It would also conflict with the aims of Policy ES10 of the Stroud District Local Plan (2015) (the SDLP) insofar as it seeks proposals protect and where appropriate enhance the significance of heritage assets. I have considered the appeal scheme in relation to the Framework and criterion 5) of Policy ES10 in the heritage balance section.

Character and appearance

12. The character and appearance of the area can be characterised by Longney as a settlement viewed in two parts, mostly north to south, and has a relatively linear but scattered development pattern, with varying age and forms of primarily residential development. The character and appearance varies around the junction of Chatter Street, Epney Road and Hardwicke Road, with a quite a spacious character on the settlement edge, and also with the collection of rural buildings of Manor Farm.
13. Though it may well have formed part of the functional village core Manor Farm is outside the settlement and as a cluster of agricultural buildings in the rural landscape to its east and west, is of a distinctly different character and appearance to Longney, and is viewed and experienced as a gap between the two parts of the settlement. This and appeal site are set within a wider backdrop of what is a relatively open gently undulating agrarian landscape.
14. I note the Longney and Epney Village Design Statement (2011) (the VDS) and the Council's and appellant's views upon parts of its description and content. Though the appeal site might be defined as previously developed land and of a domestic use, much of the appeal site is part of a garden, comprising grassland and a small number of fruit trees enclosed within hedgerows of varying height, species and vigour, though with an inherent potential for paraphernalia.
15. The large plot size, verdant nature and general absence of built development within much of the appeal site reflects its settlement edge position and appearance. It provides a softened transition on the settlement edge, with some attributes reflective of the countryside to the north, east and west. Overall, it is in keeping with and makes a positive contribution to the character and appearance of the area and transition to the countryside.
16. The proposed development would subdivide the plot and increase the density and intensity of development, with a sizeable dwelling viewed as being largely perpendicular or backing onto to, instead of addressing the highway or being at an angle to it, and significantly forward of the existing building line of Southfield and Forest View. From what I could see, this layout and orientation combined with its proximity to the highway does not really appear characteristic of dwellings nearby.

17. In my judgement, the pallet of materials overall, and glass link, would not specifically result in harmful effects. It is compliant with distances for proximity for privacy referenced in the RDG¹, its ridge is a limited amount lower than Southfield, it has a reduced height projection, and I note the efforts to break up the elevations. However, particularly from the west it would still be viewed as a building of significant scale, feel quite abrupt for its settlement edge location and its orientation does not appear to preserve the hierarchy of development in the street scene. It would be viewed as appearing as quite awkward in its relationship to its surrounds and somewhat out of keeping with village development.
18. The appeal scheme may comply with certain specific aspects of policies in respect of principle, design, and development density, I am referred to in the Framework, National Design Guide, and such as in Policies HC1, CP14, ES7 and ES12 of the SDLP. However, these matters do not mitigate or outweigh the harmful effects from the development. I am not satisfied that suitably worded planning conditions in respect of matters such as materials and landscaping could satisfactorily mitigate the harm. The harm would primarily be visible from the west and parts of a small number of neighbouring properties and land.
19. For the reasons set out above the proposed development would be harmful to the character and appearance of the area. It would conflict with Policies HC1 and CP14 of the SDLP. Amongst other things, these require that development protects, conserves and enhances the environment, is of a scale, layout and design compatible with the character and appearance of the part of the settlement in which it would be located, and that proposals on edge of settlement sites should retain a sense of transition between the countryside and existing settlement's core.

Flood risk – evacuation

20. Like some dwellings to the south, the appeal site is within flood zone 1 but surrounded by areas within flood zone 2 and 3. It is effectively within an 'island', so during certain events could be cut off from other safe areas for refuge. A dry means of safe access is not demonstrated, which could provide an additional burden to emergency services during a major flood event. The Council's technical adviser considers such islands should be considered as flood risk areas due to the loss of important services during those flood events and absence of safe routes. However, it is unclear where this is set out in policies or guidance upon such matters, or that the sequential test or a specific flood risk assessment is required.
21. The appellant's Flood Response Plan (FRP) is based upon the occupiers receiving a Flood Warning from the Flood Warnings Direct service, utilising a grab bag and evacuating prior to flood waters rising. In the event this is not possible, they would take refuge until water levels have receded enough to allow safe access. Some of the evacuation route set out would be in flood zones 2 or 3, and potential depths are not clear. However, the FRP indicates given it is within zone 1, it is considered safe to remain in-situ should evacuation initially not be possible until such time that emergency services have confirmed water has receded to levels deemed safe for evacuation. This would seem to be the case for other dwellings to the south.
22. The purpose of future occupiers signing up for a flood warning service is so that they are given advance notice of a flood event and its potential severity. It is possible it might fail or there might be issues with gauge readings. Although the

¹ The Residential Design Guide (2000).

substantive evidence suggests it is a standard and well-accepted approach for an important aspect of flood warnings and evacuations, and I am not provided with documented evidence of the risk of failure or that this has occurred in this location.

23. It may well be that emergency services have to evacuate more occupants, if it is possible, but it would not be the only property within quite a sizeable island. Moreover, the new dwelling would be in a location (zone 1) where the dwelling and its occupants would be highly likely to be safe, and subject to stocking of necessary provisions, and adaptations, might well be relatively comfortable for quite a period of time. This could be included within a revised FRP, secured by a condition.
24. Overall, I find the Council has not sufficiently substantiated its case that the appeal scheme conflicts with specific requirements of guidance or policy, and subject to the imposition of suitably worded conditions, the residual risks could be mitigated and managed to an acceptable level having regard to the accompanying text in 6.26 of Policy ES4.
25. Based upon the specific evidence before me, for the reasons set out above, I find the proposed would be acceptable having regard to policies concerning flood risk with particular reference to evacuation. I find therefore, it would not conflict with the aims of Policy ES4 of the SDLP insofar as it states development should be safe.

Flood risk - drainage

26. Framework paragraph 181 states that it should be ensured that flood risk is not increased elsewhere, and a similar reference is made in the supporting text to Policy ES4 of the SDLP. Both Framework paragraph 182 and Policy ES4 give priority to sustainable drainage, with the latter setting out prioritisation of methods and information sought to inform measures proposed. Notwithstanding the soil types, it is not put to me, and the substantive evidence is not clear this meets the definition of being in an area with known ground and surface water flooding issues.
27. The appellant has provided a drainage layout with a subsurface tank it is confident provides sufficient capacity. The Infiltration Testing Report explains that one deep pit to 1.8m indicated sand and gravel to 1.6m before terminating at clay bedrock, which remained stable and dry, indicating no groundwater over the time it was open. The report states that in accordance with BRE365 three test runs were completed in Pit 3, however, it was only possible to complete two tests in Pit 2 and one in Pit 1 owing to slower drainage, so a degree of extrapolation was made.
28. The Council considers the results confirm that infiltration test results do not conform to BRE Digest 365. Trial pits 1 and 2 could not complete the test 3 times designed to mimic repeated rainfall events to ensure that the ground has capacity to retain and infiltrate water when saturated. It also highlights pit 3 has extrapolated data points, suggesting the results were not measured results. Therefore, a viable means of managing the surface water runoff is not provided.
29. The appellant informs me it is common that either three tests are not carried out, or data is extrapolated due to time constraints, although I am not totally convinced it would be appropriate to approve the scheme based upon the data in this instance, and no alternative receptor is identified. However, based upon the appellant's substantive evidence, and the scope within the appeal site for potential solutions, I see no reason it would not be possible for further testing and a suitable scheme to be achieved within the scope of appeal scheme, to comply with the development

plan, Framework and relevant guidance. Given its importance, it should be the subject of a suitably worded Grampian condition, so if a suitably policy compliant scheme is not provided, then the development would be unable to commence.

30. Therefore, for the reasons set out above, subject to the imposition of suitably worded planning conditions the proposed development would be acceptable having regard to policies concerning flood risk with particular reference to surface water drainage. It could be ensured the development would not conflict with Policy ES4 of the SDLP which states that development shall incorporate SuDS in accordance with national standards, and should discharge surface run-off, in accordance with the destination hierarchy.

Other Matters

31. The site lies within catchment zones of the Severn Estuary Special Area of Conservation (SESAC) and the Cotswolds Beechwoods Special Area of Conservation (CBSAC). The appellant's planning obligations seek to secure payments towards mitigation in accordance with approved strategies, which the Council appears satisfied with. As they seek to secure mitigation against the likely significant effects of the proposal and would not result in overall benefits, as I am dismissing the appeal for other substantive reasons, I have not considered this matter further. On the basis the obligations would adequately secure the delivery of full and timely mitigation, this would be a neutral matter in the balance.
32. An interested party raises points in respect of ownership of a leasehold covering a small part of the appeal site. However, as I am dismissing this appeal for other substantive reasons, I have not considered this matter in detail, including whether or not it might have implications for the above planning obligations.
33. Reference is made to two further Grade II listed buildings either side of Epney Road called Box Tree and Vallender, and the Grade I Listed Church of St. Lawrence north of the site. I could not gain any intervisibility between those designated heritage assets and the appeal development. On this basis, the appeal development would have no adverse effect upon their settings.

Heritage and Planning Balance

34. The proposal would result in a limited level of less than substantial harm to the setting and significance of Manor Farmhouse. Framework paragraph 215 states where a development would lead to less than substantial harm to the significance of a designated heritage asset, this should be weighed against the public benefits. However, great weight should be given to an asset's conservation, and less than substantial harm should not be equated to a less than substantial planning objection.
35. The proposal would result in limited temporary economic benefits during construction and once complete some on-going benefits to the local economy, including through spend and supporting the vitality of local services and facilities. The evidence indicates the Council can only demonstrate a housing land supply (HLS) of around 3.24 years, so policies most important for determining the application are considered out of date. The evidence indicates it is unlikely the emerging plan will be adopted to remedy this situation for quite some time.

36. The proposal gains support from the Framework in respect of matters including significantly boosting the supply of new houses, the importance and merits of small to medium-sized sites, design to meet high accessibility standards, more efficient use of land and Self-build and Custom-build (SCB) dwellings. Both main parties provide considerably contrasting views of the needs and provision to meet SCB demand in the area, historically and more recently, given the statutory duties².
37. Neither party is clear why the opposing parties' figures differ so much. Were I to take the view the lower figures are correct and need would be acute, a view it is unlikely the situation would be remedied through the plan-led process for some time, and assume the safeguards and condition could secure an SCB dwelling, the provision of a single dwelling would be elevated to attract moderate weight in favour of the appeal scheme.
38. The scheme could secure improved landscaping, and a net biodiversity gain, in accordance with relevant Framework and development plan objectives. Based upon the substantive evidence, these could be moderate overall gains. It is also possible the scheme could secure a limited overall benefit in respect of drainage, and potentially some overall net renewable energy generation, although there is little to suggest these might be anything other than limited overall benefits. In respect of interested party views of beneficial effects for the occupiers of Southfield in respect of matters such as outlook, privacy and noise, there is little substantiation of this, and they might only constitute very minor benefits if at all.
39. Were I to agree the proposed development would be, or subject to the imposition of suitably worded conditions could be, compliant with policies and standards in respect of matters such as the living conditions of neighbouring occupiers not referenced above, the living conditions of future occupiers, the location of new development, accessibility, access, parking standards, ensuring no harm to protected species, these would be neutral matters in the balance. Compliance with flood safety and evacuation expectations is a neutral matter. Mitigation measures to offset the effects of the appeal scheme upon the SESAC and CBSAC would also be neutral matters in the balance. Overall, the policy compliance and benefits of the development attract moderate weight in favour of the scheme.
40. However, when giving considerable importance and weight to the special regard I must have to the desirability of preserving the setting of a listed building, the harm that would arise from the proposal would not be outweighed by its cumulative benefits. Therefore, there would be a conflict with Framework paragraphs 213 and 215 as the harm to a designated heritage asset would not be outweighed by the benefits, and would not have a clear and convincing justification. The proposal would therefore also conflict with Policy ES10 of the SDLP which sets out similar requirements.
41. Notwithstanding the HLS position, having regard to Framework paragraph 11d)i) the application of policies in the Framework that protect areas or assets of particular importance provide strong reasons for refusing the development proposed. Therefore, the tilted balance in paragraph 11d)ii) does not apply.
42. The proposed development would result in harm to setting and significance of a designated heritage asset for which the Framework policies have not been met. This matter attracts great weight against the scheme. It would also be harmful to

² Section 2A of the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016)

the character and appearance of the area, which would be of a magnitude that attracts moderate weight against the scheme. Overall, the harm from the proposed development outweighs the benefits, therefore, the appeal should not succeed.

Conclusion

43. The proposed development conflicts with the development plan read as a whole, the Framework read as a whole, and the aims of section 66 of the LBCAA. There are no material considerations advanced that indicate the decision should be made other than in accordance with the development plan. Therefore, for the reasons given, the appeal should not succeed.

Mr D Szymanski

INSPECTOR