

Summary of Representations

Made on the Reg.18 Consultation January 2015 Report

Development Strategy and Site Allocations

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1. Introduction

1.1 Following the approval of Cabinet in December 2014, the Local Plan Reg.18 Consultation: Development Strategy and Site Allocations document was formally published for a 6-week period of consultation during January and February 2015.

1.2 In response, 9,938 representations were received from 2,101 individuals and organisations including members of the public, town and parish councils, other local authorities, infrastructure providers, agencies, action groups and developers/landowners. About 6,500 of these representations were internet-generated objections to one of the proposed gypsy and traveller sites at Seven Springs, Coberley (the campaign is known as Lecky Hill RAID).

2. Key Issues

Development Strategy

2.1 The Reg.18 document essentially proposed a similar approach to the Preferred Development Strategy (May 2013), with 17 settlements identified to deliver the District housing requirement. The only difference was Down Ampney effectively replacing Siddington in the list of settlements. The notional housing numbers that were previously assigned to each of the settlements were replaced with site-specific allocations (which had been subject to thorough assessment, including community engagement).

2.2 About 50 representations suggested that the Strategy should be more dispersed, instead of focussing on one large strategic site at Chesterton in Cirencester, raising particular concerns about infrastructure availability/provision and traffic. Some raised concerns about over-reliance on a single, large, strategic allocation and/or Cirencester to deliver the majority of the District's housing requirement. Others felt the Chesterton site should be significantly reduced in scale, claiming that it placed a disproportionate/ unfair burden on Cirencester and the south of District. Various representations made cases for more development being located at other sustainable settlements, including: Moreton-in-Marsh, Fairford, Lechlade, Andoversford, Upper Rissington, Kemble, Down Ampney and Northleach. A couple of representations suggested that Ampney Crucis and Kempsford should be included in the Strategy.

- 2.3 There was some support for the proposed strategy and the settlements identified for delivering future housing, including from the Highways Agency. Several representations noted that developers are increasingly attempting to create false perceptions of sustainability, e.g. suggesting minimum acceptable criteria as being justification for development proposals, when locations with significantly greater amenities have already been identified in the Local Plan.
- 2.4 Officers' review of the representations indicates that no compelling evidence has been presented to suggest the proposed strategy is inappropriate or less sustainable than other alternatives.

Kemble Airfield

- 2.5 About 430 comments were received - both for and against - a 2,000-home new settlement proposed by developers at Kemble Airfield, of which 600-700 dwellings and associated employment development was within the Cotswold District administrative boundary. The remainder of the development was proposed over the County boundary in Wiltshire. The new settlement had not been put forward as a strategic option in this - or any earlier - Local Plan consultation document, not least because submission in response to the January 2015 consultation was the first time that the Council had formally received such a proposal. The Kemble Airfield proposal effectively challenges the Council's development strategy by proposing a large-scale development in a completely different location to the one proposed by CDC.
- 2.6 Officers would not usually respond directly to comments made in representations. However, in this case, it was considered apposite to do so given the strategic nature of the proposals and the high volume of comments received in response to it.
- 2.7 The proposed new settlement was supported by around 400 representers - a substantial proportion of whom were also opposed to the proposed strategic development site to the south of Chesterton. Many responders submitted identically-worded forms stating a preference for the use of brownfield, rather than greenfield, land. Others suggested that development at the Airfield could alleviate pressure for housing development elsewhere in the District.
- 2.8 32 'objectors' to the Kemble Airfield proposal raised a number of concerns including: loss of employment uses, over 30 of which (>300 jobs) are reliant on the airfield; extensive on-site contamination; isolated location/ lack of facilities; landscape harm; significant loss to the aviation community; and the Cotswold housing supply would benefit less than suggested because most of the proposed development is in Wiltshire.

District Housing Requirement

- 2.9 The District Housing Requirement is based on the objectively assessed needs (OAN) for the District produced by consultants Neil McDonald and Christine Whitehead in October 2014. The OAN concluded that 7,600 dwellings needed to be delivered over the period 2011-2031.

2.10 Over 160 objections were received to the Objectively Assessed Housing Need (OAN) claiming that it was both too high and too low. The main issues raised were;

- The Council should increase its housing requirement to exceed the OAN in order to take account of adverse market signals. Evidence suggests CDC is subject to ageing population and high levels of out migration. It is one of the least affordable areas in the south west.
- Objections to the high number of houses needed and the government's push to house building.
- Evidence base does not meet full OAN, or paragraph 47 of NPPF. Should increase OAN for delivery of affordable housing.
- Latest evidence does not reflect the requirements of NPPF or PPG. Applies a policy decision not to meet the higher levels of household growth required to meet the higher economic projections. Based on LEP's policy to redistribute economic growth.
- Support the OAN evidence, but there are some errors when drawing conclusions. Risks over provision of houses not required for local need that could lead to an increase in out commuting. 7,600 is absolute maximum.
- The evidence must be unconstrained. Employment scenarios provide the most solid basis for the OAN. Housing provision should be between 11,500 and 12,500.

2.11 Officers recognise that OAN is an on-going issue - the OAN will be updated further, as and when necessary, to take account of updated demographic projections and economic considerations. Further updates will be cognisant of updated guidance and best practice on producing OANs, including outcomes from other local plan examinations.

Strategic site south of Chesterton

2.12 Just over 300 representations were submitted, some of them supporting the identification of this site. The main issues raised were:

1. **Traffic** - The majority of concerns were regarding traffic issues and the impact on the existing road network, potential mitigation measures and junction improvements. Comments highlighted the need for improvements and that these improvements should be in place prior to the development being occupied.
2. **Infrastructure** - Many concerns were expressed regarding the inadequacy of infrastructure, service provision, schools, GP surgeries and the hospital to support an increase in population. Representers felt that infrastructure improvements should be provided simultaneously with the development.
3. **Sewerage** – In addition to infrastructure, many specifically highlighted: flooding; the inadequacy of the sewerage network; adequacy of SUDs; and provision of fresh water.
4. **Impact** – In light of the points above, many people are concerned about the impact of the development on Cirencester, stating that it is too large for the town.
5. **Other** reasons for objecting include:
 - the impact on car parking in Cirencester;
 - the fact that it is a greenfield site and the resulting loss of agricultural land;
 - lack of public transport and whether it will be improved;

- constraints on site, such as pylons, gas pipeline, wildlife and groundwater protection zone;
- the process has not taken account of community objections.

2.13 Support both for the strategy of locating the majority of development south of Chesterton and the level of growth to be accommodated at Cirencester. Responders supported:

- the approach taken and the aim to maintain Cirencester's status and facilities;
- development where it is sustainable and provides access to education, employment and services;
- a once-in-a-generation opportunity to develop a new Ward, but must ensure deliverable design solutions are adopted;
- edge of town growth to reduce environmental impact and enable cost effective integration with existing infrastructure;
- the inclusion of allotments and integration of public transport in new developments and to serve other areas in the town;
- the proposed improvements to Cirencester's facilities as well as other infrastructure in leisure and recreational facilities.

Settlement Strategies

2.14 All of the representations on the individual 17 settlements have been analysed. Most representations commented on the new housing sites proposed for settlements. Some of the settlements and sites which drew the most comments were;

- Blockley - Little Shoe Broad BK5
- Chipping Campden - 23b and c Land at Aston Road
- Down Ampney - DA2 Dukes Field
- Kemble - K2 Land at Station Road

2.15 Any new evidence submitted on proposed sites will be reviewed through the Local Plan site assessment process, which will inform the preparation of the Reg.19 consultation on the 'Whole Local Plan'. It is possible that this could lead to the deletion of certain sites. Some representations have put forward alternative sites for consideration, and these have been fed into the 2015 update of the SHLAA/SELAA. However, the decision on whether it will be necessary to propose additional sites for allocation will not be made until the housing requirement figure has been updated further to take account of the latest available demographic and economic data.

Rural housing

2.16 Many of the 50 or so respondents on this section supported the principle of allowing more development in rural settlements, and the Rural Housing Policy (Policy SP7) was also strongly supported by some rural parish councils.

2.17 This was, however, countered by numerous claims that SP7 contradicts national policy however, including:

- the policy should be amended to include the special circumstances outlined in NPPF 55,
- references to affordable housing contributions should comply with NPPG, and
- the approach is contrary to the guidance in NPPF 113, NPPF 132 and 135.

2.18 Parts of draft SP7 have been overtaken by updated national planning policy. The policy covers aspects of policies that were subsequently proposed in the Reg.18 consultation dealing with Development Management Policies.

Economy

2.19 There were 40 representations received. These mainly included concerns over the provision of sufficient employment land (too little or too much) based either on the location (Cirencester, Tetbury, rural areas) or the economic evidence used as a basis for future growth.

2.20 Comments were also made on the need to safeguard existing employment land, the loss of employment land, and the ability to deliver employment generating uses, including tourism. The policies were generally supported by the relevant statutory bodies and those welcoming employment land allocations to meet local employment needs.

Environment

2.21 47 comments raised various concerns about the generality and lack of specificity within the Natural and Historic Environment policy (Policy SP4), notably from statutory bodies:

- Although SP4's strategic commitment was welcomed, English Heritage felt it only appears to repeat the NPPF. Similarly while parts of SP4 are welcomed, Natural England identified conflict with NPPF and would like to see more detail in criteria (a) and (d).
- Policy SP4 is very generic and does not, for example, specifically protect the irreplaceable habitat of ancient woodland/ trees, or the AONB landscape.

2.22 It is noted that although SP4 is a 'high level' policy and more detail will be included in the Development Management Policies in due course, dialogue with statutory bodies such as EH, EA and NE will be essential through the DTC process.

Gypsy and Traveller Accommodation

2.23 A large number of representations received (c.5650). The overwhelming majority of representations related to the proposed sites at Seven Springs, Coberley, and virtually all of these were internet-generated. The main points of objection focussed on:

- unsustainable location;
- inappropriate development in the countryside;
- number of pitches relative to the size of the parish;
- loss of greenfield land;
- visual harm to Cotswolds AONB and views from Cotswold Way;
- allocation of GT8 (Seven Springs) is contrary to recent appeal decision;
- contrary to wishes of local community;

- fails to take into account emerging government advice on planning for traveller sites;
 - Gypsy and traveller sites should not be granted where permissions for the 'settled community' would be refused.
- 2.24 Other comments on gypsy and traveller sites were objections to other sites based primarily on the sites' locations i.e. within the AONB, conservation area, proximity to a settlement, or that they lacked access and/ or local services for example. Officer's response is that the sites will be reviewed, in due course, by a SHLAA Panel, which will take into account the latest available evidence and guidance.
- 2.25 Objections also raised concerns that the needs in Cotswold District by the 2013 GGTTSA had been significantly over-estimated, and that the emerging government advice on planning for traveller sites had not been taken into consideration. In 2013, the six Gloucestershire Authorities produced a joint GTTSA to provide updated evidence for their local plans covering the period to 2031, that evidence was based on up-to-date legislation at the time. Any further reassessment of need will be taken into consideration and inform the final site allocations.
- 2.26 Supportive comments focused on the idea of bringing together both houses and small Gypsy sites as an excellent idea and good for community relations; and that Gypsies are entitled to basic human rights and somewhere safe to live.

Local Green Spaces

- 2.27 158 comments were received. 93 of these comments were supportive, out of which 80 related to the allotments at Station Road, Blockley.
- 2.28 Objections were also received to the following, privately owned, sites:
- Conygree Mill - Blockley
 - The Humpty Dumps - Cirencester
 - Recreation Ground - Temple Guiting
 - Siddington Allotments
 - Siddington Playing Field
 - Kemble Recreation Ground
 - South Cerney Allotments
 - Manor Fields - Bourton-on-the-Water
- 2.29 The main reasons for objections included: interpretation of the NPPF; weak evidence; and lack of consistency in approach. Objections were also received regarding sites that have been dropped from the process. A small number were also received regarding possible amendments to site boundaries (Kemble and the Blockley Allotments).
- 2.30 The CPRE, GRCC, County Council, Sport England and the Cotswolds Conservation Board were all broadly supportive of the work.
- 2.31 Down Ampney, Chipping Campden and Stow-on-the-Wold have also expressed an interest in putting more sites forward.