

Summary of Representations

Made on the Reg.18 Consultation November 2015 Report

Planning Policies

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Date March 2016

Introduction

1. Following the approval of Cabinet in October 2015, the Local Plan Reg.18 Consultation: Planning Policies was formally published for a 6 week period of public consultation during November and December 2015.
2. In response 1707 representations were received from 344 individuals and organisations including members of the public , town and parish councils, other local authorities , infrastructure providers, agencies , action groups and developers/landowners . This level of response was much lower than had been received on the earlier Development Strategy and Site Allocations Reg.18 consultation, where the figures were 9960 and 2103 respectively.

Background

3. The Planning Policies document was designed to complement the earlier Reg.18 Consultation on the Development Strategy and Site Allocations which took place in January 2015. Its focus is on the non-strategic policies which the council will use, in due course, to assess planning applications. It also includes draft policies to guide development within and outside development boundaries and some locational issues which had not been covered in the earlier consultation, such as the Gloucester and Cheltenham Green Belt, Kemble Airfield and the Cotswold Water Park.

Key issues

Development Strategy

4. This section attracted over 270 representations. Many comments made on this section reiterated points in the previous consultation, notably objections to the Chesterton strategic allocation. Such points have been addressed elsewhere, under the appropriate sections of the document.
5. The development boundaries drew a number of comments, notably that if settlement boundaries are to remain, they should not be overly constrictive and should allow for the necessary scale of growth to be delivered across the district. Others said that the policy as worded states that employment development and rural housing development can take place adjacent to the development boundaries – this causes confusion about the role of development boundaries and undermines their effectiveness. Agreed to change to ensure there is adequate guidance to deal with proposals which might come forward for additional housing development adjacent to the 17 Principal Settlement development boundaries.

6. DS2 drew many comments, ranging from views that the policy is too restrictive to others who felt that the criteria should be tightened to ensure that this policy enables genuine small-scale developments supported by local communities. It is recognised that the DS2 criteria are vague and it is agreed that the wording should be tightened.

Housing

7. This section attracted 193 representations.

Affordable Housing

8. This policy received 94 representations .In relation to affordable housing, many commentators pointed out that additional supporting evidence is required to justify the percentage of affordable housing required under policy H1. This is acknowledged and further evidence from the Viability Study and updated SHMA will be used to inform the final percentage to be proposed in the Reg. 19 version of the Local Plan.
9. Others commented that affordable housing will be built in the wrong places for those in need with a disproportionate amount to be located in Cirencester. In the same vein, others said that affordable housing should be available for local people based on real affordability levels, as current models are still out of reach to many Cotswold residents. Also concerns were raised over issues that are not within the policy remit of the Local Plan, for example affordable housing will become second homes; the Council should work with the Private Rented Sector and set up innovative schemes for affordable house provision; S106 agreements should be tightened up to prevent any amendments being made by developers and there should be a policy for existing affordable housing to be revitalised by the Housing Associations.

Housing Mix and Tenure

10. 47 representations were made to this Policy. Objections were made to the self-build threshold level or the 5% figure, as no justification is given for this. Others said that the policy on self-build and starter homes should reflect the latest government guidance. Self-build is supported, but should come through via negotiation depending on site circumstance and viability; it should boost supply not restrict other sites.
11. It is recognised that this policy is work in progress and needs to be informed by evidence from the updated SHMA and government guidance which is currently in draft form and is expected to be finalised as the Reg.19 version of the Local Plan is being drawn up. The council anticipates that it will implement Government guidance on custom and self-build, which should provide mechanisms to help with delivery of these schemes.
12. More policy should be included to provide for the needs of older people in line with PPG. This is acknowledged and evidence is being gathered through the updated SHMA to inform policy.

Dwellings for Rural Workers outside Settlements

13. 10 representations / comments received on this section.

14. Commentators said that the policy, as drafted, does not reflect changes to the NPPF and the abolition of previous PPS without replacing it. Policy needs strengthening and clarifying to specify other workers to which the policy might apply. Other detailed wording changes were suggested and will be taken on board, along with ensuring that the policy is aligned with guidance on the NPPF and PPG.

Gypsy, traveller & travelling showpeople sites

15. This section attracted 19 representations.

16. With the passage of the Housing and Planning Bill through parliament, local planning authorities will no longer be required to make separate assessments of gypsy and traveller needs and this policy may no longer be needed as this segment of the population would be treated no differently from others in the plan policies which applied to their accommodation.

17. A number of commentators said that H4 would encourage further inappropriate development of Gypsy and Traveller sites within the AONB and other designated areas, contrary to guidance.

18. Detailed comments were also made about adding an additional locational criterion regarding whether a site would be capable of providing adequate on-site services. One commentator said that where the extension of existing traveller sites is considered, an impact assessment should be carried out to measure the effect on neighbouring communities.

Residential Care Accommodation

19. 17 representations comments made on this section. The main point made was that the council should include targets for specialist housing types or identify shortfalls of a particular accommodation type to result in a more positive policy. This will be picked up through the work on the updated SHMA which will provide the basis for a more robust policy.

Removal of Occupancy Conditions

20. Only 6 representations were made on this policy, mainly to do with minor policy wording issues.

Economy and Retail

21. 204 representations were received on this section as a whole.

Local Plan Economic Strategy

22. In terms of the overall economic strategy, commentators said that the evidence and analysis does not distinguish sufficiently between different parts of the District; there was insufficient detail for Cirencester and some had spotted some ambiguous or minor errors.

23. Others suggested that the development strategy will increase commuting and was unsustainable; in particular the Cirencester Strategy will cause gridlock, commuting was not justified and would create a dormitory town for which demand was not demonstrated.

24. The Council will ensure that there is a robust evidence base in place to justify the development strategy. These issues will be addressed by updated data and analysis, as appropriate and the Reg.19 Local Plan will provide links to relevant documents and analysis. The Council recognises that commuting is a particular issue to/from Cirencester and in / out of the district.
25. An OAN update is in progress and supports the Council's view that the settlement / distribution strategy is sustainable; this will also be demonstrated through the updated Sustainability Appraisal.
26. Several commentators asked for greater clarity in policies (EC1 Existing Employment Sites) and EC3 (Proposals for new employment sites) to ensure that they are mutually compatible and it is clear which takes precedent and which criteria applies to each situation. A definition of an established employment site needs to be added. It was suggested that a delivery and implementation strategy for delivery of economic objectives and policies was needed, which focussed on using existing and vacant sites first; incentives might also be needed.

Special Policy Areas

27. The three Special Policy Area policies covering RAU Cirencester, Camden BRI and Fire Services College (Moreton-in-Marsh) all attracted detailed site specific comments which will be addressed by reviewing the policy requirements and amending the relevant policy wording. Comments were also made regarding employment allocations. In particular, a large proportion of the Tetbury allocation is not available for development. This will be addressed through refreshing the site allocations and policy redrafting. Other comments promoted employment sites. These have been fed into the SELAA process and will be reviewed.
28. Other commentators said the plan should provide more support for overnight accommodation including holiday parks, static caravans and lodges which will promote overnight stays; the policy should clarify the terms of the type of accommodation to which it applies.

Retail

29. A general comment was made that the policies did not promote expansion opportunities for retail. Specifically it was suggested that Northleach town centre boundary should be expanded, to expand the retail offer at Fairford and to give a retail floorspace requirement for Bourton-on-the-Water. The policy requirements will be reviewed alongside consultation with statutory bodies.
30. Various points were made about the Cirencester retail / town centre strategy suggesting that it fails to consider inside / outside ring road issues and town centre growth at Cirencester will prejudice growth elsewhere. Some comments were also made on the clarity of the policies and adding relevant mapping.
31. An overall comment was that the monitoring section lacks specificity. The target is an accumulative target across all sites and should be specific to each policy and the indicators are generic. This section should begin to set out an early risk assessment to identify risks to delivery and how the plan will seek to redress those risks. Improved cross referencing to Appendix D and Chapter 6 is also required.

Design

32. 28 representations were made on this section. Only a small number of comments were made on this policy, related to its scope and the complementary Design Code (Appendix C). Officers are aware that the policy needs to be proportionate and not duplicate guidance in the NPPF and PPG, so no significant amendments are required, beyond adding a definition of some terms to the glossary.

Natural and Historic Environment

33. 133 representations made on this section.
34. A large number of comments were around the relationship between the policies and the NPPF and PPG. Officers are aware that the policy needs to be proportionate and not duplicate guidance in the NPPF and PPG, so no significant amendments are required in that specific respect.
35. A key concern raised by several nature conservation representations was around the “positive wording” of policies relating to protection of assets. To address these concerns, relevant policies have been redrafted to strengthen their protective aspects.
36. A developer challenged the protection afforded to Special Landscape Areas (SLAs); however, this designation has been successfully defended at appeal so there are no grounds for any change. Other comments related to the relative protection afforded to the Cotswold AONB and the SLAs and whether major development in the AONB should be tied down more precisely. These points will be considered and revisions made to policy wording if appropriate.
37. Natural England raised detailed points regarding the wording of policies EN3 and EN4 (see para 35 above) and officers are collaborating on revised versions of the policy to assist clarity.
38. A similar approach is being taken to representations from Historic England, given their status, like Natural England, as statutory consultees. The historic environment policies have been revised to improve clarity and aid interpretation.
39. A number of comments can be simply addressed by adding a definition of some terms to the glossary, e.g. “veteran trees”

Infrastructure

INF1- Infrastructure

40. 52 representations were made on this policy. Many of these remarked on the need for clear supporting evidence, either generally or for particular locations, which is to be provided through the IDP. Officers will review the policy, taking account of the findings of the final IDP and the settlement based infrastructure guidance to be included in the settlement policies section of the Local Plan.

INF2 CIL and Developer Contributions

41. 13 representations made on this policy. These were mainly detailed comments focussed around the practicalities of CIL and how the Council was going to move forward with its preparation. This policy will be updated in the light of comments and the current position in relation to CIL and the supporting evidence, notably the IDP and Viability Study.

INF3 Social and Community Infrastructure

42. 139 representations were made on this section. Over three quarters of the representations were around Kemble Community Gardens, with commentators pointing out that the existing facility provides social and recreational facilities to the village, and with further development in the village being planned, it is important that the space is retained and conserved.
43. Various comments about infrastructure provision in particular settlements or locations were made and particular concerns were raised about the provision of allotments.

INF4-7 Movement and Connectivity

44. 77 comments made on these four policies. A general theme in the comments on this section are issues around transport infrastructure – such as traffic congestion at peak times in Cirencester, concerns about parking provision, lack of public transport alternatives to the car and a lack of footpaths and cycle-ways to facilitate modal shift. Whilst the new policies seek to address these concerns, the Local Transport Plan prepared by the County Council has a key role to play in these areas. It is important to note that the Local Plan needs to be read in conjunction with the Local Transport Plan in respect of strategic transport planning.
45. It is acknowledged that that the Local Plan can only provide high level guidance and most of the detail on highway matters will be addressed through the development management system. The Council will also work with Gloucestershire County Council, as highway authority, to ensure that the necessary supporting transport assessments etc. are prepared to support the Local Plan. Officers have worked in co-operation with County Council colleagues to develop the relevant policies.

INF8 Green Infrastructure

46. 12 representations were made on this section, suggesting minor wording changes and an addition to the glossary.

INF9 Flooding

47. 55 representations were made on this policy. A number of these flagged up flood risks on particular sites and in certain settlements, suggesting that development should not take place until the flood risk issues had been addressed. Others said that local information from communities and parish councils around flood risk issues should be used more widely by the council and statutory bodies in their decision-making. Detailed comments were also made about the wording of the policy. These points will be addressed through policy redrafting and, where appropriate, in the policy guidance for individual sites and settlements.

INF10 Telecommunications Infrastructure

48. 6 representations made on this policy, mainly to do with policy wording, which will be addressed.

INF11 Renewable and Low Carbon Energy Development

49. 14 representations made on this policy. Different views were expressed about whether the policy should cover wind related development such as wind farms. Officers will review NPPF guidance and ensure that the updated policy is NPPF compliant. A number of detailed wording changes were proposed which will be considered.

INF12 On-site Energy Generation Measures for New Developments

50. 7 representations were made on this policy. Several commentators suggested that, due to the Housing Standards Review, Government is to stop requiring renewable energy on site as a matter of course. Development should only meet the national standard unless there is evidenced local need. Until there is a justification for such a policy it will be found unsound. The need for this policy will be reviewed in light of the new Building Regulation requirements.

Other Spatial Issues

Cirencester Town Centre Strategy

51. 32 representations were made on the proposed Strategy, which were generally supportive. Cirencester Town Council indicated that there were two significant omissions from the Strategy: Key Views and the Amphitheatre Master Plan. Others felt the Strategy should refer to the lack of parking. Apart from this, comments were mostly restricted to minor matters of clarification.
52. Some minor amendments will be made to incorporate these comments. Consideration will be given to converting the Strategy into a series of policies.

SP1 Gloucester and Cheltenham Green Belt

53. Only two representations were made, neither of which require any policy rewording.

SP2 Kemble Airfield

54. 28 representations were made on this policy. Several comments reiterated points made elsewhere, notably comparing the merits of a new settlement at Kemble Airfield with the Chesterton strategic allocation. Some commentators suggest that there is overlap with other policies in the plan.
55. Others stated that Kemble Airfield is a remote location separate from any area of housing and unsuitable for any further employment development, suggesting that the policy should be strengthened to presume against further development at the airfield and to only permit it if it can be shown to be sustainable or capable of being made sustainable. It was also suggested that reference to the undesirability of residential development in the text were unnecessary and should be removed.

56. Various policy and supporting text changes will be made to address these issues.

SP3 and SP4 Thames and Severn Canal and the River Thames

57. Only 6 representations were made on these policies, all relating to minor wording points.

SP5 Cotswold Water Park

58. 30 representations were made on this policy. These ranged from comments on the boundary of the allocation, concern that reference to Upper Thames Clay Vales diminished the CWP 'brand', as well as detailed comments on the supporting text and particularly the feasibility of potential land uses. The Cotswold Water Park Trust also made a number of detailed comments, including the suggestion that the Objectives in the CWP Vision and Implementation Plan should be referred to in the Local Plan.
59. To address these issues, further redrafting is under way. Most of these are minor changes, though further consideration is being given as to whether it would be appropriate to incorporate the Objectives of the CWP Vision and Implementation Plan.

Development Boundaries for Cirencester and Principal Settlements

60. This section attracted 260 comments. Objections were made to the development boundaries proposed for all the Principal Settlements with the exception of Mickleton and Upper Rissington. By and large, objections centred around the housing allocations which commentators wished to see deleted from the Local Plan and proposed a subsequent adjustment to the development boundary.
61. Each of the development allocations and development boundaries is being updated and reviewed as part of the preparation of the Reg.19 Local Plan. However, given that the overall housing requirement of the District has risen since the January Reg18 consultation, it is likely that all the proposed allocations will be required.

Primary/Key/District/Local Centre (Town) Boundaries

62. 3 comments were made – these related to the detailed boundaries of Fairford, Moreton-in-Marsh and Northleach town centres. Suggestions to extend the boundaries will be considered when the retail evidence is reviewed, and any amendments made to the boundaries will be included in the Reg.19 Local Plan document.

Cotswold Design Code

63. 33 comments were made on the Design Code and no major concerns were raised.

(END)