



1 March 2023

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CABINET MEMBER FOR DEVELOPMENT MANAGEMENT AND LICENSING - DECISION MAKING MEETINGS

A meeting of the Cabinet Member for Development Management and Licensing - Decision Making meetings will be held at Council Chamber - Trinity Road on **Thursday, 9 March 2023 at 4.00 pm.**

Rob Weaver
Chief Executive

Recording of Proceedings – The law allows the public proceedings of Council, Cabinet, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Administrator know prior to the date of the meeting.

AGENDA

1. **Declarations of Interest**

To note any declarations by the Member or officers.

2. **Neighbourhood Planning: Regulation 18 Decision on the Fairford Neighbourhood Development Plan (Pages 3 - 30)**

Purpose

To consider whether the Fairford Neighbourhood Plan, as modified, meets the Basic Conditions required by the Localism Act, and therefore proceeds to referendum.

Recommendation

I) That the Cabinet Member for Development Management and Licensing considers the recommendations of the examiner, and the proposed modifications, and agrees that the Plan meets the Basic Conditions

3. **Stow and the Swells Neighbourhood Plan (Pages 31 - 322)**

Purpose

To agree the Council's representation to the Regulation 14 Consultation on the Stow and the Swells Neighbourhood Development Plan

Recommendation

That the Cabinet Member for Development Management and Licensing considers the draft representation presented at Annex B, and subject to any amendments, agrees this for submission to Stow Town Council

(END)

Agenda Item 2



COTSWOLD
DISTRICT COUNCIL

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	Cabinet Member for Development Management and Licensing Decision Meeting – February, 2022
Subject	NEIGHBOURHOOD PLANNING: REGULATION 18 DECISION ON THE FAIRFORD NEIGHBOURHOOD DEVELOPMENT PLAN
Wards affected	Fairford North, Lechlade, Kempsford and Fairford South
Accountable member	Cllr Juliet Layton Email: juliet.layton@cotswold.gov.uk
Accountable officer	Joseph Walker, Community Partnerships Officer Email: joseph.walker@cotswold.gov.uk
Summary/Purpose	To consider whether the Fairford Neighbourhood Plan, as modified, meets the Basic Conditions required by the Localism Act, and therefore proceeds to referendum.
Annexes	Annex A: Examiner's Report on the Fairford Neighbourhood Plan Annex B: Table of Modifications
Recommendation(s)	<i>1) That the Cabinet Member for Development Management and Licensing considers the recommendations of the examiner, and the proposed modifications, and agrees that the Plan meets the Basic Conditions</i>



Corporate priorities	<ul style="list-style-type: none">• Responding to the challenges presented by the climate crisis• Providing good quality social rented homes• Presenting a local plan that's green to the core• Helping residents and communities access the support they need for good health and wellbeing• Supporting businesses to grow in a green, sustainable manner, and to provide high value jobs <p>Neighbourhood Plans are prepared by or on behalf of parish councils, and express their priorities, albeit that they need to be in general conformity with the policies of the Local Plan. In this instance, the ambitions of Fairford Town Council align well with the Council's Corporate Priorities, as the Plan contains planning policies seeking to deliver housing, address climate change, promote residents' health and wellbeing and support local businesses.</p>
Key Decision	NO
Exempt	NO
Consultees/ Consultation	The draft plan was consulted upon by Fairford Town Council, and subsequently by Cotswold District Council, in line with the statutory requirements of the Neighbourhood Planning process.



1. BACKGROUND

- 1.1** Fairford Town Council (FTC) applied to Cotswold District Council (CDC) in late 2013 to designate a Neighbourhood Area. The area applied for, and subsequently approved, was the then-future boundaries of the parish which came into effect in 2015. An earlier version of the Fairford Neighbourhood Development Plan (FNDP) was submitted in 2017. This Plan failed independent examination, so since that date, FTC has been addressing the concerns raised, and responding to changing circumstances. The amended Plan was duly consulted upon in autumn 2020 and representations were considered in preparing a submission draft, submitted to CDC in September 2022. Regulation 16 consultation was launched on 1 November 2022, closing on 13 December 2022, and the Independent Examination commenced immediately thereafter. On 1 February 2023 the examiner issued his report, a decision on which is the subject of this report.

2. MAIN POINTS

- 2.1** Following the prescribed process for neighbourhood plans, Cotswold District Council procured an independent examination of the Fairford Neighbourhood Development Plan (NDP) from an experienced examiner, Andrew Mead ('the examiner'). This examination process is typically carried out using written representations, so is effectively a desk-based exercise, supplemented with a visit to the neighbourhood area. The examiner issued his final report on 1 February 2023.
- 2.2** The examiner concluded that the NDP, as modified following his recommendations, meets the Basic Conditions laid out in law for neighbourhood plans, and should proceed to referendum, and that the referendum covers the area of the plan, that is, Fairford Parish.
- 2.3** It is the role of this Council to make the changes recommended by the examiner, in consultation with the qualifying body. It should be noted that the examiner's recommendations are exactly that, and are not binding, but any material variation from these modifications would require a further consultation period. These recommendations (contained in the examiner's report at Annex A) and subsequent modifications are highlighted in table form at Appendix B. It should be noted that the examiner also noted a number of non-material changes could sensibly be made, to reflect: the modifications in the supporting text; changing circumstances, and; observations made in representations at the Regulation 16 stage.
- 2.4** Subject to the decision on this report, the FNDP will proceed to referendum on 4 May 2023, alongside the other ballots scheduled for this date. This timeframe is within the usual window for a neighbourhood plan to proceed to referendum.

3. FINANCIAL IMPLICATIONS

- 3.1** This decision will enable the Council to draw down grant from the Department of Levelling Up, Communities and Housing. While this is set at a standard rate of £20,000, in this instance it will cover the costs of the examination and the referendum, and recoup some of the other costs CDC has incurred supporting the FNDP to reach this stage.



4. LEGAL IMPLICATIONS

- 4.1** Making a decision on this report is a statutory duty. While the Council is expected to take on board the examiner's findings, these are non-binding, and the decision is the Council's. This decision will give the plan significant weight in planning decisions, as noted above, but will still need to be subject to a referendum and a final, formal decision to make the plan.

5. RISK ASSESSMENT

- 5.1** This is part of a statutory process and a decision that must be made. To mitigate the risk that there is a challenge to the Council's decision, the Council has participated fully in this process to ensure that the presented plan and the preparatory process is technically and legally robust.

6. EQUALITIES IMPACT

- 6.1** Not required for this decision, but it should be noted that the Examiner has considered Human Rights requirements in his report, and concluded that he is satisfied that the policies will not have a discriminatory impact on any particular group of individuals.

7. CLIMATE CHANGE IMPLICATIONS

- 7.1** None for this decision.

8. ALTERNATIVE OPTIONS

- 8.1** None for this decision

9. BACKGROUND PAPERS

- 9.1** None

Report on the Fairford Neighbourhood Plan 2020 - 2031

An Examination undertaken for Cotswold District Council with the support of Fairford Town Council on the September 2022 submission version of the Plan.

Independent Examiner: Andrew Mead BSc (Hons) MRTPI MIQ

Date of Report: 1 February 2023

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Main Findings - Executive Summary

From my examination of the Fairford Neighbourhood Plan (FNP/the Plan) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Fairford Town Council;
- The Plan has been prepared for an area properly designated – the Parish of Fairford as shown in Figure 1 Plan A on page 1 of the Plan;
- The Plan specifies the period during which it is to take effect: 2020 - 2031; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Fairford Neighbourhood Plan 2020–2031

- 1.1 Fairford Parish has a population of about 4,500¹, which includes the charming town of Fairford and the nearby small settlement of Horcott. Fairford is located about 14 km to the east of Cirencester in the shallow valley of the River Coln which passes through the centre of the town. The surrounding landscape is mostly agricultural with the large active base of RAF Fairford partly within the Plan area and to the south; and a series of lakes formed from the flooded former gravel pits constituting part of the Cotswold Water Park to the south east.
- 1.2 The formal process to prepare a neighbourhood plan for Fairford began in 2013 when Fairford Town Council (FTC) applied to Cotswold District Council (CDC) for the designation of the neighbourhood area which was approved in November 2013. An initial version of the Plan was produced but was later withdrawn following the recommendation of the examiner not to proceed to referendum. A new Steering Group was formed. The Plan was revised and it was finally submitted to CDC in October 2022.

¹ FNP: paragraph 2.34.

The Independent Examiner

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the FNP by CDC with the agreement of FTC.
- 1.4 I am a chartered town planner and former government Planning Inspector and have experience of examining neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the Plan.

The Scope of the Examination

- 1.5 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
 - Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.

- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').
- 1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.8 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan for the area;
 - be compatible with and not breach European Union (EU) obligations (under retained EU law)²; and
 - meet prescribed conditions and comply with prescribed matters.
- 1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Plan does not breach the requirement of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.³

2. Approach to the Examination

Planning Policy Context

- 2.1 The current Development Plan for Fairford, excluding policies relating to minerals and waste development, is the Cotswold District Local Plan 2011–2031 (CDLP) which was adopted in August 2018.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published in July 2021 and all references in this report are to the July 2021 NPPF and its accompanying PPG.

² The existing body of environmental regulation is retained in UK law.

³ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, as well as those submitted which include:
- the draft Fairford Neighbourhood Plan 2020–2031, dated September 2022;
 - the map on page 1 of the Plan which identifies the area to which the proposed Neighbourhood Plan relates;
 - the Consultation Statement, dated September 2022;
 - the Basic Conditions Statement, dated August 2022;
 - the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), dated December 2021;
 - the Habitat Regulations Assessment, dated September 2022;
 - the Fairford Neighbourhood Plan Site Assessment Report, dated February 2019;
 - the Landscape and Local Green Space Study, dated February 2022;
 - the Fairford Character Design Assessment, dated September 2022;
 - all the representations that have been made in accordance with the Regulation 16 consultation; and
 - the request for additional clarification sought in my letter of 21 December 2022 to CDC and FTC and their joint response dated 16 January 2023.⁴

Site Visit

- 2.4 I made an unaccompanied site inspection to the FNP area on 20 December 2022 to familiarise myself with it and visit relevant locations referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. No requests for a hearing session were received.

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix to this report.

⁴ View all the all the relevant Plan documentation, including the core submission documents and correspondence at: <https://www.cotswold.gov.uk/planning-and-building/planning-policy/neighbourhood-planning/fairford-neighbourhood-plan/>

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Fairford Neighbourhood Plan has been prepared and submitted for examination by FTC, which is a qualifying body. The FNP extends over all the area administered by FTC. This constitutes the area of the Plan designated by CDC in November 2013.

Plan Period

- 3.2 The Plan specifies the Plan period as 2020 to 2031.

Neighbourhood Plan Preparation and Consultation

- 3.3 The current submitted Plan is a development from the original Neighbourhood Plan which was the subject of examination in 2017 in which the examiner recommended that the Plan should not progress to referendum. CDC accepted this recommendation in October 2017. The preparation of the original Neighbourhood Plan was preceded by the Fairford Health Check (2005), Fairford Horizon 2011- 2016 (2011) and the Fairford Community Plan (2014). The Town Council resolved that the vision and aims of the Community Plan should be incorporated into the original Neighbourhood Plan. Some of the results of the consultation process for the original Plan were carried over into the current Plan, including the household questionnaire, the business questionnaire and the issues which were identified and the comments received.
- 3.4 The Pre Submission Plan was published for consultation under Regulation 14 of the 2012 Regulations from 28 September 2020 for a period of six weeks until 9 November 2020. The list of consultees is recorded in the Consultation Statement (CS) together with the comments made, the responses by the Town Council and any resulting changes to the Plan. These are described on pages 11 – 30 of the CS.
- 3.5 The Plan was finally submitted to CDC in October 2022. Consultation in accordance with Regulation 16 was carried out for six weeks from 31 October until 13 December 2022. 14 representations were received. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the FNP, that has had regard to advice in the PPG on plan preparation and engagement and is procedurally compliant in accordance with the legal requirements.

Development and Use of Land

- 3.6 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.7 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.8 The Basic Conditions Statement (BCS) advises that the Town Council has been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and considers that it complies with the Human Rights Act. I am aware from the Consultation Statement that considerable emphasis was placed throughout the consultation process to ensure that no sections of the community were isolated or excluded. I have considered this matter independently and I have found no reason to disagree with the statement in the BCS and I am satisfied that the policies will not have a discriminatory impact on any particular group of individuals.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The report of the Sustainability Appraisal (SA) incorporating the Strategic Environmental Assessment (SEA) concluded that the Plan is likely to lead to significant long term positive effects (population and community, health and wellbeing, economy and enterprise), some minor positive effects (biodiversity) and some minor long term negative effects (land soil and water) which are due to the development and associated infrastructure on land between Leafield Road and Hatherop Road. These latter negative effects are not anticipated to be significant. The three statutory consultees were notified of the report at the Regulation 16 consultation and made no adverse comments.
- 4.2 So far as Habitats Regulations Assessment (HRA) is concerned, the River North Meadow and Clattinger Farm Special Area of Conservation (SAC), 105ha in size, is located about 5.5km to the south west of the Plan area. The HRA report concluded that the SAC is sensitive to recreational pressure, changes in water quality, quantity, level and flow and atmospheric pollution as a result of development in the Plan. However, subsequent screening eliminated water quality and atmospheric pollution from the need for Appropriate Assessment (AA). Further screening concluded that recreational pressure due to the development of up to 80 dwellings in the Plan area, especially in combination with housing growth set out for the District in the CDLP, could give rise to likely significant adverse effects.
- 4.3 Nevertheless, with the addition of the need for developers of the site allocated for housing in Policy FNP14 of the Plan to comply with the Interim Mitigation Strategy for North Meadow devised by CDC, it could be

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concluded that the Plan will not result in “in-combination” adverse effects on the integrity of the SAC regarding recreational pressure. Similarly, it was concluded that the Plan will not result in “in-combination” adverse effects on the integrity of the SAC regarding water quantity, level and flow. Therefore, overall, CDC concluded that there are likely to be no significant effects either alone or in-combination from the Plan on the SAC. Having considered that assessment, Natural England concurred with the conclusions.⁵

- 4.4 I have read the SEA and HRA Screening Report and the other information provided, and having considered the matter independently, I also agree with the conclusions. Therefore, I am satisfied that the FNP is compatible with EU obligations.

Main Issues

- 4.5 Having considered whether the Plan complies with various procedural and legal requirements, it is now necessary to deal with whether it complies with the remaining Basic Conditions, particularly the regard it pays to national policy and guidance, the contribution it makes to the achievement of sustainable development and whether it is in general conformity with strategic development plan policies. I test the Plan against the Basic Conditions by considering specific issues of compliance of all the Plan’s policies.
- 4.6 As part of that assessment, I consider whether the policies are sufficiently clear and unambiguous, having regard to advice in the PPG. A neighbourhood plan policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.⁶
- 4.7 Accordingly, having regard to the Fairford Neighbourhood Plan, the consultation responses, other evidence⁷ and the site visit, I consider that the main issues in this examination are whether the FNP policies (i) have regard to national policy and guidance, (ii) are in general conformity with the adopted strategic planning policies and (iii) would contribute to the achievement of sustainable development? I shall assess these issues by considering the policies within the themes in the sequence in which they appear in the Plan.

Vision and Objectives

- 4.8 The overall vision for the FNP is first described on page iv of the Plan and which is then comprehensively expanded on page 31. The vision is then

⁵ Reply from Natural England, dated 6 May 2022.

⁶ PPG Reference ID: 41-041-20140306.

⁷ The other evidence includes the joint response from CDC and FTC received on 16 January 2023 to the questions in my letter of 21 December 2022.

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used to develop 19 objectives grouped into the themes of: natural and historic environment; climate change; housing provision and mix; community and business infrastructure; and local economy and town centre. These set the context for the subsequent land use policies.

FNP1 The Fairford and Horcott Development Boundaries (Policy FNP1.1)

- 4.9 Policy FNP1.1 redefines Development Boundaries for Fairford and Horcott as shown on the Policies Map (Plan B). Policy DS1 of the CDLP defines Fairford as a Principal Settlement in which Policy DS2 of the CDLP indicates that within the Development Boundaries, applications for development will be permissible in principle. The Development Boundary has been adjusted from that shown in Inset 4 of the CDLP to exclude housing site allocation F_35B which is now deemed by the Plan and agreed by CDC, to be undeliverable. An alternative housing allocation is proposed which is provided for under Policy FNP14.1. I consider that Policy FNP1.1 has regard to national guidance⁸, generally conforms with Policies DS1, DS2, DS3 and DS4 of the CDLP and meets the Basic Conditions.
- 4.10 Representations were made to allocate further sites for housing on land at Pengerric, and east of Beaumoor Place, East End, Fairford; on land at Fairford Town Football Club; and on land south of London Road, Fairford. Fairford is a Principal Settlement in the CDLP at which, under Policy S5, two sites for housing were allocated: F_35B for 49 dwellings (net) and F_44 for 12 dwellings (net). In the Regulation 16 consultation response, CDC commented that, as well as F_35B becoming unavailable, F_44 has been reassessed as unsuitable given a recent SSSI designation. The alternative site allocation proposed in the FNP under Policy FNP14.1 would accommodate around 80 dwellings and I conclude below that the allocation meets the Basic Conditions. Therefore, given the proposed FNP allocation would more than offset the loss of CDLP allocations F_35B and F_44, I have no reason to agree to the further site allocations which are the subject of the representations.

FNP2 Providing a New Burial Ground (Policy FNP2.1)

- 4.11 Policy FNP2.1 supports the provision of a new burial ground subject to three site specific criteria. The policy has regard to national guidance⁹, generally conforms with Policy S5(d) of the CDLP and meets the Basic Conditions.

FNP3 Maintaining Viable Community Facilities (Policy FNP3.1)

- 4.12 Policy FNP3.1 lists twelve community facilities which the Plan seeks to protect and improve through policies in the CDLP. A map of the facilities is shown in Appendix 1 of the Plan (Map D). I note that Riverside Gardens is

⁸ NPPF: paragraph 29.

⁹ NPPF: paragraph 93.

not shown on Map D despite being included at I) in the list. Therefore, subject to a modification to Map D to show Riverside Gardens, the policy would have regard to national guidance¹⁰, generally conform with Policy INF2 of the CDLP and meet the Basic Conditions. **(PM1)**

FNPF4 Managing Flood Risk (Policies FNP4.1, FNP4.2, FNP4.3 & FNP4.4)

- 4.13 The series of policies within FNP4 seek to manage flood risk. Policy 4.1 states that all sources of flood risk must be considered at both site selection and application stages. No mention is made of the exception test outlined in paragraphs 163 to 166 of the NPPF. In addition, a more nuanced approach is described in the NPPF indicating that where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, if circumstances change as explained in the NPPF, the exception test may need to be reapplied. The second sentence of Policy FNP4.1 merely repeats part of NPPF paragraph 162 and is superfluous. I have recommended a modified policy below. **(PM2)**
- 4.14 Policy FNP4.2 requires the submission of a Flood Risk Assessment (FRA) for proposals within Flood Zones 2 or 3 and within Flood Zone 1 where there is evidence of flood risk from sources other than fluvial. However, as identified in footnote 55 at NPPF paragraph 167, there are several other circumstances where an Assessment in Flood Zone 1 would be required. In addition, there is no requirement to manage residual flood risk wholly on site.¹¹ I shall recommend a modified policy below. **(PM3)**
- 4.15 Policy FNP4.3 is unnecessary due to the previous policy where support is conditional on certain specific circumstances and should be deleted. **(PM4)**
- 4.16 Policy FNP4.4 states that land in Flood Zone 1, where high groundwater levels would preclude sustainable drainage systems (SuDS), should be preserved as green space to provide for flood water storage/attenuation. However, the advice in the PPG section on 'Flood risk and coastal change' does not exclude the possibility of flood water being exported from sites as shown in paragraphs 37 and 56¹² and so the land in question need not be preserved as green space. Therefore, I consider that Policy FNP4.4 does not have regard to national guidance and recommend that it should be deleted. **(PM5)**
- 4.17 Therefore, with the recommended modifications, Policies FNP4.1 and FNP4.2 have regard to national guidance, generally conform with Policy EN14 of the CDLP and meet the Basic Conditions. I note the additions suggested to Policies FNP4.1 and FNP4.2 by FTC in Appendix 2 of the response to my questions, but these comments are more in nature of

¹⁰ NPPF: paragraph 93.

¹¹ PPG Reference ID: 7-049-20220825.

¹² PPG References ID: 7-037-20220825 & 7-056-20220825.

justification of the policies and, if included, could usefully be introduced into the evidence section.

FNPF Investing in Utilities' Infrastructure Improvements (Policies FNP5.1, FNP5.2, FNP5.3, FNP5.4 & FNP5.5)

- 4.18 Five policies consider investment in improvements to utilities infrastructure, the last of which, FNP5.5, dealing with electric vehicle charging points, is now covered by the recently approved Building Regulations Part S which came into effect in June 2022.¹³ Therefore, I shall recommend the deletion of Policy FNP5.5. **(PM6)**
- 4.19 Each of the remaining policies in the FNP5 section has regard to national guidance¹⁴, generally conforms with Policies INF1 and INF8 of the CDLP and meets the Basic Conditions.

FNPF Managing Traffic in the Town (Policies FNP6.1 & FNP6.2)

- 4.20 Policy FNP6.1 aims to manage traffic passing through the town centre and the Conservation Area so that harm is avoided, especially to the heritage assets. The policy would have regard to national guidance, would generally conform with Policy INF3 of the CDLP and meet the Basic Conditions subject to the clarification of the use of the word "harm" in the policy. This is normally qualified by the adjective "severe" (NPPF paragraph 111), but the context relates to impacts on the road network, rather than harm to heritage assets. Nevertheless, the substitution by the phrase "adverse effects" from NPPF paragraph 104 d) would be more appropriate, in my opinion, and which I shall recommend. **(PM7)**
- 4.21 FNP6.2 considers electric car charging in Transport Assessments and, for the same reasons as Policy FNP5.5 above, I shall recommend its deletion. **(PM8)**

FNPF Improving Access to Visitor Attractions (Policy FNP7.1)

- 4.22 Policy FNP7.1 seeks to improve pedestrian and cycle access to visitor attractions in the Plan area and has regard to national guidance¹⁵, generally conforms with Policies S5, EC10 and INF3 of the CDLP and meets the Basic Conditions.

FNPF Protecting Local Green Spaces (Policies FNP8.1 & FNP8.2)

- 4.23 Policy FNP8.1 designates three Local Green Spaces (LGS). Policy FNP8.2 states that development within the LGS will only be permitted in very special circumstances. As explained in the NPPF, LGS designation should

¹³ The Building Regulations 2010: Infrastructure for the charging of electric vehicles: Approved document S.

¹⁴ NPPF: paragraph 82.

¹⁵ NPPF: paragraphs 84 & 106.

only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.¹⁶ LGS should also be capable of enduring beyond the end of the Plan period.¹⁷ Having visited each LGS on the site visit, I consider that they all meet the criteria for designation outlined in the NPPF. Therefore, I consider that Policies FNP8.1 and FNP8.2 have regard to national guidance, generally conform with Policy EN3 of the CDLP and meet the Basic Conditions.

FNP9 Protecting the Fairford – Horcott Local Gap (Policies FNP9.1 & FNP 9.2) FNP10 River Coln Valued Landscape (Policies FNP10.1 & FNP 10.2)

- 4.24 The policies dealing with the Fairford – Horcott Local Gap and the River Coln Valued Landscape are similar in that in each case land outside the Development Boundary should be protected from development subject to qualifications described in Policy FNP9.2 and Policy FNP10.2.
- 4.25 The policies have regard to national guidance¹⁸ and generally conform with Policies EN1 and EN4 in the CDLP. Policy DS4 of the CDLP recognises that certain development may occur outside Development Boundaries as identified in Policies H3, H5, H7 and EC6. However, such development would have to be considered against CDLP Policy EN4 (1) and should not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) and which I would interpret as not harming the open character of the Fairford – Horcott Local Gap and also ensuring that the essential open character of the River Coln Valued Landscape is maintained. Therefore, I consider that the policies meet the Basic Conditions.

FNP11 Valuing Hedgerows and Trees (Policies FNP11.1, FNP11.2 & FNP 11.3)

- 4.26 The three policies within the FNP11 section aim to provide detailed design guidance for managing the effects of development proposals on trees and hedgerows. The policies have regard to national guidance¹⁹, generally conform with Policy EN7 of the CDLP and meet the Basic Conditions.

FNP12 Achieving High Standards of Design (Policies FNP12.1 & FNP12.2)

- 4.27 Policy FNP12.1 contains twelve clauses aimed at achieving high standards of design. Policy FNP12.2 requires development to take account of the Fairford Design Code and/or any Fairford Conservation Area Appraisal and

¹⁶ NPPF: paragraph 102.

¹⁷ NPPF: paragraph 101.

¹⁸ NPPF: paragraph 174.

¹⁹ NPPF: paragraphs 131 & 179.

Management Plan. The policies have regard to national guidance²⁰, generally conform with Policy EN2 of the CDLP and meet the Basic Conditions, subject to the clarification of Clause k) which is currently drafted as a statement rather than policy and to which I shall recommend a modification incorporating the response made by FTC.²¹ **(PM9)** I also echo the complimentary comments by CDC about the extensive evidence base supporting these policies, especially the Fairford Character and Design Assessment which was a pleasure to read.

FNP13 Conserving Non-Designated Heritage Assets (Policies FNP13.1 & FNP13.2)

- 4.28 Policy FNP13.1 considers non-designated heritage assets (NDHA) and lists them in Appendix 2. The policy is confusing by defining the NDHA as Local Heritage Assets (LHA), which they are, but that definition would also include designated heritage assets such as Listed Buildings, Scheduled Monuments and Conservation Areas. Given that the policy is aimed at NDHA, the second sentence of the policy becomes ambiguous as well as inaccurate because it introduces a test of public benefit to outweigh any harm or loss which is appropriate for designated heritage assets but not for NDHA.²² The test for NDHA requires a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset²³ and, therefore, I shall recommend an appropriate modification below which will enable the policy to have regard to national guidance, generally conform with Policy EN12 of the CDLP and meet the Basic Conditions. **(PM10)**
- 4.29 Policy FNP13.2 provides for the evaluation and safeguarding of archaeological assets which are not yet designated as NDHA. The policy has regard to national guidance²⁴, generally conforms with Policy EN1 of the CDLP and meets the Basic Conditions.

FNP14 A New Low Carbon Community in Fairford (Policies FNP14.1, FNP14.2, & FNP14.3)

- 4.30 Policy FNP14.1 allocates land for about 80 homes between Leafield Road and Hatherop Road in Fairford. Policy FNP14.2 sets out criteria a) to l) which have to be satisfied in order for the development to be permitted. Policy FNP14.3 requires the mitigation of impacts on the North Meadow SAC at nearby Cricklade. Each policy would have regard to national guidance²⁵ and generally conform with Policy S5 of the CDLP, with one exception relating to criterion k) which considers how to deal with flood water. As explained above in relation to Policy FNP4.2, although it may be the first preference, there is no requirement to incorporate measures to

²⁰ NPPF: paragraphs 127, 128 & 190.

²¹ Joint response from CDC and FTC dated 16 January 2023.

²² NPPF: paragraph 202.

²³ NPPF: paragraph 203.

²⁴ NPPF: paragraph 194.

²⁵ NPPF: paragraphs 60, 62, 63, 65, 67, 69, 70, 124 & 128.

contain or attenuate surface water within the site or, indeed, on other land within the control of the landowner.²⁶ Accordingly, I shall recommend the deletion of the phrase: "... within the control of the landowner ...".
(PM11)

- 4.31 Representations from the Defence Infrastructure Organisation (DOI) sought a requirement in the Plan that new development would not compromise the safety of RAF Fairford, part of which is within the Plan area, and RAF Brize Norton, Oxfordshire. The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 already provides guidance and procedures to determine planning applications in safeguarded areas. In addition, the CDLP comments that procedures will be used in the development process to ensure that risks between aircraft movements and proposed developments are removed. Therefore, given that national guidance is to avoid unnecessary duplication of policies²⁷, I do not consider that an additional clause about safeguarding needs to be included in Policy FNP14.2. The policy already meets the Basic Conditions.

FNP15 Housing Type and Mix (Policies FNP15.1, FNP15.2 & FNP15.3)

- 4.32 Policies FNP15.1 and FNP15.2 consider housing type and mix have regard to national guidance²⁸, generally conform with Policy H1 of the CDLP and meet the Basic Conditions. Policy FNP15.3 seeks the provision of electric charging points but, as explained above in relation to Policy FNP5.5, the issue is now covered by recently published Building Regulations. Therefore, I shall recommend the deletion of the policy. **(PM12)**

FNP16 Zero Carbon Buildings (Policies FNP16.1, FNP16.2, FNP16.3)

- 4.33 Policies FNP16.1, FNP16.2 and FNP16.3 support the development of zero carbon buildings. The policies have regard to national guidance²⁹, generally conform with the Objective 6 a. of the CDLP and meet the Basic Conditions. The superfluous first phrase in Policy FNP16.1 referred to by CDC may be deleted as a minor correction.³⁰

FNP17 Growing our Local Economy (Policy FNP17.1)

- 4.34 Policy FNP17.1 supports the intensification of use of the Whelford Industrial Estate and has regard to national guidance³¹, generally conforms with Policies EC1 and EC2 of the CDLP and meets the Basic Conditions.

²⁶ PPG: Reference ID: 7-056-20220825.

²⁷ NPPF: paragraph 16 f).

²⁸ NPPF: paragraphs 62 & 133.

²⁹ NPPF: paragraphs 152, 153 & 157.

³⁰ PPG Reference ID: 41-106-20190509.

³¹ NPPF: paragraphs 82, 84 & 85.

FNP18 Sustaining a Successful Town Centre (Policies FNP18.1, FNP18.2, FNP18.3 & FNP18.4)

- 4.35 The policies in the FNP18 Section seek to sustain a successful town centre at Fairford and have regard to national guidance³², generally conform with Policy EC8 of the CDLP and meet the Basic Conditions with the exception of Policy FNP18.2 which virtually duplicates CDLP Policy EC8(5). CDC suggests placing an emphasis on the loss of town centre floorspace rather than the loss of a use and I agree that such an amendment would offer clarity in development management and would focus on the aim behind the policy of maintaining the vitality and viability of the centre. **(PM13)** Policy FNP18.2 would then meet the Basic Conditions.

FNP19 New Visitor Accommodation (Policy FNP19.1)

- 4.36 Policy FNP19.1³³ supports the development of new visitor accommodation and has regard to national guidance³⁴, generally conforms with Policy EC11 of the CDLP and meets the Basic Conditions. Paragraph 6.105 reads as a policy statement rather than evidence. I agree with the CDC suggestion that it could be promoted to a separate policy. However, to be in general conformity with Policy EC11(7) of the CDLP, I shall recommend the addition of the need to be related to main traffic routes. **(PM14)** The new policy would also have regard to national guidance as above and meet the Basic Conditions.

Overview

- 4.37 Therefore, on the evidence before me, with the recommended modifications, I consider that the policies within the FNP are in general conformity with the strategic policies of the CDLP, have regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.
- 4.38 A consequence of the acceptance of the recommended modifications would be that amendments would have to be made to the explanation within the Plan in order to make it logical and suitable for the referendum. These might also include incorporating factual updates, correcting minor inaccuracies, text improvements suggested helpfully by CDC in the Regulation 16 Consultation responses (and by both Councils in the joint response of 16 January 2023 to my questions of clarification) or in other Regulation 16 representations. None of these alterations would affect the ability of the Plan to meet the Basic Conditions and could be undertaken as minor, non-material changes.³⁵

³² NPPF: paragraph 86.

³³ A minor typo 'FNP1.1' should be corrected.

³⁴ NPPF: paragraph 84.

³⁵ PPG Reference ID: 41-106-20190509.

5. Conclusions

Summary

- 5.1 The Fairford Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the FNP, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The FNP as modified has no policy or proposal which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Concluding Comments

- 5.4 The Town Council, the Steering Group and other voluntary contributors are to be commended for their efforts in persevering beyond the first draft of the Plan to produce a second one which is both comprehensive and concise. The Plan is logical, very informative and well-illustrated. I enjoyed examining it and visiting the area. The Consultation Statement and especially the Basic Conditions Statement were extremely useful, as were the constructive responses from both Councils to my questions of clarification.
- 5.5 Subject to the recommended modifications, the FNP will make a positive contribution to the Development Plan for the area and should enable the attractive character and appearance of Fairford Parish to be maintained.

Andrew Mead

Examiner

Appendix: Modifications

Proposed modification no. (PM)	Page no./ other reference	Modification
PM1	Appendix 1 Map D	Include Riverside Gardens as shown on Appendix 1 of the joint response from CDC and FTC dated 16 January 2023.
PM2	Policy FNP4.1	Amend the policy to: "When proposals for development are being considered, all sources of flood risk must be considered at the appropriate stages and the sequential and exception tests used to divert development to areas with lower probability of flooding, in accordance with NPPF guidance."
PM3	Policy FNP4.2	Amend the policy to: "Proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in Flood Zone 1 in the circumstances outlined in footnote 55 of paragraph 167 of the July 2021 NPPF, will require a Flood Risk Assessment (FRA), using appropriate calculations based on the highest groundwater levels for the area (200 year maximum). Proposals will only be supported where it can be demonstrated in the FRA that: a) they include appropriate site specific measures to address effectively all the identified surface and groundwater issues; and b) any residual flood risk can be safely managed."
PM4	Policy FNP4.3	Delete the policy.
PM5	Policy FNP4.4	Delete the policy.
PM6	Policy FNP5.5	Delete the policy.
PM7	Policy FNP6.1	Twice in the final sentence delete: "... harm ..." and replace with: "... adverse effects ..." .

PM8	Policy FNP6.2	Delete the policy.
PM9	Policy FNP12.1 k)	Amend the clause to: "Crescents and cul-de-sac estates are not typical of old Fairford and are not encouraged in developments. Due consideration should be given to pedestrian/cycle connectivity and vehicle access resilience in the case of larger developments."
PM10	Policy FNP13.1	Amend the policy to: "The FNP identifies the buildings and structures, as listed in Appendix 2: List of Non-Designated Heritage Assets and shown on the Policies Map, as Non-Designated Heritage Assets by way of their local architectural or historic interest. Proposals that will result in harm to, or unnecessary loss of, a Non-Designated Heritage Asset will be considered having regard to the balance between the scale of any harm or loss and the significance of the asset."
PM11	Policy FNP14.2 I)	Delete: "... within the control of the landowner..." .
PM12	Policy FNP15.3	Delete the policy.
PM13	Policy FNP18.2	Amend the start of the second sentence of the policy to: "The loss of main town centre uses floorspace on the ground floor ..." .
PM14	Policy FNP19	Add a new policy: "FNP19.2 Proposals for camping facilities outside the defined Fairford Development Boundary will be supported provided there are not harmful effects on landscape and wildlife and the facility would be well related to the main tourist routes." Delete paragraph 6.105.

Appendix C: Modifications

Proposed modification no. (PM)	Page no./ other reference	Modification	Officer Recommendation
PM1	Appendix 1 Map D	Include Riverside Gardens as shown on Appendix 1 of the joint response from CDC and FTC dated 16 January 2023.	Agree, ensures that the mapping evidence supports the Plan text
PM2	Policy FNP4.1	Amend the policy to: "When proposals for development are being considered, all sources of flood risk must be considered at the appropriate stages and the sequential and exception tests used to divert development to areas with lower probability of flooding, in accordance with NPPF guidance."	Agree Ensures policy meets NPPF guidance
PM3	Policy FNP4.2	Amend the policy to: "Proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in Flood Zone 1 in the circumstances outlined in footnote 55 of paragraph 167 of NPPF, will require a Flood Risk Assessment (FRA), using appropriate calculations based on the highest groundwater levels for the area (200 year maximum). Proposals will only be	Agree Ensures policy meets NPPF guidance, whilst still taking account of the importance of this matter within Fairford.

		<p>supported where it can be demonstrated in the FRA that:</p> <p>a) they include appropriate site specific measures to address effectively all the identified surface and groundwater issues; and</p> <p>b) any residual flood risk can be safely managed.”</p>	
PM4	Policy FNP4.3	Delete the policy.	<p>Agree</p> <p>Ensures policy meets NNPF guidance</p>
PM5	Policy FNP4.4	Delete the policy.	<p>Agree</p> <p>Ensures policy meets NNPF guidance</p>
PM6	Policy FNP5.5	Delete the policy.	<p>Agree</p> <p>Avoids unnecessary duplication</p>
PM7	Policy FNP6.1	Twice in the final sentence delete: “... harm ...” and replace with: “... adverse effects ...”.	<p>Agree</p> <p>Avoids inadvertent read-across from existing planning meaning of a phrase.</p>
PM8	Policy FNP6.2	Delete the policy.	<p>Agree</p> <p>As with 5.5, avoids unnecessary duplication</p>

PM9	Policy FNP12.1 k)	Amend the clause to: "Crescents and cul-de-sac estates are not typical of old Fairford and are not encouraged in developments. Due consideration should be given to pedestrian/cycle connectivity and vehicle access resilience in the case of larger developments."	Agree Modification ensures the wording of the clause is framed as a policy, rather than a statement.
PM10	Policy FNP13.1	Amend the policy to: "The FNP identifies the buildings and structures, as listed in Appendix 2: List of Non-Designated Heritage Assets and shown on the Policies Map, as Non-Designated Heritage Assets by way of their local architectural or historic interest. Proposals that will result in harm to, or unnecessary loss of, a Non-Designated Heritage Asset will be considered having regard to the balance between the scale of any harm or loss and the significance of the asset."	Agree Modification ensures consistency with national guidance, and consistency of language to avoid confusion.
PM11	Policy FNP14.2 I)	Delete: "... within the control of the landowner..." .	Agree Ensures the policy is not more onerous than national guidance allows.
PM12	Policy FNP15.3	Delete the policy.	Agree As with 5.5, avoids unnecessary duplication

PM13	Policy FNP18.2	Amend the start of the second sentence of the policy to: "The loss of main town centre uses floorspace on the ground floor ..." .	Agree Makes the Development Management approach clear, and enhances the aim of the policy.
PM14	Policy FNP19	Add a new policy: "FNP19.2 Proposals for camping facilities outside the defined Fairford Development Boundary will be supported provided there are not harmful effects on landscape and wildlife and the facility would be well related to the main tourist routes." Delete paragraph 6.105.	Agree Enhances the plan, by ensuring an imperative statement is clearly viewed as a policy.

Agenda Item 3



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	Cabinet Member for Development Management and Licensing Decision Meeting – February, 2023
Subject	NEIGHBOURHOOD PLANNING: REPRESENTATION TO THE STOW AND THE SWELLS REGULATION 14 DRAFT CONSULTATION
Wards affected	Stow directly, Fosseridge
Accountable member	Cllr Juliet Layton Email: juliet.layton@cotswold.gov.uk
Accountable officer	Joseph Walker, Community Partnerships Officer Email: joseph.walker@cotswold.gov.uk
Summary/Purpose	To agree the Council's representation to the Regulation 14 Consultation on the Stow and the Swells Neighbourhood Development Plan
Annexes	Annex A Stow and the Swells Neighbourhood Plan: A1: Regulation 14 Draft A2: Draft Design Code A3: Draft Strategic Environmental Assessment A4: Housing Needs Assessment Annex B: Draft Cotswold District Council Representation
Recommendation(s)	1) <i>That the Cabinet Member for Development Management and Licensing considers the draft representation presented at Annex B, and subject to any amendments, agrees this for submission to Stow Town Council</i>



Corporate priorities	<ul style="list-style-type: none">• Responding to the challenges presented by the climate crisis• Providing good quality social rented homes• Presenting a local plan that's green to the core• Helping residents and communities access the support they need for good health and wellbeing• Supporting businesses to grow in a green, sustainable manner, and to provide high value jobs <p>Neighbourhood Plans are prepared by or on behalf of parish councils, and express their priorities, albeit that they need to be in general conformity with the policies of the Local Plan. In this instance, the ambitions of the Stow and the Swells Neighbourhood Plan complement the Council's Corporate Priorities, as the Plan contains planning policies seeking to deliver housing, address climate change, promote residents' health and wellbeing and support local businesses.</p>
Key Decision	NO
Exempt	NO
Consultees/ Consultation	<p>This report seeks agreement for a consultation response from this Council. It has been prepared with input from a number of officers with an interest in Neighbourhood Planning. Stow Town Council Council, as the body responsible for this plan, are legally bound to consult with defined statutory bodies and others whose interests are affected.</p>



1. BACKGROUND

Stow Town Council (STC) and Swell Parish Council (SPC) jointly agreed to designate their two parish areas as a neighbourhood area, for the purposes of developing a neighbourhood plan, in 2015. STC launched a consultation on the draft Neighbourhood Plan ('the Plan') on 6 February 2023, closing on 20 March 2023.

2. MAIN POINTS

- 2.1. STC initially submitted a request for area designation to this Council in 2012, when their parish boundaries were designated as a Neighbourhood Area. In 2015, at the joint request of STC and SPC, this designation was revoked, and a new area encompassing the full extent of both parishes was designated, Stow and the Swells (SSNP). The Neighbourhood Planning Regulations 2012 require that in a multi-parish area, one parish takes on the role of qualifying body, that is, the organisation legally capable of presenting a neighbourhood plan to the Local Planning Authority. STC took on this role. Since then, local residents, and more recently, professional planning consultancy support have been developing the evidence base and draft policies for this Neighbourhood Plan.
- 2.2. This Pre-submission Consultation presents an opportunity for this Council to comment formally on the Plan. The Plan has been circulated to officers from across the different Development Management disciplines.
- 2.3. The points raised in the draft representation attached at Annex 2 reflect officers' views on how the Plan fits with Policy and Regulation, and their views on whether its Policies will be usable. Officers have also commented where evidence might be lacking or subject to challenge, and where text is unclear, or where there are grammatical or typographical errors.

3. FINANCIAL IMPLICATIONS

- 3.1. None direct. Later stages in the development of the Plan require direct financial commitment from the Council, but under current arrangements, this is reimbursed by a grant from the Department for Levelling Up, Housing and Communities.

4. LEGAL IMPLICATIONS

The Localism Act 2011 establishes that the Council has a duty to support Neighbourhood Planning activity. This is generally interpreted as a requirement to engage constructively with Neighbourhood Planning groups throughout the Plan process, rather than limited to statutory processes.

5. RISK ASSESSMENT

- 5.1. Should the Council not respond at this stage, it misses a critical opportunity to influence the content of the emerging Plan. The risk here is twofold: should the Plan proceed with minimal changes through Regulation 16 and examination, there would be a greater risk of planning Policies which are difficult to implement or interpret, creating challenges for Development Management. There would also be a greater risk that the Plan would either fail examination, or be subject to significant modifications, disappointing the Plan's supporters and at risk to the Council's reputation in carrying out its duty to support.



6. EQUALITIES IMPACT

- 6.1 Not directly applicable to this decision. However, the Plan will need to meet the 'Basic Conditions' laid out in the Localism Act 2011 to proceed to referendum. This should ensure it recognises equalities practice in the English planning system.

7 CLIMATE CHANGE IMPLICATIONS

- 7.1. Not directly applicable to this decision. However, it is worth noting that the Plan does propose a Zero Carbon Buildings policy, and picks up appropriately in this theme elsewhere, recognising the need for development to mitigate its impact and adapt to the changing climate.

8. ALTERNATIVE OPTIONS

- 8.1. Not applicable

9. BACKGROUND PAPERS

- 9.1. None

STOW ON THE WOLD & THE SWELLS

Neighbourhood *Plan*

2023 – 2031



PRE-SUBMISSION VERSION

Published by Stow on the Wold Town Council and Swell Parish Council for Pre-Submission consultation under the Neighbourhood Planning (General) Regulations 2012 (as amended).

FEBRUARY 2023

A Guide to Reading this Plan

Of necessity, this Neighbourhood Plan is a detailed technical document. The purpose of this page is to explain the structure and help you find your way around the plan.

1. Introduction & Background

This section explains the background to this Neighbourhood Plan and how you can take part in and respond to the consultation.

2. The Neighbourhood Area

This section summarises the key facts and features of the designated Neighbourhood Area, that is Stow on the Wold and the Swells (the plan covers both the town and its neighbouring parish).

3. Planning Policy Context

This section identifies the key national planning policies and those of the local planning authority, Cotswold District Council that relate to this area and have guided the preparation of the plan.

4. Community Views on Planning Issues

This section explains the community involvement that has taken place so far.

5. Vision, Objectives & Land Use Policies

This section sets out a vision of the area in 2031 and the objectives of the plan. It then proposes the land use planning policies to achieve those objectives over the plan period, which are accompanied by some explanatory text. There are Policy Maps at the back of the document which show where area or site specific policies will apply.

6. Implementation

This section explains how the Plan will be implemented and future development guided and managed. It also proposes priorities for how the Community Infrastructure Levy (CIL) will be reinvested by the Town Council in support of the plan objectives. Finally, it proposes how any issues that are outside the scope of land use planning (and therefore this Neighbourhood Plan) may be taken forward by the Town Council.

STOW AND THE SWELLS NEIGHBOURHOOD PLAN 2023 - 2031

PRE-SUBMISSION VERSION

FEBRUARY 2023

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A PLAN BY THE COMMUNITY FOR THE COMMUNITY

I would like to start by expressing thanks to all those members of our community who have helped to create the exciting vision of the future which has led all our work on the Neighbourhood Plan (SSNP). By filling in questionnaires, attending meetings and offering views you have told us what we needed to know to complete this draft; your continued support and guidance is essential to achieve its final adoption.

The SSNP describes a vision, aspirations and plans for the future development and land use of the area covered by it, namely the town of Stow on the Wold and the parish of Swell. When finally approved our Neighbourhood Plan will be a statutory document that will be incorporated into the Cotswold District Council's planning framework and be used by them to determine planning applications. It is therefore of the greatest importance in protecting the AONB in which Stow and Swell sit from future uncontrolled development, as well as allocating land for development to meet the needs identified by the community over the next ten years.

The draft Neighbourhood Plan is based on the views of residents, local organisations, community groups and businesses of Stow on the Wold and Swell Parish, expressed through surveys and consultation events. Details of what the community has had to say on various issues is included throughout the Plan to illustrate how we have relied on your guidance.

The Plan has been drafted by the Neighbourhood Plan Steering Group (NPSG) of six residents and four councillors at any one time

NPSG Members

Stow on the Wold Councillors:

Councillor Alun White (Chair of NPSG), Councillor Jenny Scarsbrook (Chair of Stow on the Wold Town Council), Councillor Ben Eddolls, Councillor Peter Day, Councillor Sue Green, Councillor Mike Curtis, Councillor Maggie Deacon, Councillor Alex Clayton, Councillor Janet Piper

Swell Parish Councillor:

Councillor Diane Cresswell, Councillor Tim Blythe

Residents:

Mr Nicholas Carr, Mrs Ashleigh Cox, Mr David Cox, Mr Peter Dixon, Mr Stephen Gurmin, Mrs Bridget Ritacca, Mrs Merlyn Stracey, Mr Cathal Murphy

NPSG has been supported by other residents, who have been actively involved in developing specific policy areas and championing the Plan.

SSNP Champions

Susan Arthurs, Mary Beston, Alexander Clayton (now a councillor), Phillipa Davy, Ella Forster, David Germaney, Arun Hamilton, Colin Piper, Janet Piper, Millie Robinson, Paul Walker, David Wiblin, Sophie Winter (now a councillor) Clare Stubbs, Ed Shaw, Marc Buffery, Mike Clarke, Scheila Maliska, Sean Clarke, Steve Gurmin, Sue North-Bond, Stow Civic Society Committee.

As Chair of Stow on the Wold Town Council, I would like to thank the community for its feedback and members of NPSG and SSNP Champions for their commitment and hard work, together with Stow on the Wold Town Council Clerk/RFO Heather Siphthorp and her successor Claire Evans, Deputy Clerk, Liz Sajewicz and our Planning Consultant Neil Homer who have provided invaluable support and advice to NPSG.

This consultation draft is a step along the way to final adoption of our Neighbourhood Plan. The process of consultation and inspection is likely to take until early 2023. Comments and views will continue to be welcome during the various consultation opportunities leading up to final adoption of the Plan. An electronic copy of the draft SSNP and the evidence papers supporting it can be found online at www.stowonthewold-tc.gov.uk. Just click on the Neighbourhood Plan link.

Jenny Scarsbrook
Chair Stow on the Wold Town Council

LIST OF POLICIES

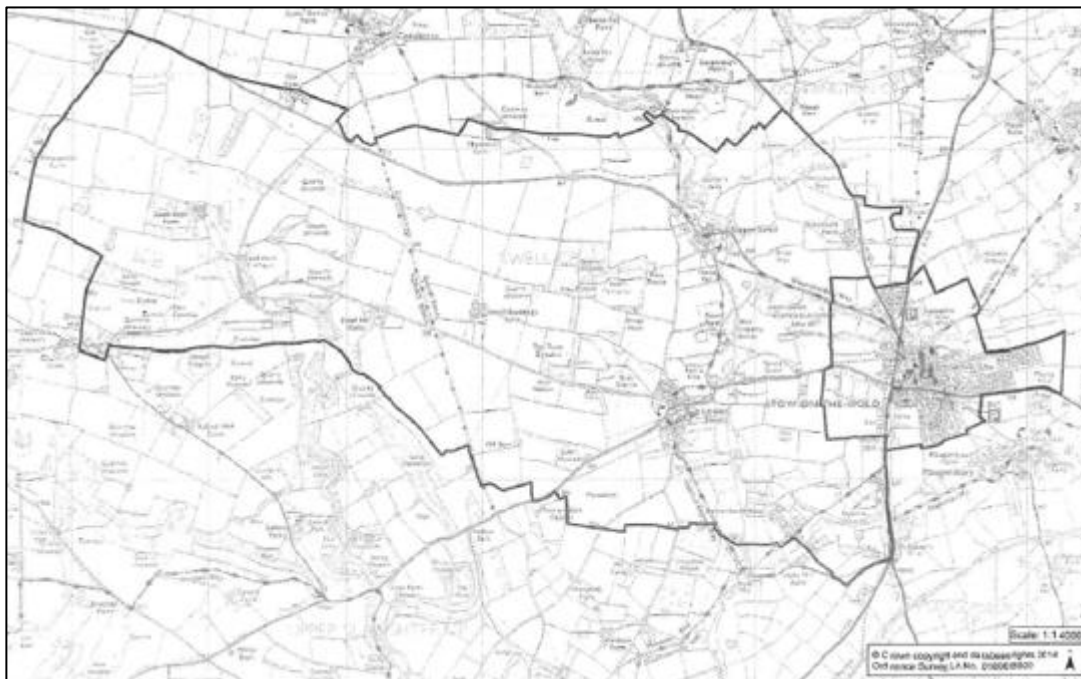
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1. INTRODUCTION & BACKGROUND

1.1 Stow on the Wold Town Council and Swells Parish Council are jointly preparing a Neighbourhood Plan for the area designated by the local planning authority, Cotswold District Council (CDC) in April 2015. The plan is being prepared in accordance with the Neighbourhood Planning (General) Regulations of 2012 (as amended) with the Town Council defined as the 'qualifying body' on behalf of the joint venture, as per the regulations.

1.2 The area coincides with the boundaries of the two councils (see Plan A below) with the town of Stow on the Wold on its eastern edge and the two villages of Lower and Upper Swell to its west, along with a large area of countryside further to their west towards the Guitings. To its north (along the ancient Fosse Way) is the town of Moreton in Marsh; to its east are the villages of Mangersbury and Broadwell; and to its south (also on the Fosse Way) the town of Bourton on the Water and the Slaughters. All of the designated area lies within the Cotswold Area of Outstanding Natural Beauty (AONB).

1.3 The purpose of the Neighbourhood Plan is to set out a series of planning policies that will be used to determine planning applications in the area in the period to 2040. The Plan will form part of the development plan for the area, alongside the adopted Cotswold District Local Plan and its successors in that period.



Plan A: Designated Stow on the Wold and Swells Neighbourhood Area

1.4 Neighbourhood Plans provide local communities with the chance to manage the quality of development of their areas. Once approved at a referendum, the Plan becomes a statutory part of the development plan for the area and will carry full weight in how planning applications are decided. Plans must therefore contain only land use planning policies that can be used for this purpose. This often means that there are important issues of interest to the local community that cannot be addressed in a Plan if they are not directly related to planning.

1.5 Although there is considerable scope for the local community to decide on its planning policies, Neighbourhood Plans must meet some 'basic conditions'. In essence, the conditions are:

- Is the Plan consistent with the national planning policy?
- Is the Plan consistent with local planning policy?
- Does the plan promote the principles of sustainable development?
- Has the process of making the plan met the requirements of European law?

1.6 In addition, the councils will need to demonstrate to an independent examiner that they have successfully engaged with their respective communities in preparing the Plan. If the examiner is satisfied that it has, and considers the Plan meets the above conditions, then the Plan will go to a referendum of the local electorate. If a simple majority of the turnout votes in favour of the Plan, then it becomes adopted as formal planning policy.

The Pre-Submission Plan

1.7 The Pre-Submission Plan is the opportunity for the councils to formally consult on the proposed vision, objectives and policies of the Plan. They have reviewed the relevant national and local planning policies and assessed how they affect this area. They have also gathered their own evidence and their reports are published separately in the evidence base.

The 2022 Levelling Up & Infrastructure Bill and 2021 Environment Act

1.8 During the preparation of this plan the Government published for consultation its proposed Levelling Up & Infrastructure Bill with some helpful changes to both the development plan and management system. It suggests that there is a positive future for neighbourhood planning in that system. The expectation is that the Bill will be enacted during 2023 and therefore likely after the examination of this Neighbourhood Plan.

1.9 The Environment Act 2021 has also come about during the preparation of the plan. It contains a number of proposals that may influence the final version of the plan, notably in respect of development proposals delivering biodiversity net gain and of addressing local nature recovery. The councils will keep a keen eye on the implementation of the Act in the coming months as these new policy initiative chime well with the expressed interests of the local communities.

Sustainability Appraisal & the Habitats Regulations

1.10 The District Council confirmed in its screening opinion of February 2019 that the Plan would require a strategic environmental assessment (SEA) as per the Environmental Assessment of Plans & Programmes Regulations 2004. The councils have proceeded to meet that obligation in the form of a broader sustainability appraisal (SA/SEA) to enable them to assess the social and economic effects of the plan, as well as its environmental effects. A draft environmental (SA/SEA) report has been published separately alongside the plan for consultation in accordance with the regulations.

1.11 That same screening opinion confirmed that the plan would not require an appropriate assessment (as per the Conservation of Habitats and Species Regulations 2017 (as amended)) as it is not considered to have the potential for significant adverse effects on any international habitat.

The Next Steps

1.12 Once the consultation exercise is complete, the councils will review the comments made and prepare a final version of the Plan. This will be submitted to CDC to arrange for its independent examination and then the referendum.

Consultation

1.13 If you have comments to make on this plan, please do so by **MONDAY 20 MARCH 2023** at the latest in the following ways:

Email (preferred):

stowplan@stowonthewold-tc.gov.uk

Post:

**Neighbourhood Plan Comments
The Town Clerk,
Stow on the Wold Town Council,
Stow Youth Centre,
Fosseway,
Stow on the Wold,
Gloucestershire GL54 1DW**

1.14 Further information on the Plan and its evidence base can be found on the project website at:

www.stowonthewold-tc.gov.uk

2. THE NEIGHBOURHOOD AREA

2.1 Stow on the Wold is an ancient Cotswold market town. It sits on a hill at about 800 feet above sea level. The town was founded as a planned marketplace to take advantage of its unique position at the convergence of eight trackways, now eight busy roads. The main source of wealth in the Cotswolds was wool and Stow grew to provide accommodation and other services for those visiting its fairs.

2.2 Buildings in Stow were built with the mellow Cotswold limestone from local quarries. Many of the houses were built in the 16th century, but those built later have blended in to become part of the character of this beautiful town. The historic core of the town is a Conservation Area with an extensive concentration of listed buildings. Stow and Swell lie within the Cotswold AONB. Stow is popular with visitors for its architecture and range of independent shops, cafes, restaurants, pubs and accommodation.

2.3 The number of Stow residents was 1,941 in 2019 (ONS est), a drop from 2,042 in 2011 (2011 census). 14% of the population comprises children under 15 compared with 18% in England, and this proportion is declining. 54% of the Stow population is aged 16-64 compared with 66% in England, and the percentage of the Stow population over 65 is 32%, compared with 16% in England.

2.4 Between 2011 and 2019 the proportion of Stow residents aged 18 and under dropped by 30%, the proportion of working age dropped by 6% and the proportion aged 65+ increased by 44%. (Data from 2011 Census and GCC Population Mid Year Estimates for 2019).

2.5 Swell Parish (pop 380) was formed in 1935 by the amalgamation of Upper and Lower Swell parishes. Both villages are located one mile west of [Stow-on-the-Wold](#). The River Dikler, which is prone to flooding, runs through Upper and Lower Swell to join the River Windrush. In doing so it passes old farmsteads and some of the loveliest countryside of the Cotswolds.

2.6 The attractiveness of the area has brought housing and parking pressures. Movement out of London and the south-east has made Stow and Swell particularly attractive for retirement, second homes and holiday lets. There have been two major retirement complexes built outside Stow's development boundary in recent years. There is continuing decline in private long term rentals, with consequential pressure on rents. There has been no significant development of socially rented accommodation since the mid twentieth century and much of the existing stock has been taken up by right to buy.

2.7 While exact figures cannot be verified, information provided by Cotswold District Council, and the number of Stow on the Wold properties available for rent through holiday rental websites, indicate that currently around 16% of Stow on the Wold housing stock is used as holiday rentals and/or second homes. It is apparent that, since Covid, the number of properties being turned into holiday lets continues to increase rapidly, in both Stow and Swell.

2.8 The area has high property values but low incomes. Failure to provide an appropriate mix of housing has led to more economically-active people, particularly the young, being forced to look elsewhere for somewhere to live. There is little unemployment in the North Cotswolds and local employers have difficulty in recruiting. This poses a significant risk to Stow's sustainability and raises its carbon footprint as many of those who work in Stow commute from the wider area. There is a strong case for the provision of affordable housing to address these issues. Given the high local house prices and private rental prices, this points to the need for a significant amount of social rented accommodation.

2.9 Stow has a tight development boundary with very little developable land. Any major development would have to be outside that boundary (as was the case with the two recent major retirement projects). Such development would need to be sensitive and address Stow's needs for new primary residences and socially rented accommodation available in perpetuity.

2.10 There is significant pressure on parking spaces in Stow due to commuters, visitors, and houses with no off-street parking. There is also a desire to make the historic town square and its immediate environs a more pedestrian friendly environment. To address these objectives, sufficient additional parking needs to be developed.

MAIN PLANNING ISSUES

- During the mid Twentieth Century a substantial number of social housing was built in two major development – King Georges Field and the Park estate. A substantial number of these properties have passed into private hands under the Right to Buy and have not been replaced. There is only limited turnover in the remaining social housing.
- Stow, a compact hilltop community within the AONB has a tight development boundary. Most developments in recent years have been minor infill developments within the development boundary. Stow's attractiveness has resulted in high prices well beyond the reach of almost all local residents. There has been an increase in the number of second homes. The private rented sector has seen a significant shift towards holiday lettings pricing local people out of that market also. This has forced many young people away from Stow leaving an increasingly ageing population.
- Stow's working age population has fallen over the last decade and the Primary School rolls have declined with an increasing number of pupils coming from outside the parish. Only two significant developments have been permitted outside the development boundary both of which have been restricted to retirement living. Taken together the McCarthy and Stone development north of Tesco and the Brio development on Stow Hill (for which approval was given on appeal) will add some 200 frail elderly residents to Stow's population (currently about 2000).
- There is a strong case for seeking to improve Stow's sustainability by providing a significant number of houses that local people and essential workers can afford. This can only be achieved by substantial development of affordable housing, primarily social rented, outside the current development boundary.

3. PLANNING POLICY CONTEXT

3.1 The Neighbourhood Area lies within the Cotswold District Council area in the county of Gloucestershire.

National Planning Policy

3.2 The most recent version of the National Planning Policy Framework (NPPF) published by the government in 2021 is an important guide in the preparation of neighbourhood plans. The following paragraphs of the NPPF are considered especially relevant to this neighbourhood plan:

- Sustainable development (§8)
- Non-strategic policy making (§18)
- Neighbourhood plan making (§28-§29)
- Supply of homes (§60-§64 and §67)
- Planning larger scale housing development (§73)
- Ensuring the vitality of town centres (§86)
- Promoting healthy and safe communities (§92)
- Local green spaces (§102)
- Promoting sustainable transport (§106)
- Supporting high quality communications (§115)
- Achieving well-designed places (§127 and §129)
- Conserving and enhancing AONBs (§176 and §177)
- Conserving and enhancing the historic environment (§190)

3.3 The combination of these policy objectives has been in effect in the neighbourhood area not only since the advent of the NPPF in 2012 but for decades prior, with their emphasis on environmental constraint in this type of area. In most regards, the area has greatly benefited from this continuity in policy but its downside has become more obvious to the community in the past few years. The introduction of neighbourhood planning in 2011 has allowed communities to consider striking a different balance between these objectives.

3.4 More recently, the Government published its first National Model Design Guide in autumn 2019 to encourage better design outcomes from the planning system. The Guide encourages local communities to engage in understanding the character of their areas and, where preparing neighbourhood plans, to prepare design policies specific to their local areas. Here, the Cotswold Design Code pre-empted this initiative in 2018.

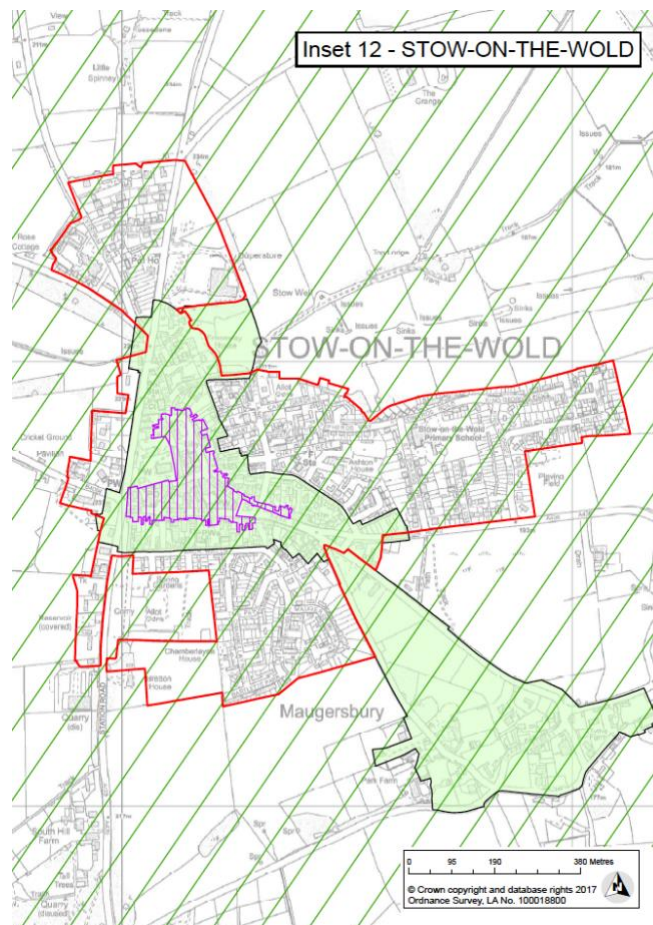
Strategic Planning Policy

3.5 The Neighbourhood Plan must be in general conformity with the strategic policies of the development plan, which primarily comprises the Cotswold District Local Plan 2011 - 2031 adopted in August 2018. Its key policies of relevance to this Neighbourhood Area are:

- DS1 Development Strategy
- DS2 Development within Development Boundaries
- DS3 Small Scale Residential Development in Non-Principal Settlements
- SA2 Mid Cotswold Principal Settlements
- S13 Stow on the Wold
- H1 Housing Mix and Tenure

- H2 Affordable Housing
- H3 Rural Exception Sites
- H4 Specialist Accommodation for Older People
- EC3 Employment Generating Uses
- EC7 Retail
- EC10 Tourist Facilities and Visitor Attractions
- EN1 Built Natural and Historic Environment
- EN2 Design
- EN4 Historic and Natural Landscape
- EN5 Cotswolds AONB
- EN10-EN12 Heritage Assets
- INF1 Infrastructure Delivery
- INF2 Social and Community Infrastructure
- INF10 Low Carbon Energy Development

3.6 As with the direction of national policy shaping the Local Plan, the dominant theme for this part of the District with these combined policies has been to see the town, villages and countryside remain much as they are and have been for many years. Its Policy S13 is specific to the town and encourages improvements to community and tourism facilities but contains no development proposals. Its notes that, “tourism is crucial to the long-term economic prosperity of Stow, and the high quality of the town’s environment has been a key factor in the town’s economic success. The town is an important contributor to the District’s economy, with a good range of shops and services” (§7.15.2).



Plan B: Local Plan Policies Map – Stow on the Wold Inset

3.7 It notes too that, “enhancing the town centre further (e.g. by reinstating the Market Square as the focal point of the town) is an important economic priority. Addressing car parking and congestion problems in the town would help to achieve this” (§7.15.3). It goes further in advising that, “options should be explored for improving the physical environment of the town centre, including moving car parking provision from the Market Square to a suitable location within easy reach of the town centre. A suitable site could also be identified for additional off-street car parking provision to alleviate the impact of tourism and maintain the contribution that visitors make to the town’s economy” (§7.15.4) but stops short of making specific proposals.

3.8 The District Council is currently carrying out a Partial Update of the adopted Local Plan to cover the same plan period to 2031. This exercise has reached the ‘Issues & Options’ stage (under Regulation 18) with the intention of submitting the plan for examination in 2023. It is possible that the process may generate helpful evidence in the coming months to inform the Neighbourhood Plan, but this Plan will be submitted and examined in relation to the adopted Local Plan. To date, it has advised the Town Council that it has no plans to seek housing growth at Stow to meet District needs (as per NPPF §67).

3.9 However, the Issues & Options consultation document highlighted a number of ways in which the District Council is considering how its area may better respond to the challenges of climate change and of wider sustainable development issues. The Town and Parish councils have been very mindful of those issues from the start of the project in 2018 – indeed, they have been at the very forefront of their thinking, driving the vision, objectives and policies.

3.10 There are other waste and minerals development plans for Gloucestershire that apply in the Parish, but they are not considered relevant in the preparation of this Neighbourhood Plan. There are no made neighbourhood plans in the vicinity, but others in the District have been made or are in the process of being prepared.

Cotswolds AONB Management Plan

3.11 The latest iteration of the statutory Management Plan covers the period 2018 – 2023. It sets out the vision, outcomes and policies for the management of the AONB to conserve and enhance its natural beauty and to increase the understanding and enjoyment of its special qualities. It considers the key issues for the AONB to be the erosion of that beauty and those qualities combined with an inconsistent approach to management across the AONB and a lack of understanding of its benefits.

3.12 The scope of the Management Plan extends well beyond that of the land use and development planning system but inevitably the majority of its policies are closely related to how the development plan – the Local Plan and this Neighbourhood Plan – should seek to manage development proposals in this area to 2031. Of these policies, those that are considered the most relevant to shaping the Neighbourhood Plan (and which refine more general Local Plan development management policies) are:

- CE1 Landscape – requiring attention is paid to the CCB’s Landscape Character Assessment and Landscape Strategy & Guidelines
- CE3 Local Distinctiveness – requiring proposals to be designed and landscaped to respect local settlement patterns, building styles, scale and materials
- CE4 Tranquility – seeking to avoid and minimise noise pollution and visual disturbance
- CE11 Major Development – requiring proposals to be ‘landscape-led’

- CE12 Development Priorities – wanting priority to be given to the provision of affordable housing, maintaining and enhancing local community amenities and services, and improving access to these amenities and services



Plan C: Map of the Cotswolds AONB area

4. COMMUNITY VIEWS ON PLANNING ISSUES

4.1 Stow on the Wold Town Council, Swell Parish Council and the Neighbourhood Plan steering group have consulted with the local community during the course of the Plan preparation process, and the Neighbourhood Plan is based on the result of these consultations, which have included meetings, community barbecue, open days, newsletters and community surveys. Particular emphasis was placed on early community consultation to engage as wide a range of local people and interested parties as possible at the start, before any proposals were formulated. This raised the awareness of residents and businesses and ensured that their views and priorities could influence the plan from the outset.

4.2 Then during 2011, 2012 and the first half of 2013 a Neighbourhood Plan for Stow on the Wold was consulted upon and a draft was very close to publication, when, at the suggestion of Cotswold District Council, in August 2013 the plan was put on hold pending the outcome of a number of planning applications in the town. If all of the applications were to be approved the character of the town would be entirely changed and the Neighbourhood Plan rendered obsolete prior to its publication.

4.3 A public meeting was held in March 2014 to inform the community of the pressing need to produce a new Neighbourhood Plan and establish a vision of what the community wanted for the future of Stow and the Swells.

4.4 After the meeting a steering group was formed. The group designed a comprehensive questionnaire for residents which was delivered to all households and businesses during August and September 2014 asking the community's views on a number of issues including planning, housing, sports facilities, traffic and on street car parking, education, health and wellbeing etc. In September 2014 a community barbecue with entertainment was held in the town square, free to residents in return for completion of the questionnaire. In November 2014 a public meeting was held at Stow Primary School seeking the views of parents, teachers and the children as to how Stow should look in the future and more questionnaires were distributed. Residents were able to respond about individual issues or all issues. The number of responses received was: Environment - 115, Health, welfare and community - 136, Traffic, parking and transport - 209, Planning and housing - 140, Education - 214, and general comments - 17.

4.5 The steering group analysed responses and in April 2015 community road shows were held at three locations in Stow and one in Swell parish to update residents with results from the questionnaire. The findings of the questionnaire and other surveys identified several development proposals and infrastructure projects within the town of Stow and the villages of Swell to improve their facilities. The steering group put together a list of proposals and preferred sites to address these improvements and during 2015 those land owners whose property could possibly be involved were approached and their permission sought to include the various pieces of land in the Neighbourhood Plan.

4.6 The following typifies feedback from within the community to a number of questionnaires and housing surveys: we must address 'the lack of affordable housing', we need to 'ensure that any new affordable housing is made available in perpetuity and then only to people who can demonstrate a local connection', 'any development should conserve and enhance the character of the parishes in a way that meets townscape and AONB guidelines'. In response to these demands during 2015 and early 2016 discussions took place with interested parties within Stow and the Swells regarding the publication of a Design Statement or Code to regulate future developments and alterations and additions to existing properties within the Neighbourhood Plan area.

4.7 The views and opinions of many residents were sought as to the content of the Design Statement. Those consulted included local architects, members of the planning committees from both of the parishes, representatives of Stow and District Civic Society, local builders and residents of Stow and the Swells. The final Draft of the Community Design Statement was published in May 2016.

4.8 In parallel with the creation of a Design Statement, during 2015 and early 2016, at the instigation of Stow Town Council and the Neighbourhood Plan Steering Group and subsequent to a number of public meetings, a committee of volunteers was formed to set up a Community Land Trust with a view to facilitating the development of truly affordable housing and other developments within the Parishes to meet the identified needs of the community.

4.9 During The Stow Cotswold Festival, in July 2015, the Neighbourhood Plan Steering Group manned a stall in the Market Square informing the community and visitors to the festival of the progress of the Neighbourhood Plan and what lay ahead before the plan could be approved and adopted. In October and November 2015 at the behest of the Neighbourhood Plan Steering Group GRCC carried out a further Housing Needs Survey in Stow. A questionnaire was delivered to every household in Stow and the results of the survey are available on the project website.

4.10 A survey was conducted with a questionnaire delivered to every household in October 2015 seeking the residents' views on "Play and Sports Facilities in Stow". The results are available [here](#). Two further roadshows to discuss the results of the Housing Needs Survey and to announce the formation of the Community Land Trust were held in Feb 2016. Also in February a survey of every business within 250m of Stow Market Square was conducted to evaluate the daily on-street parking requirements for the managers and staff of all the businesses. In February and March 2016 a further survey was carried out to determine the on-street parking requirements of households within 250m of the square. The results of each of these surveys are also available on the website. At the same time a survey of the residents of The Swells was conducted via "The Swell Voice" to establish the support for a children's play area in the community. Support was so sporadic that the proposal has been temporarily shelved.

4.11 During 2017 a number of drafts of the Neighbourhood Plan were issued by the Steering Group with the final draft, version number 12, being adopted together with the Community Design Statement by both Stow Town Council and The Swells Parish Council on 28th September 2017.

4.12 In 2019 a group of Neighbourhood Plan champions from across the community was established, whose members were briefed on the Neighbourhood Plan so they could support the steering group and help family, friends and neighbours to understand the issues. In March 2020 community consultations were held by means of a postal survey created by Gloucestershire Rural Community Council to identify residents' concerns and what they supported in the Neighbourhood Plan. 325 households returned the postal questionnaire, a response rate of 31.4%, or 37%, if the total number of households is discounted for second homes and holiday lets. In March 2020 public drop-in days were held to consult the community about possible development sites. 170 forms were completed.

4.13 During the summer of 2020 the Steering Group followed this up with detailed surveys and face to face interviews with residents and visitors to ensure the views of more young people and businesses were gathered about sport, leisure, community facilities, green spaces, access and parking.

4.14 In May 2022 a letter was sent to all households in Stow and Swell parishes to update the community on what they had asked for and what progress had been made. This was followed by public drop-in events to seek the community's views on potential development proposals which were presented at public drop-in sessions in Stow. Responses received 214.

MAIN ISSUES AND CONCERNS RAISED AS A RESULT OF CONSULTATIONS

- Concern that the unique townscape and environment of the town, parish and AONB should be conserved and enhanced and not spoilt by inappropriate development.
- The need for truly affordable housing for local people.
- Concern regarding the development of too many assisted living/care units.
- The need to maintain and develop the town's economy.
- The desire for a new leisure/community centre including a youth club.
- An identified need for additional sports and leisure facilities for young e.g. adventure playground, skate/BMX Park, etc.
- A desire for a town museum.
- The critical need for more parking close to the town centre, better access to public transport and a reduction in the impact of through traffic especially HGVs.
- A desire to reconfigure the market square re-establishing it as the focal point of the town and make visiting it a more enjoyable experience for residents and tourists alike.
- A desire to achieve a balance between social, environmental and economic sustainability.
- Support for the development needed to address current threats to sustainability.
- A desire to achieve a sustainable social and economic future for Stow and the Swells.

5. VISION, OBJECTIVES & LAND USE POLICIES

Vision

5.1 The vision of the neighbourhood area in 2031 is:

The unique townscape and environment of Stow and Swell parishes and the AONB have been conserved and enhanced. The community now has a better supply of market and affordable housing of a variety of types to meet its needs, which has led to a higher proportion of young people living in the town. Preventing new homes being used for second homes has also made a difference.

The town's economy has diversified with new small businesses and home workers, although its tourism appeal remains vital. The Market Square is now less dominated by parking with its public realm being significantly improved. Its public car parks are well used and have encouraged visits to walk to the Market Square. The town has also benefited from its new community hub building, which has complemented its longstanding community facilities.

The Swells have retained their special rural Cotwolds character. Little has changed but Lower Swell has benefited from improved car parking arrangements for local residents.

Objectives

5.2 The key objectives of the Neighbourhood Plan are:

- To ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced.
- To ensure that the community has an adequate supply of affordable housing to meet its needs.
- To secure and develop the town's economy.
- To ensure that the community has appropriate infrastructure in terms of health services, community facilities, traffic and parking, public transport, and its green infrastructure.

Land Use Policies

5.3 The following policies relate to the development and use of land in the designated Neighbourhood Area. They focus on specific planning matters that are of greatest interest to the local community, especially in seeking to make a step change from the past to deliver a more sustainable future for the town, villages and countryside.

5.4 Special care has been taken by the councils to avoid any unnecessary repetition of policies between this plan and the Local Plan. However, for completeness there is some overlap so that this plan can be read without having to continuously cross reference.

5.5 Each policy is numbered and titled and it is shown in bold, coloured text. Where necessary, the area to which it will apply is shown on the Policies Map attached to the document. After each policy is some supporting text that explains the purpose of the policy, how it will be applied and, where helpful, how it relates to other development plan policies.

Policy STOW1: The Stow on the Wold Development Boundary

The Neighbourhood Plan defines the Stow on the Wold Development Boundary, as shown on the Policies Map. Within the Development Boundary applications for development will be permissible in principle.

5.6 This policy restates the principle in policies DS2 and DS4 of the adopted Local Plan for how proposals located within the Development Boundary of Stow on the Wold – a ‘Principal Settlement’ – will be managed, a distinct from proposals outside that boundary, which are addressed by Policy STOW2. The Boundary shown on the Policies Map has been modified to reflect the completion of the surgery development on Mangersbury Road but will not be redrawn to accommodate the site allocation proposed in Policy STOW7 until a scheme is approved and built out.

5.7 Proposals are only considered appropriate in principle. They must also accord with all the other policies of this Plan and of the adopted Local Plan as relevant to their location, nature and scale. The Stow & Swells Design Code of Policy STOW8 will be especially important in managing how well proposals fit with the very special character of the town.

Policy STOW2: Development in The Swells and the Countryside

A. The Neighbourhood Plan defines Lower Swell as a small village with very limited local services that is suited only to small scale residential development and where its existing community facilities and local green spaces will be protected and its off-street parking capacity improved.

B. The Neighbourhood Plan defines Upper Swell as a hamlet with no local services that is not suited to small scale residential or any other form of urban development.

C In the Rural Area beyond the settlements of Lower Swell and Upper Swell proposals to improve the agricultural economy, equestrian facilities and local nature improvement will be supported. Proposals for an isolated homes in the Rural Area argued on the basis that they are of exceptional quality alone will not be supported

5.8 This policy sets out the principles for development in Lower and Upper Swell and the rest of the countryside of the neighbourhood area. It is consistent with the policies of the adopted Local Plan, notably its Policy DS3 in managing small scale development in the villages (as ‘non-principal settlements’) that do not have defined Development Boundaries and its policies DS4, EN4 and EN5 in managing development outside settlements in the wider natural and historic landscape of the area, which all lies within the Cotswolds Area of Outstanding Natural Beauty.

5.9 However, it acknowledges that whilst Lower Swell is of a scale that may accommodate some small scale development, Upper Swell is a hamlet that is so small that proposals could not practically meet all of the criteria of Policy DS3. Furthermore, although the NPPF (§80) makes provision for isolated homes in the countryside, this policy rules out those proposed only under its clause (e) as being of exceptional quality, as it is considered there is no location in the countryside of the area where its immediate setting would be enhanced rather than harmed by such a proposal.

Policy STOW3: Housing Mix

A. Within the Stow on the Wold Development Boundary proposals for residential development schemes of 6 or more dwellings will be required to deliver at least 40% of the dwellings as affordable homes within the scheme and comprising the following mix (as defined by national policy):

- 45% social rented
- 41% affordable home ownership (comprising 30% First Homes made available at a minimum 50% discount and 11% of other products)
- 14% affordable rent

B. Within the Stow on the Wold Development Boundary proposals for residential development schemes of 6 or more dwellings will be required to deliver the following mix of dwelling types:

- 17% 2 bed
- 33% 3 bed
- 34% 4 bed
- 16% 5 bed

5.10 This policy serves two purposes for the town: firstly it sets out the requirement for delivering affordable homes as a refinement of Policy H2 of the adopted Local Plan and in line with the evolution of national policy since 2018 (notably the launching of the 'First Homes' affordable housing for sale product). Secondly, it sets out the baseline proportions of housing types (by size) to meet local needs as a refinement of Policy H1 of the adopted Local Plan. At Lower Swell proposals will be determined in accordance with the adopted Local Plan policies H2 and H3 on affordable housing and rural exception sites.

5.11 The policy has been evidenced by the Housing Needs Assessment prepared for the neighbourhood plan by special consultants, AECOM, in March 2022. This report is published separately in the evidence base.

5.12 The report notes that the town has an above average number of affordable homes in its current stock but that this still falls far short of meeting needs in a place like Stow. The community wishes to use the opportunity presented by this plan to redress the balance of its stock and this policy will apply to the allocation in Policy STOW7 and to all other qualifying proposals over the plan period, unless a future review and assessment of need indicates otherwise. The report concludes that an emphasis on delivering a strong mix of social rented properties and First Homes will tackle the problem at a scale not seen in the town for generations.

5.13 In respect of housing types, the report has assessed the nature of the existing stock and the goals of the plan to encourage and enable young people and families to live in Stow to turn around its increasingly aging population profile. In that sense, the policy is intended to work in parallel with policies STOW4, STOW5 and the allocation of STOW7 as a combined and sustained effort to bring about a more sustainable community.

Policy STOW4: Principal Residence

Proposals for new open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.

5.14 This policy follows those of other local and neighbourhood plans in England where the growth of second homes has begun to have a serious adverse effect on access to market and affordable homes and its consequences for local services. Although it has been observed that in larger towns to which this type of policy applies there have been an effect on the operation of the local housing market, it is not considered such effects will be of a scale in a smaller, more contained town like Stow.

5.15 Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them.

5.16 Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition, and be obliged to provide this proof if/when the District Council requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc). Although this presents enforcement challenges to the District Council, it has noted that other planning authorities have not had to devote considerable resources to its implementation and supports the initiative.

5.17 The Housing Needs Assessment cited 2011 Census data showing 17% of the housing stock was second homes. New data is imminent but will only show that this proportion will have significantly increased over the last ten years, in line with, or perhaps at an even greater rate, national rates in desirable rural areas like Stow and the Swells. With the allocation proposal of STOW7 creating a generational opportunity to change the town's housing stock, and alongside the provisions of STOW4 and STOW5, its housing supply cannot be undermined by second home ownership.

Policy STOW5: Specialist Accommodation for Older People in Stow

Proposals for specialist accommodation for older people falling within classes C2 or C3 of the Use Class Order, including sheltered and extra-care housing, care homes and other appropriate models of accommodation for the elderly and those with particular needs, will not be permitted unless:

- **they are of a small scale and are delivered as genuine affordable housing for households with a local connection; and**
- **they deliver no more than 40 such units in the plan period.**

5.18 The policy is intended to slow down the supply of age-restricted homes in Stow for the plan period by confining such schemes to those of a small scale linked with the plan's affordable housing objectives and by placing a cap on their total number. Although such an approach is discouraged in national policy it is not disallowed.

5.19 The town has seen two major such developments in the last decade – the only housing developments in the town of any scale since the 1980s – which will serve to exacerbate its already unsustainable, aging population profile. Neither Lower or Upper Swell are considered suitable locations for this type of use in any event, given their remoteness and lack of local services.

5.20 The change in the town's age demographic between only 2011 and 2019 is stark. The Census data and mid-year estimate for 2019 show that the 65+ age group increased by 44% and the working age group and under 18s fell by 6% and 30% respectively. The policy is therefore needed in these special circumstances to sit alongside policies STOW3 and STOW4 as a package of measures seeking to bring greater, plan-led management of future housing supply. Its effect will be monitored and reported on in the next main review of the plan.

5.21 In doing so, it refines Local Plan Policy H4 on this same matter that allows for such proposals where there is a proven need and where they are well located and will provide affordable and other accommodation needs. This 'predict and provide' approach is a self-fulfilling prophesy, as shown in the Housing Needs Assessment report, and will only serve to make the town more attractive to wealthier, older households moving into the area from far afield. Though their spending power may be helpful to some local services, such schemes have a significant opportunity cost in using vital brownfield or greenfield land that could otherwise be used for a wider range of home types, which would broaden the town's economic case and patronage of local services.

5.22 However, the town has benefited from almshouse-type schemes in its past as a means of providing genuinely low cost housing for local people. The policy therefore provides an exception for small schemes – defined as 5 homes or fewer – for elderly person households relocating from within the Town or Parish or from a Parish that immediately adjoins the Neighbourhood Area.

Policy STOW6: Health and Well Being

Proposals for housing development of any type should demonstrate how they will support the community's physical and mental health and social networks. Proposals will be supported that:

- **encourage active lifestyles and healthy choices**
- **provide access to open spaces and links to footpaths and cycling routes and provide for cycle storage**
- **are designed to improve air quality, reduce noise pollution, reduce car use and calm traffic**
- **contribute towards the provision of new community infrastructure defined in Section 6 of this Plan**
- **for major housing development schemes, include publicly shared outside green, play and allotment space and sympathetic landscaping including appropriate native trees which screen the development from distant views**
- **incorporate 'Healthy Home' features, as described in the UK Green Building Council's *Health and Wellbeing in Homes* (July 2016) document, and reflect the varied design of buildings in historic Stow**
- **do not differentiate between different types of housing tenure in respect of their design**

5.23 The purpose of this policy is to ensure that any new housing development is focused on the people who will live there, the impact of the development on the environment and the future impact of climate change.

5.24 The challenges of COVID have highlighted how important it is to build sustainable communities through the design of the built environment. This area managed those challenges relatively well with its mix of local services and facilities. But it is vital that its assets are maintained well into the future to handle not just the potential for similar events, but also as a means of tackling climate change and of encouraging healthier lifestyles.

Policy STOW7: Land North East of Stow

A. The Neighbourhood Plan allocates 4.5 Ha of land to the north east of the town, as shown on the Policies Map, for a low or zero carbon residential-led, mixed use development comprising:

- **A housing scheme of approx. 170 homes comprising approx. 100 open market homes and approx. 70 affordable homes;**
- **A public car park scheme of approx. 150 spaces; and**
- **A community hub building for a mix of local community facility uses (falling within either Classes E(d) or F2(b) only) and managed workspace uses (falling within Class E(g)(i) only)**

B. The housing scheme shall comprise a mix of dwelling types as required by Policy STOW3 and an affordable housing mix of 70% social rent, 25% First Homes and 5% affordable rent, and shall be located in a way that relates well to the public car park and community hub schemes to aid their natural surveillance.

D. The public car park scheme shall be located as close to the Broadwell Lane junction as possible. It shall comprise a single car park laid out and landscaped in such a way as to minimise its urban appearance in the wider landscape. It shall be lighted using discreet columns that combine motion-sensitive lighting and CCTV to achieve a safe space that does not emit unnecessary light pollution. It shall comprise a permeable surface only. It shall be designed in such a way that every space can accommodate an electric charging point, with a minimum of 10% of the spaces having installed points at the outset. It shall be constructed and made available for operation prior to the first occupation of the housing scheme.

E. The community hub scheme shall comprise either a single, multi-purpose building or ground floor accommodation as part of the housing scheme and shall be of a detailed specification to be agreed with the Town Council. The building form and design should be distinct from the main housing scheme but should accord with the relevant requirements of the Cotswold and Stow Design Codes. It shall be located adjoining the public car park to be able to share some of its spaces. It shall be constructed and made available for operation prior to the full occupation of the housing scheme. Its hours of operation will be restricted to protect the amenities of nearby residential properties.

F. The design strategy shall comprise a layout, plots, building forms and designs and a landscape design that are informed by a clear understanding of the relevant guidance published by the Cotswold AONB and with the relevant requirements of the Cotswold and Stow Design Codes. Its character and appearance should be inspired by the Parks Estate in the town. It shall provide for a layout and landscaping scheme that successfully mitigate the effects of the development on the AONB countryside to the east and shall acknowledge the views across the site south eastwards from Broadwell Lane.

G. The active travel strategy shall comprise a layout that creates new pedestrian routes to connect with Well Lane, with the superstore development to its immediate west and with the pavement on the eastern side of the A429 Fosse Way at its junction with Broadwell Lane. These routes shall be well signposted to the town centre from within the housing scheme and from the public car park scheme.

H. The transport strategy shall seek to discourage traffic generated by the housing, public car park and community hub schemes from using Broadwell Lane other than to access the site from the A429 Fosse Way. It shall also implement any improvement works shown to be necessary to the A429 Fosse Way/Broadwell Lane junction prior to the occupation of the first dwelling.

I. The green infrastructure strategy shall make provision for onsite biodiversity net gain of at least 20% (as measured by the most up to date BNG Metric) as part of its proposals to integrate with the wider network of green infrastructure. It shall avoid any loss of the existing mature tree and hedgerows within the site boundaries and shall seek to reinstate historic hedgerows as part of the landscape scheme. The landscape scheme shall also seek to replace existing non-native tree species on the site boundaries with native species.

J. Proposals should be made in the form of a comprehensive planning application and should include:

- 1. an illustrative masterplan that defines the land uses and key development principles for access, layout, design and the principles of phasing and implementation;**
- 2. design features that improve energy efficiency and reduces carbon dioxide emissions; and**
- 3. a planning obligation to secure the release of the public car park and community hub schemes once completed and any other supporting infrastructure prior to the commencement of that scheme.**

5.25 This policy allocates land on the north-eastern edge of Stow to accommodate a sustainable extension to the town comprising valuable affordable housing, additional public car parking and a new building to support community and business uses. It is an essential component of delivering the vision for the future success of the town as a package of measures with policies STOW3 and STOW4 and an illustrative masterplan is shown below.

5.26 The land is in the control of a single developer and can be delivered in full within the next five year plan period. It is well located in respect of the town centre (less than 400m walking distance) and of the main superstore (less than 100m). The same developer also controls a smaller area of land that lies within the same defensible boundaries of the allocation site but lies outside the Neighbourhood Area (in adjoining Broadwell Parish). The developer has brought forward the outline proposals to date on the basis that a planning application would be made for all of the land should the Neighbourhood Plan be made with this allocation policy. The Town Council has therefore engaged with the community and other stakeholders – including Broadwell Parish Council – using that larger proposal for transparency, even though the Plan itself can only allocate land and contain policy relating to the larger part of the site within its area. In doing so, the developer has confirmed that there is no viability dependency of the larger site on the smaller site.

5.27 A small part of the site – its south-western corner – lies within the Conservation Area and all of the site forms part of the wider, gently sloping hillside sweeping to the east and south and so is visible in the generally setting of the town from the east. The land is reasonably well enclosed from public vantage points on its north, west and southern boundaries but is exposed to the east and the wider AONB countryside. In this regard, the allocation proposal is considered to comprise a ‘major

development’ in the AONB, the justification for which must show that its public benefits outweigh the harm to the AONB (as per NPPF §177 and set out in Appendix E).

5.28 It is therefore vital that the masterplan demonstrates how the layout and design of each of the component schemes will use the shape, natural features and topography of the land to conserve the special landscape and scenic beauty of the AONB. In any event, the design of the overall layout and the distinct schemes will be expected to follow the distinctive design principles of this part of the Cotswolds – as set out in a number of Cotswolds AONB Conservation Board published guidance documents and by a combination of the Cotswold and Stow Design Codes – to ensure that it stitches into the fabric of the town visually as well as functionally. The vernacular aesthetic and general form of the Parks Estate on the south side of the town is considered as the most appropriate inspiration for the scheme.

5.29 The evidence base and site assessment note (also part of Appendix E) explain the rationale for selecting this land for allocation. The land presents a generational opportunity to address matters of increasing concern to the local community. The town is an internationally renowned, historic tourist attraction of few equals in the UK. But its success has created housing and parking problems that, if left unaddressed, have the potential to undermine that success in future years.

5.30 Although the current Local Plan requires no new housing supply from the town for the plan period, this proposal will make an important contribution to enabling the ever-aging demographic character to be arrested with a scale of new, genuine affordable housing not seen in the town for many years. The policy proposes a tenure mix that differs from the mix proposed in Policy STOW3 in order to deliver on the community’s desire to see a significant uplift in the number of socially rented homes built in the town on this the largest scheme.

5.31 The town has also lacked a community centre of a size commensurate with its population. In addition, in the light of the effects of the Covid 19 pandemic, the community is keen to reduce the town’s dependency on tourism for its commercial success. The land is well-located, and is of a sufficient size, to incorporate a new multi-functional building that can meet each of these objectives (or provided in ground floorspace as part of a larger building with the dwellings above). An initial specification (in Appendix C) has been agreed by the Town Council based on its analysis of community and business needs, comprising a mix of office/managed workspace accommodation (now Class E(g)(i)) and of a hall/meeting place also suited to indoor sport, recreation and fitness uses (now Class E(d) and F2(b)). The Town Council will seek to liaise and agree these matters with the developer as a priority on the making of the Plan and a condition will be attached to the planning permission restricting the uses to avoid any future change within those respective use classes.

5.32 The provision of a new public car park is another essential public benefit justifying the allocation of the land. The facility will be less than a 10 minute walk to the town centre and will enable the relocation of spaces out of the Market Square (see Policy STOW8) to allow for public realm improvements, as well as to increase capacity for those that work in the town as well as visitors. Although utilisation data is dated, it indicated that parking capacity in the town was negligible at most times – new research has been commissioned but it is not considered that it will conclude anything other than capacity being an even greater problem. Once completed, the Town Council will endeavour to work with the District and County Councils in agreeing a parking strategy across the whole town to ensure the new capacity is operated as efficiently as possible.

5.33 The green infrastructure strategy, aligned with a landscape design that follows the AONB guidance, should enable significant improvements to biodiversity and local nature recovery, which are also important AONB conservation objectives. There is sufficient non-developable land within the site to accommodate these requirements.

Policy STOW8: Stow Town Centre & Market Square

A. The Neighbourhood Plan identifies the Stow on the Wold Town Centre on the Policies Map. The Market Square is defined as the primary shopping area within the Town Centre and is also shown on the Policies Map. On ground floors within the Market Square development proposals for Commercial, Business and Service uses will be supported. On ground floors outside the Market Square, development proposals for Commercial, Business and Service uses and Pub or Drinking Establishment and Hot Food Take-away uses will be supported.

B. Development proposals for new or intensified Commercial, Business and Service uses and Pub or Drinking Establishment and Hot Food Take-away uses should be carefully designed and mitigated to ensure that the amenity of existing residential uses is not negatively impacted upon and that the potential for statutory nuisance is avoided.

C. Proposals in the Market Square to change the use of an active ground floor frontage to a residential use will not be supported.

D. Proposals for new residential uses on upper floors will be supported, provided they:

- 1. are carefully designed to achieve a good quality of life for residents;**
- 2. achieve well-designed development that creates a safe and comfortable living standard, and which positively addresses the townscape through good design that enhances the external appearance of buildings;**
- 3. take account of existing ground floor uses and mitigate accordingly to minimise the scope for conflict with existing commercial operations and ensure that future residents have a good quality of life in amenity terms and that existing commercial operations are not unduly constrained;**
- 4. so far as possible, avoid residential access via rear service yards in order to enhance natural surveillance and assist legibility. Where this is unavoidable, measures to enhance legibility such as lighting should be incorporated into design, and clear distinction should be made to delineate between residential access routes and areas required for commercial activity; and**
- 5. minimise street clutter by directing supporting infrastructure such as bin stores and cycle facilities away from active frontages.**

E. Development proposals that require some loss of ground floor floorspace to facilitate access to upper floor residential will be supported where this can be achieved without undermining the integrity and viability of the existing unit(s); and provided it will not result in a proliferation of residential accesses that would undermine the vitality and viability of an individual shopping frontage.

F. All development proposals in the Town Centre must accord with the Design Code in respect of sustaining and enhancing the special architectural and historic character of the Conservation Area and of responding to the presence of statutory listed buildings and buildings of local importance.

G. Proposals that lead to a reduction in the overall space in the Market Square dedicated to vehicle parking will be supported, provided that space is repurposed for public realm improvements only and that the number of spaces lost will not undermine the commercial viability of the Market Square.

5.34 This policy is intended as an expression of how the community wishes to see the town centre thrive in a 'post-Covid' world. It seeks to sustain and build on the success of the town centre as a vibrant and vital heart of the town and the wider rural area and as a renowned visitor destination. The combination of its historic form and range of retail, commercial and other uses makes it one of the best liked town centres in the Cotswolds.

5.35 However, although it has ridden the retail storms of the last decade better than many, with few vacant units, we cannot be complacent in the face of increasing competition from online retailing. The policy takes account of the new Use Classes Order which defines Commercial, Business and Services Uses by combining previous retail, financial services, café/restaurant, offices and other social uses. It updates and refines Policy EC8 of the adopted Local Plan to bring it up to date with the NPPF and the Order and is consistent with the role of the Market Square – which it defines as the primary shopping area – and other parts of the town centre as a 'Key Centre' in the District.

5.36 The neighbourhood plan project has reviewed the town centre boundary defined by the Local Plan and found that it continues to serve this purpose. The Market Square remains the 'jewel in the crown' as one of the most identifiable in the country. Its mix of ground floor (and above in some cases) commercial uses, all operating from historic buildings around its edge, plays a number of vital roles: in defining the essence of the character of the Conservation Area, in operating as a critical mass of vital and viable commercial activity (from shops to bars, pubs and hotels) and in generating a strong demand for tourism. It is vital that these roles are sustained.

5.37 The other parts of the town centre – Digbeth Street, Sheep Street, Church Street, Talbot Court and Brewery Yard – play a vital supporting role to the Market Square, providing locals and visitors alike with a wider range of commercial offers. However, there are some dwellings interspersed in some of them, as well as uses better located beyond the Market Square like takeaways.

5.38 The goal is to sustain this special retail-led mix of commercial uses within the Town Centre to promote a thriving daytime and evening economy whilst recognising the important contribution that other uses on its fringes, including residential development, can make in promoting a vibrant and competitive town centre where people want to visit, live and work.

The policy will operate alongside national and other development plan policies relating to heritage assets (including the Design Code of this plan), as the Conservation Area covers the whole of the Town Centre and beyond. There are also more than 60 listed buildings of various grades with most others have local heritage and/or townscape value. It must also operate within the flux of permitted development rights applying to town centres, although some of those rights are not applicable here because of its heritage assets.

5.39 The policy also encourages the use of upper floors by refining Policy EC8 to acknowledge the challenges of doing so in an historic environment and makes provision for the relocation of some parking spaces to the new public car park to be delivered by the allocation in Policy STOW7. Detailed proposals have not yet been drawn up, but the principle has been a feature of the community engagement activities. Many spaces are occupied by those working in the Town Centre (and having to drive from well beyond the town to access affordable housing) and the opportunity to relocate some spaces will enable public realm improvements to reduce the effect of vehicles in this special space.

Policy STOW9: Playing Field Facilities

A. Proposals to upgrade, extend or replace the pavilion facilities at Queen Elizabeth II Field, as shown on the Policies Map, will be supported provided that any extension of the building is no larger than 150% of existing floorspace and, if a replacement, it is located on or immediately adjoining the existing building footprint and its massing and height will not undermine the open character of the Local Green Space.

B. Proposals to provide a new pavilion facility to serve the King George's Playing Fields, as shown on the Policies Map, will be supported provided the building adjoins the existing play facilities and its massing and height will not undermine the open character of the Local Green Space.

5.40 This policy responds to a desire to improve these important community facilities on the western and eastern edges of the town respectively. The playing fields are proposed as Local Green Spaces in Policy STOW10 but in each case it is considered possible to extend the existing building (at QEII if kept to no more than half the size again, i.e. 150% of the existing pavilion) or to erect a new building (at King Georges) without harming the open appearance or function of those spaces.

Policy STOW10: Local Green Spaces

The Neighbourhood Plan designates the following Local Green Spaces, as shown on the Policies Map:

- 1. Stow Primary School Playing Field, Stow**
- 2. King George's Field & Play Park, Stow**
- 3. Allotments, Stow**
- 4. The Park/Back Walls, Stow**
- 5. Lower Swell Playing Field**
- 6. Fox Drive Open Space, Lower Swell**
- 7. St Mary's Close Open Space, Lower Swell**
- 8. QEII Field, B4068, Stow**
- 9. The Shrubbery, Stow**

Proposals for inappropriate development within a Local Green Space will only be supported in very special circumstances.

5.41 This policy designates nine Local Green Spaces to protect them from inappropriate development. All of them are considered to meet the tests of NPPF §102 to show they are cherished by the local community (see Appendix A for further details). The effect of the designation is to give the spaces the equivalent protection as national Green Belt policy, meaning that only very special circumstances will justify inappropriate development.

Policy STOW11: Stow and the Swells Design Code

Development proposals must accord with the Cotswold and Stow and the Swells Design Code.

5.42 This policy supplements the Cotswold Design Code (in Appendix D of the adopted Local Plan) with a Design Code for the town and parish. It is a lengthy document and so is published separately to the plan, but the policy extends the full weight of the development plan to its contents.

5.43 The Code has been structured to fit neatly alongside the Cotswold Design Code so they can easily be read together. It has divided the town into four ‘character areas’ that are reasonably distinct in following the age of growth of the town over the centuries. It sets out for each character area how the principles of the Cotswold Design Code specially apply to that area, accepting that what might ‘fit in’ with one part of the town may not fit in with another. The Code also covers Lower Swell and Upper Swell as separate character areas with their own design guidance.

5.44 As with the Cotswold Design Code and the AONB Management Plan, it seeks to strike a balance between prescription and flexibility. In some regards – notably building form and materials – the Cotswold vernacular context is so strong that any significant departure would like lead to a harmful scheme. In others, the Code offers designers a degree of flexibility to accommodate modern solutions, and there are examples of how this has worked well in recent years.

Policy STOW12: Buildings of Local Importance

The directly or indirect effect of a development proposal on the significance of a Building of Local Importance (listed in Appendix A) will be taken into account in determining the application by weighing the scale of any harm or loss against the significance of the heritage asset.

5.45 This policy assists with the implementation of Local Plan Policy EN12 and §203 of the NPPF, both of which set out how proposals affecting Buildings of Local Importance – or ‘non-designated heritage assets’ as they are known – should be handled. Having carried out the design coding analysis, the councils have been able to draw up a list of such buildings, as set out in Appendix B.

5.46 The councils have followed the guidance published by Historic England so that the list is derived from a consistent and transparent methodology based on set selection criteria. The majority of the buildings lie within one of the Conservation Areas and so already benefit from some degree of extra protection in the planning system, most notably in respect of controlling their demolition. However, this status, and the specific local interest ascribed to each building, will enable their intrinsic architectural or historic interest to be defined and taken into account in future development proposals.

5.47 To be clear, this status is not the same as statutory listing (carried out by Historic England) which is governed by a combination of separate planning law (the Listed Buildings & Conservation Areas Act 1990), Local Plan policy (EN10) and national policy (elsewhere in the NPPF).

Policy STOW13: Zero Carbon Buildings

A. All development should be ‘zero carbon ready’ by design to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping.

B. Proposals for new and refurbished buildings should demonstrate that they have been tested to ensure the buildings will perform as predicted and a planning condition will be attached to a permission to require the provision of a Post Occupancy Evaluation Report to the Local Planning Authority within a specified period. Where the Report identifies poor energy performance and makes recommendations for reasonable corrective action, the applicant must demonstrate that those actions have been implemented before the condition will be discharged.

C. Wherever feasible, buildings should be certified to a Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m2/year. Where schemes that maximise their potential to meet this standard by proposing the use of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the Design Code Character Area within which the proposal is located, this will be supported, provided it can be demonstrated that the scheme will not cause substantial harm to a designated heritage asset. Proposals that meet this standard are exempted from the provisions of clause B.

D. All planning applications for major development are also required to be accompanied by a Whole Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its entire life.

E. An Energy Statement will be submitted to demonstrate compliance with the policy (except for householder applications). The statement will include a passive design capacity assessment to demonstrate how opportunities to reduce the energy use intensity (EUI) of buildings over the plan period have been maximised in accordance with the energy hierarchy. Designers shall evaluate the operational energy use using realistic information on the intended use, occupancy and operation of the building to minimise any performance gap.

5.48 This policy is in five parts, the combination of which is intended to deliver the type of step change required by §152-154 of the NPPF in making ‘radical reductions’ in carbon emissions. Much of its focus is on the energy performance of all new developments in the area to encourage and incentivise the use of the Passivhaus or equivalent standard of building design.

5.49 Along with the passive design capacity assessment, it is anticipated that designers will demonstrate compliance using a design for performance methodology such as the Passivhaus Planning package or CIBSE TM34 Operational Energy. Achieving this level of performance will make a significant contribution to mitigating climate change that the Neighbourhood Plan can deliver. The Government has confirmed that the Planning and Energy Act 2008 will not be amended. As a result, a Written Ministerial Statement on this subject in 2015 is out of date and the setting of energy efficiency standards at the Local Plan or Neighbourhood Plan scale is permissible.

5.50 Clause A of the policy requires developers to ensure they address the Government’s climate change targets and energy performance at the very initial stages of design as encouraged by the District Council’s own Net Zero Carbon Toolkit 2021. ‘Zero Carbon Ready’ by design means making spatial decisions on layout and orientation of buildings at the outset to maximise the passive design benefits (‘free heat’) of a site and avoids leaving this to technical choices and assessment at the Building Regulation stage, by which time the opportunity may have been lost.

5.51 Clauses B and C are intended to operate together in a way that incentivises the use of the Passivhaus Planning Package (PHPP) or equivalent design methodology. Firstly, clause B requires the developer of a consented housing development scheme of any size to carry out a Post-Occupancy Evaluation (POE) including actual metered energy use, and to submit the report to the local planning authority. It will be implemented by attaching a planning condition, which will only be discharged once the report has been submitted and any recommended actions to rectify any performance gap with the design stage assessment are carried out by the developer. Passivhaus certified schemes will not fail in this way and they are therefore exempted from this policy requirement. Further guidance on the purpose and operation of clause B is contained in Appendix D of this document.

5.52 Secondly, clause C encourages all new buildings, no matter what their intended use or size, to adopt the Passivhaus Planning Package (PHPP) or equivalent design methodology where it is feasible to do so. It is accepted that there may be some factors that make its use unfeasible, for example, the topography and orientation of the site. The policy will also ensure that expensive and unnecessary retrofit costs are not passed down to building occupiers in the future, particularly in an area which has relatively high property values. Until such standards can be required by planning policy it is hoped that the exemption of schemes using the standard from the POE condition will be an effective incentive, especially as the build costs of the doing so are now only just above those of conventional buildings.

5.53 The policy recognises that occasionally a feasible design solution cannot adhere to all of the parameters of the Design Code of its local area, especially given its special historic and architectural interest. It therefore strikes the balance in favour of that solution unless the proposal will cause substantial harm to a Conservation Area or to the setting of a listed building. Applicants will be expected to address this matter in the Design & Access Statement.

5.54 Proposals seeking to apply the PHPP must be able to demonstrate that the Passivhaus standard can be achieved. Prior to commencement a 'pre-construction compliance check' completed by a Passivhaus Designer accredited by the Passive House Institute (PHI) will be required and secured by condition. Upon completion a Quality Approved Passivhaus certificate for each building will be required prior to occupation, again secured by condition.

5.55 In the absence of any current adopted or saved Local Plan policy covering the energy performance of new buildings, Clause D requires all major development proposals (as defined by the NPPF) that are not householder applications to be accompanied by a Whole Life-Cycle Carbon Emissions Assessment. This requirement will be added to the Cotswold Validation Checklist for outline and full planning applications applying to proposals in the Neighbourhood Area until such a time that there is a Districtwide requirement.

5.56 In addition, Clause E requires an Energy Statement to be submitted to cover the following as relevant and proportionate to the nature and scale of the proposal:

- an assessment of the proposal to minimise regulated and unregulated emissions, the embodied emissions and the emissions associated with maintenance, repair and replacement of the new building(s), as well as its dismantling, demolition and eventual material disposal;
- a calculation of the energy and carbon emissions covered by the Future Homes Standard and Building Regulations and, separately, the energy demand and carbon emissions from any other part of the development that are not covered by the Future Homes Standard or Building Regulations;
- the proposal to reduce carbon emissions beyond the Future Homes Standard and Building Regulations through the energy efficient design of the site, buildings and services;
- the proposal to further reduce carbon emissions through the use of zero or low-emission decentralised energy where feasible;
- the proposal to further reduce carbon emissions by maximising opportunities to produce and use renewable energy on-site, utilising storage technologies where appropriate;
- the proposal for a demand-side response, specifically through installation of smart meters, minimising peak energy demand and promoting short-term energy storage; and
- an analysis of the expected cost to occupants associated with the proposed energy strategy.

5.57 Every new build or redevelopment project in the Neighbourhood Area provides an opportunity to make a difference and a contribution towards meeting our climate change targets for 2050. This new information requirement need not be an unreasonable expectation of even the smallest schemes for new buildings. Land values in the town and parish are high relative to build costs and ought to be sufficient to ensure requirements to tackle improving energy and carbon performance are viable.

Policy STOW14: Walking & Cycling in the Town and Parish

Proposals that will improve the existing network of footpaths and cycleways through and out of Stow on the Wold will be supported. Proposals to create an off-road Stow to Bourton Cycle Path will be supported.

5.58 This policy brings an emphasis to the need for development proposals in the area to take proper account of their effects on walking and cycling. The town and villages are compact with few properties in the town more than a 15 minute walk to the Market Square, although its topography can be challenging in places. With the broader aim of reducing the effects of traffic in the town more must be made of the opportunities to encourage walking and cycling.

5.59 With that in mind Policy STOW7 will enable new routes to be created on the northern side of the town as residents and users of the new car park and community hub are encouraged to walk and cycle between that new area and the Town Centre and Tesco superstore. There is also the ambition of finding a way of creating an off-road cyclepath to link the town with its neighbour Bourton on the Water to the south.

Policy STOW15: Vehicle Parking

A Proposals for residential developments must meet the standards for off-street parking provision set out in the Design Code.

B Proposals to create shared off-street vehicle parking in Lower Swell will be supported, provided:

- **they are of a size and location that does not harm the special historic character and appearance of the Conservation Area;**
- **they do not cause significant harm to the amenities of local residents; and**
- **they include provision for EV charging.**

5.60 This policy seeks to ensure that new housing developments do not exacerbate already serious parking problems, especially in Stow on the Wold and that their parking provision will be adequate to meet likely future needs generated by the development, whether for residents, visitors or trades/delivery people. Community engagement on the plan has highlighted the problems the town faces in accommodating parking for residents, businesses and visitors on historic streets and in surrounding residential areas.

5.61 The policy also encourages land interests, including local residents, in Lower Swell to bring forward proposals to relocate the sporadic on-street and off-street car parking in the village to locations that are safer but still convenient. In doing so, those proposals may enhance the appearance of the Conservation Area and enable new provision for EV charging to benefit local residents that cannot access off street charging points at home.

Policy STOW16: Digital Infrastructure

Proposals to improve the digital infrastructure in the area by way of the installation of new transmitters, antennas and junction boxes will be supported unless they will cause substantial harm to designated heritage assets or to the special landscape and scenic beauty of the Area of Outstanding Natural Beauty.

5.62 This policy seeks to encourage the provision of new digital infrastructure that will drive technological advancements necessary to support new businesses and homes. Creative industries, office space and commerce rely on high speed, reliable connectivity but this is difficult in much of this rural area. It is acknowledged that many such works may be permitted development but where they are not then the policy requires that substantial harm is demonstrated to justify a refusal of planning permission.

6. IMPLEMENTATION

6.1 The Neighbourhood Plan policies will be implemented through the determination of planning applications for development in the Town and Parish by the local planning authority.

Development Management

6.2 The planning authority will use a combination of the Local Plan and Neighbourhood Plan policies to inform and determine its planning application decisions. The Town and Parish Councils are statutory consultees on planning applications made in the area and they will be made aware of any future planning applications or alterations to those applications by the planning authority. They will seek to ensure that the Neighbourhood Plan policies have been identified and applied correctly by applicants and by officers in their decision reports. The Town and Parish Councils will also prepare and publish an annual monitoring report outlining how the Neighbourhood Plan has been applied.

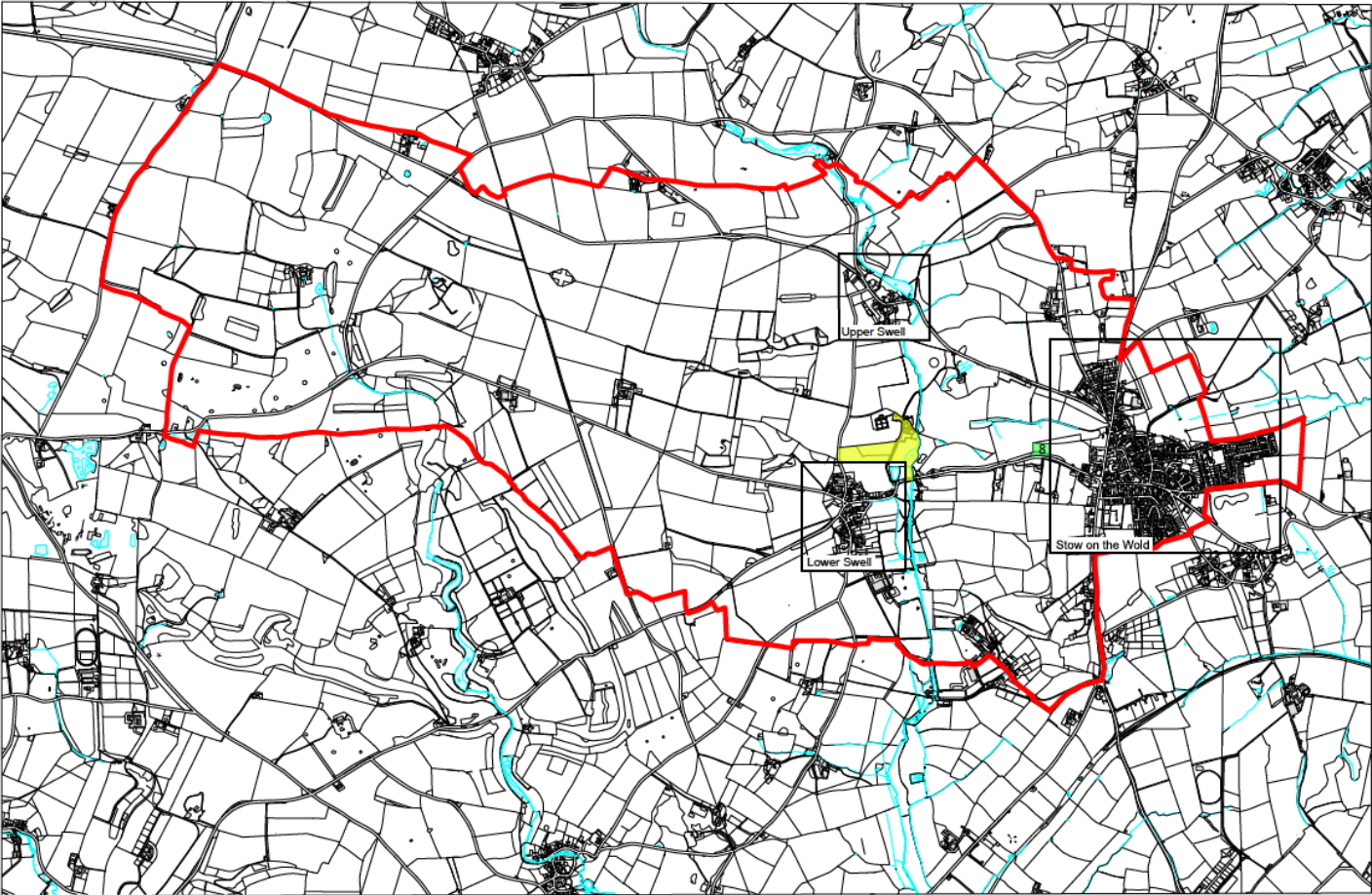
Local Infrastructure Improvements

6.3 Where opportunities arise through the Community Infrastructure Levy and S106 obligations to secure financial contributions to invest in improving local infrastructure, the Town Council proposes that the priorities for investment are Market Square public realm improvement and the Community Hub.

Other Non-Planning Matters

6.4 During the process of preparing the Neighbourhood Plan, there have been many ideas for improving or addressing current problems in the area that lie outside the scope of the land use planning system to control or for which the timing of the plan is too soon. The Town and Parish Councils have noted these issues and will take them forward through their day-to-day business and in partnership with the local community and relevant parties. These include additional car parking and an increase in public EV charging points at Lower Swell.

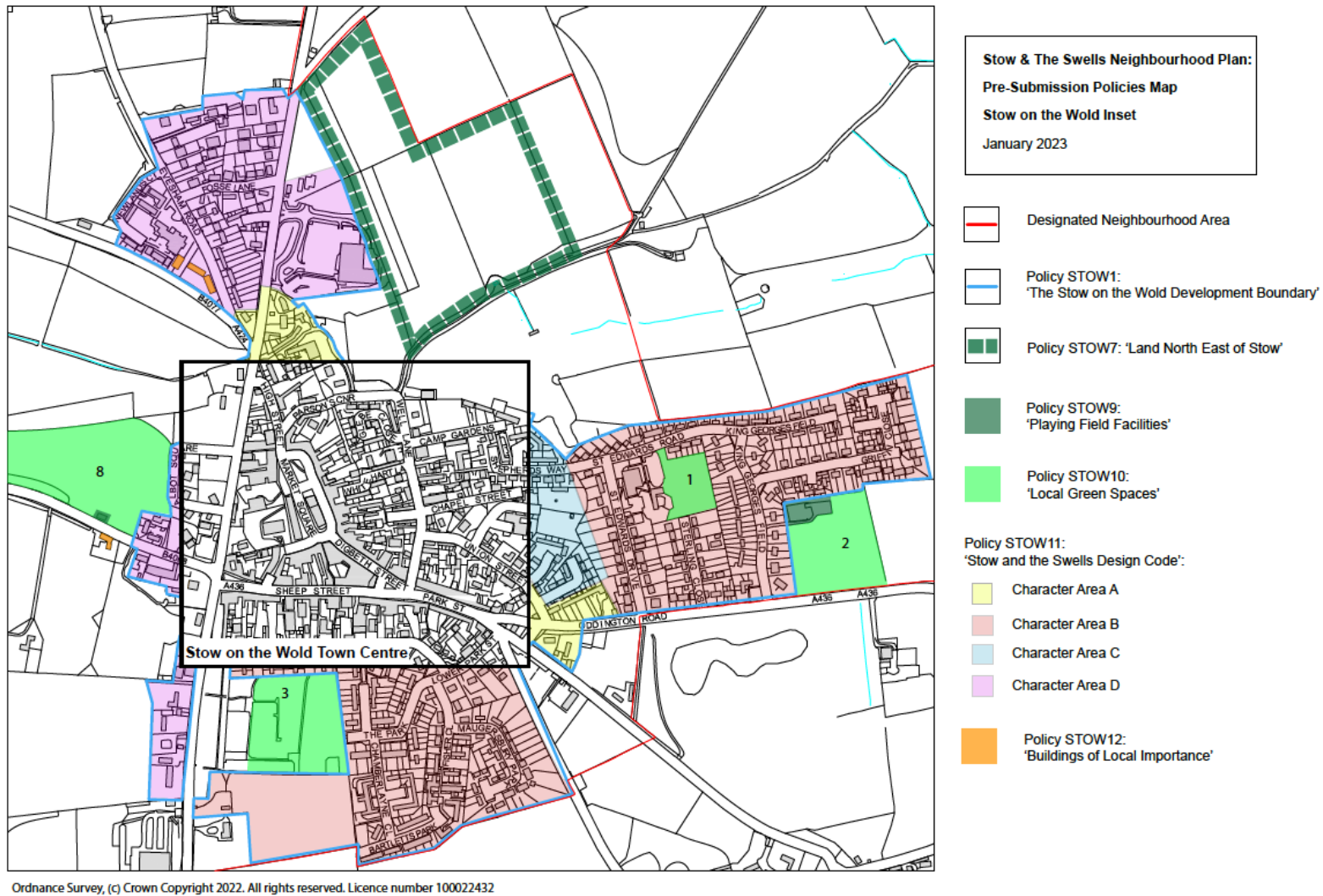
POLICIES MAP & INSETS

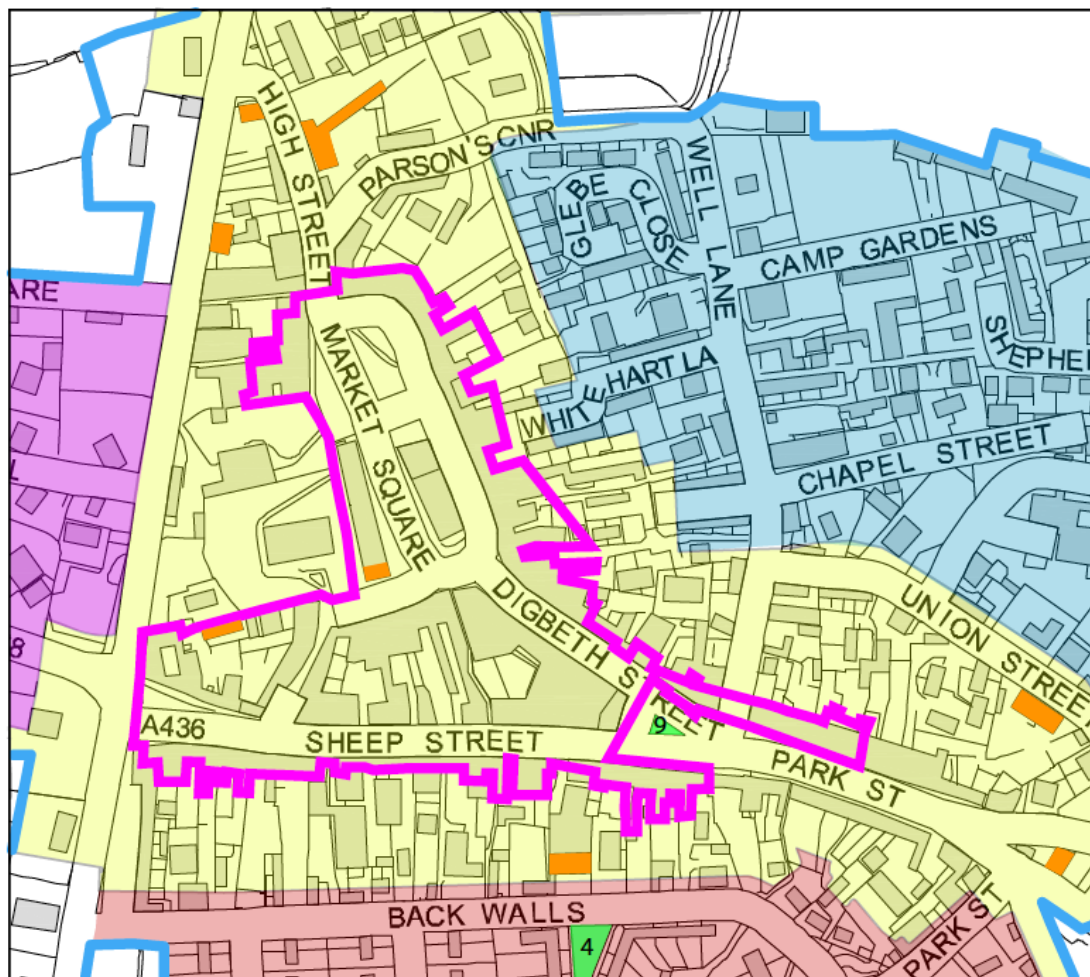


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Stow & The Swells Neighbourhood Plan:
Pre-Submission Policies Map
January 2023









- Designated Neighbourhood Area
- Lower Swell Conservation Area
- Policy STOW10: 'Local Green Space'

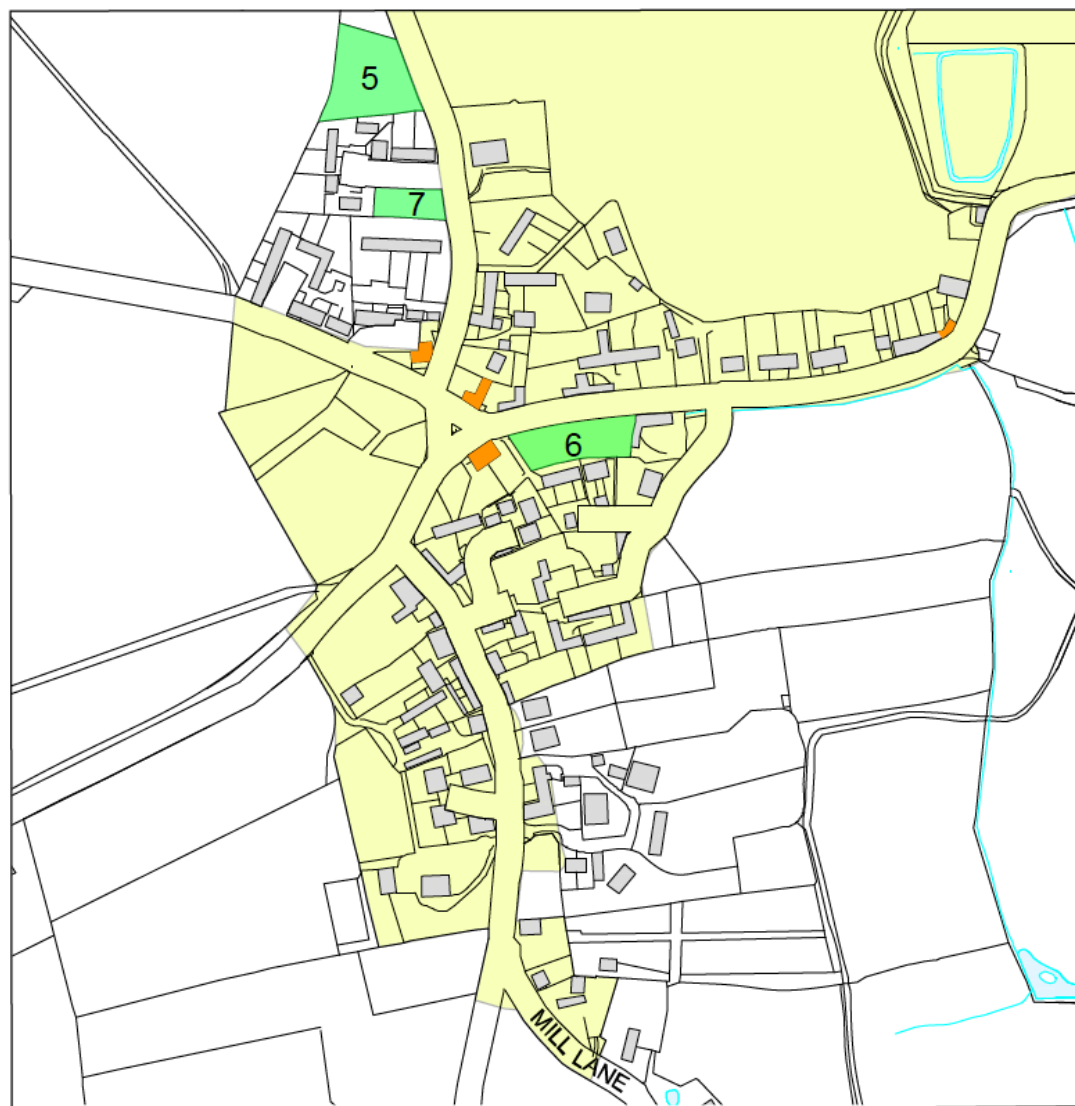




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**Stow & The Swells
Neighbourhood Plan:
Pre-Submission Policies
Map - Stow on the Wold
Town Centre Inset
January 2023**

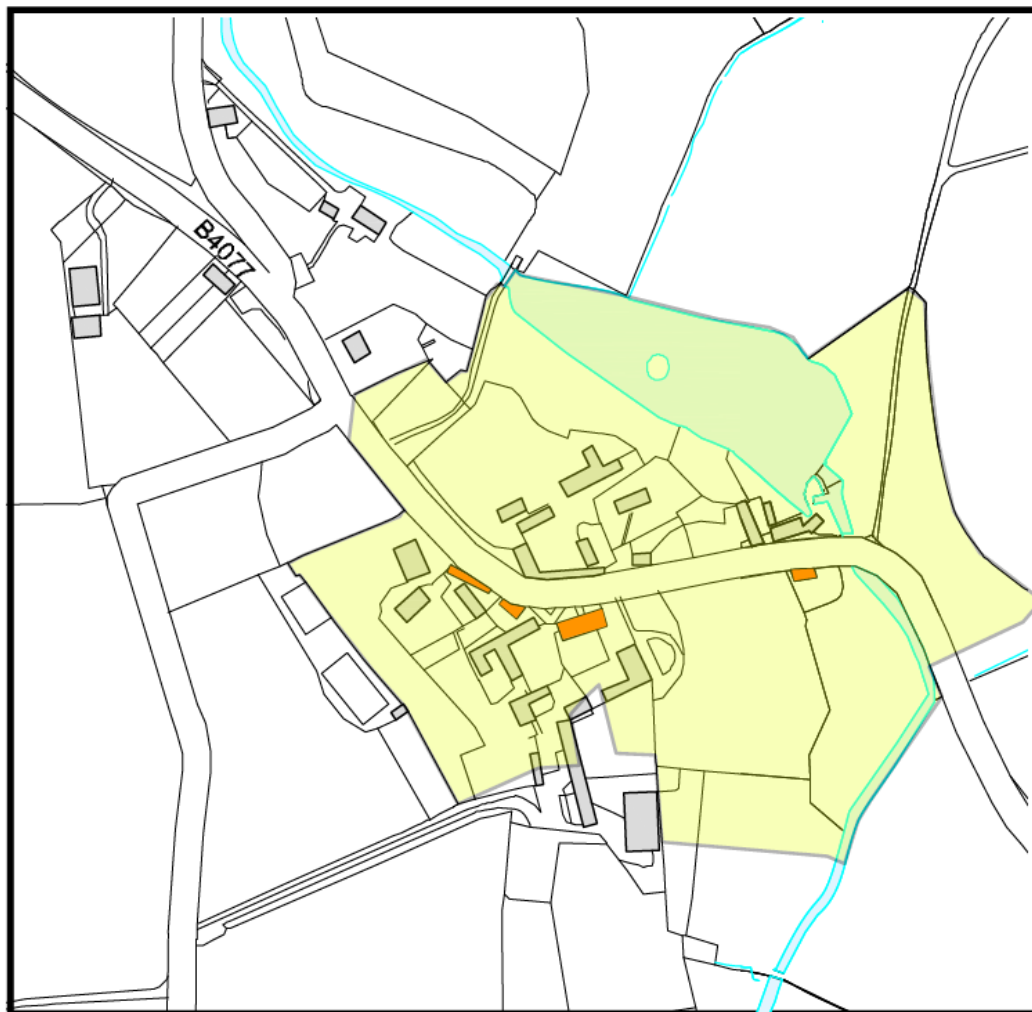
-  Policy STOW1:
'The Stow on the Wold Development Boundary'
-  Policy STOW8: 'Market Square'
-  Policy STOW10:
'Local Green Spaces'
- Policy STOW11:
'Stow and the Swells Design Code':
 -  Character Area A
 -  Character Area B
 -  Character Area C
 -  Character Area D
-  Policy STOW12:
'Buildings of Local Importance'



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Stow & The Swells Neighbourhood Plan:
Pre-Submission Policies Map
Lower Swell Inset
 January 2023

- Policy STOW10:
'Local Green Space'
- Policy STOW12:
'Buildings of Local Importance'
- Lower Swell Conservation Area



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Stow & The Swells Neighbourhood Plan:
Pre-Submission Policies Map
Upper Swell Inset
 January 2023

- Policy STOW12:
'Buildings of Local Importance'
- Upper Swell Conservation Area

APPENDIX A: LOCAL GREEN SPACES (STOW10)

The policy designates a number of spaces as Local Green Spaces as per §102 of the NPPF. Set out below is a brief description of the factors that may make each space special – all lie in close proximity to, and are cherished by, their local communities and none are considered large tracts of land.

Stow Primary School Playing Field

An essential part of the school facility but limited in its size to accommodate one small football pitch and therefore precious to the successful operation of the school.



King George's Field & Play Park

An important recreational area serving the eastern side of the town and including a play park and special gated entrance in stone and decorative iron work on Oddington Road.



Stow Allotments

A popular social as well as green infrastructure asset for the town.



The Park/Back Walls, Stow

An area of amenity land laid out as part of the Park estate in the late 1950s and an essential part of its green character.



Lower Swell Playing Field

A popular local facility serving the village and used by the school.



Fox Drive Open Space, Lower Swell

Although not publicly accessible this open space lies at the heart of the village and is an essential part of its character and identity.



St Mary's Close Open Space, Lower Swell

This area of mature planting and open space was laid out as part of the St. Mary's Close development and is a precious asset for the village.



QEI Field

An important sports and recreational area serving the western side of the town and also hosting annual community events.



The Shrubbery, Sheep Street/Digbeth Street, Stow

A small green space at the edge of the town centre that is popular with visitors to the town.



APPENDIX B: BUILDINGS OF LOCAL INTEREST (POLICY STOW12)

The policy identifies a number of buildings of local interest. Set out below is a brief description of the local heritage interest of each building.

Fosseway Farm Cottage, High Street – a range of dwelling and barn/ancillary buildings in the Cotswold vernacular occupying a prominent, large site at the northern entrance to the Market Square



Google ©

Fern Bank, High Street - in the Cotswold vernacular, modified but retaining many original window and stone quoin features, occupying a very prominent position in the streetscene at the northern entrance to the Conservation Area



Google ©

Talbot Cottage, Fosse Way – comprising No2 of three storeys and a lower former coach house both in the Cotswold vernacular, occupying a prominent location at the back of pavement on the Fosse Way.



Google ©

Building, corner of Market Square and Church Street – a two storey building with a chamfered corner, with a ground floor retail unit of traditional design and low slate roof, adjoining the taller listed building ('5224 The Square') in the Cotswold vernacular and of considerable group value and occupying a prominent corner site with Church Street in the immediate setting of St Edwards Church and connected to its listed boundary wall and archway.



Google

The Bell Inn, Oddington Road – a three storey main building with two storey side and rear additions in the Cotswold vernacular with distinctive double bay window and porch arrangement on the ground floor frontage, occupying a very prominent position at the entrance to the main part of the Conservation Area and its extension towards Mangersbury.



The Old School House, Union Street – impressive former girls school building of 1901 by architect H.W.Chatters, now a home, rock faced with most original architectural details surviving, including cupula tower (visible in views above rooftops from the west), large windows on N and E facades with ogee gable and pediment above on N side, with “gawky, vaguely Jacobean detail” (Pevsner).



Our Lady & St Kenelm RC Church, Back Walls – described in Pevsner as a converted former infant school of 1836, a single storey building in the Cotswold vernacular set back from the road; stained glass window by Donald Brooke, c 1950.



Google ©

Hillside & West Deyne (former Swell Villas), Lower Swell Road – a pair of Victorian cottages.



Google ©

Westcombe and The Limes (former Batsford Villas), Tewkesbury Road – a pair of early Edwardian villas, two storeys with large two storey bay windows, original prominent twin window gabled W dormer and decorative stonework around windows and above doors; front gardens with lawns and original low brick and ironwork railings and gates. Extended to the E but successful in maintaining grant character.



Google ©

Newlands House, Evesham Road – likely to be by a fine group of c.1930 by Seth-Smith & Monro in with gables and mullioned windows of same vernacular style as Walter Reynolds Homes on adjacent site; secluded within grounds but a glimpse view of the main façade from the main road through gates.



Google

Walter Reynolds Homes, Evesham Road – ‘a fine group of 1928 by Seth-Smith & Monro in two sections set at an angle with gables, mullioned windows and hipped bays’ (Pevsner), almshouses operated by local charity, occupying a prominent site on the NW entrance to the town off Fosseway



Google ©

Stow on the Wold Almshouses, Church Walk – a terrace of four and a pair of low, stone one bed cottages facing on to a small communal courtyard with their rear, windowless elevations on to Church Walk next to the grounds St. Edwards Church. The first record of almshouses on this site is in 1594, when the buildings were derelict and rebuilt in that year. The current almshouses are thought to have been built in the mid 18th century.



Corner Cottage, B4068, Lower Swell - of the Cotswold vernacular occupying a prominent site at the eastern entrance to the village and has group value with the listed Travellers Joy to Leys View Cottage



Leys View Cottage, B4068, Lower Swell - of the Cotswold vernacular and has group value with the listed Travellers Joy to Corner Cottage.



Google ©

Horseshoe Cottages, Cotswold House and Barn Cottage, B4068, Lower Swell - of the Cotswold vernacular and have group value in framing the war memorial village green and are prominent in the street scene.



Google ©

Lower Swell Village Hall - of the Cotswold vernacular, occupying a prominent location at the centre of the second, smaller village green and with significant historic social value.



Barn, Upper Swell Farm, B4077 Upper Swell – a large barn that is part of a larger converted farm complex, of Cotswold stone walls (with a regular pattern of triangular winnowing holes and a Victorian post box inserted into its wall) and a Welsh slate roof, occupying a prominent location at the centre of the village.



Bridge Cottage, B4077, Upper Swell – modern (1929) but in the Cotswold vernacular and with the listed Old Mill opposite creating a delightful entrance to the village.



Nos 1 & 2, Upper Swell House, B4077, Upper Swell – a semi-detached pair of cottages in the Cotswold vernacular behind a low rubble stone wall incorporating a former drinking fountain, occupying a prominent location in the village centre and with group value with adjoining the barn of Spring House.



Barn, Spring House, B4077, Upper Swell – a low, long former barn at a diagonal to the main road creating interest in the streetscene and with group value with adjoining Nos 1 & 2 Upper House.



APPENDIX C: SPECIFICATION FOR STOW ON THE WOLD BUSINESS & COMMUNITY BARN

VISION

To expand and support the economy of Stow on the Wold and the Swells by facilitating and supporting entrepreneurship and creativity towards a more balanced mix of tourism, retail and commercial enterprise by providing progressive, sustainable, and sympathetic spaces for dynamic and aspiring entrepreneurs and community use.

FOCUS

The focus for the Business & Community Barn will be for creative businesses, home working space and community events including those supporting the green economy. It will work with other venues in the town to create an integrated and appropriate offer to those wishing to hire space for events and activities.

BUILDING DESIGN AND MATERIALS

The Business & Community Barn sits within the Area of Outstanding Natural Beauty (AONB). As such the design of buildings must comply with the Cotswold Design Code and the Stow on the Wold and the Swells Neighbourhood Plan Design Code. In essence buildings must be complementary to the Cotswold vernacular. Buildings which abut countryside should also reflect the rural surroundings. Final design to be agreed with Stow on the Wold Town Council & Cotswold District Council.

OVERALL SPECIFICATION

The overall size of the Business & Community Barn could be approximately 1000 sq m. consisting of four main areas:-

- Circa 185 sq m of flexible space for businesses, consisting of units suitable for starter and pop-up businesses requiring space as offices, meetings rooms, retail or advisory/agency services.
- Circa 600 sq m of space including a serviced hall suitable to take about 200 people seated with associated facilities and capable of being divided into up to three smaller spaces suitable for events, meetings, performances and learning.
- Circa 100 sq m of space for a commercial gym sited next to the hall to enable exercise activities to take place in association with the gym.
- Circa 30 sq m of space for Town Council offices.

Toilets to be provided in two areas adjacent to the main hall serving all users of the building.

In accordance with the Stow on the Wold and the Swells Neighbourhood Plan Access & Parking Policy document (SSNP7), sufficient parking should be provided to serve the needs of all users of the Business & Community Barn, including businesses, customers, visitors including those using the hall for events and deliveries. This could be provided in association with the public car park also to be provided on this site.

DETAILED SPECIFICATION

Business space will focus on office and retail users in arts and crafts, wellbeing and rehabilitation, digital and tech, climate change mitigation, start-up businesses, learning and business support. Home workers will be encouraged to come to the Business & Community Barn to prevent social isolation and encourage shared learning and innovation. It could comprise:

- A 35 sq m open plan co working office space to accommodate 10 hot desks and 1 meeting room to accommodate 6-8 people available for flexible working and meetings

- 6 x 25 sq m offices/retail units should be available for rent for periods of under one year. Retail units should have mezzanine floors for effective use of space
- At least one of the potential retail spaces should be available for pop-ups.
- With the business space supported by ultrafast broadband.

CENTRAL HALL

The central hall of 600 sq m will provide opportunities for both business users and the community. There should be a storage area sufficient to take 200 chairs and 20 x 6 person tables. Shared kitchen facilities could enable event catering and workspace refreshment. Soundproof room dividers should enable the hall to be broken up into smaller spaces.

GYM

The focus of the gym (of approx. 100 sq m gym space) will be wellbeing and rehabilitation. An important support service for an area with a significantly large population of people over the age of 65. Effective use of space could be provided by a mezzanine floor.

COUNCIL OFFICES

Provision for 30 sq m dedicated to new Town Council office space.

APPENDIX D: POST OCCUPANCY EVALUATION GUIDANCE (POLICY STOW13)

This guidance note sets out how Post-Occupancy Evaluation (POE) should be undertaken to accord with clause B of Policy STOW13 and is derived from published guidance and best practice.

1. Post-Occupancy Evaluation (POE) is the method of obtaining feedback on a building's energy performance 'in use', to ensure it measures up to the commitments made by the team that designed and built it. It offers significant potential to address the performance gap and occupant satisfaction.
2. Where a monitoring regime to ensure the 'as designed' building performance targets are achieved in practice for all new and refurbished buildings is required, it is important that data is collected robustly, following good practice POE principles. It is therefore recommended that for residential development the POE methodology in section 11.4 of the Home Quality Mark ONE: Technical Manual: England, Scotland & Wales SD239 (2018)⁵⁸, or as updated, is used as a guide for meeting this requirement. For non-residential buildings the BSRIA Soft Landings and Design for Performance framework (BG 76/2019), or as updated, may be used.
3. Applicants are required to set out in their Energy Statement how their monitoring regime, based on the HQM, BISRIA or similar methodology, will work in practice and be independently verified by a third party. The Energy Statement to be submitted with the planning application.
4. As each new or refurbished building comes into use, the developer must ensure performance monitoring and data collection for all relevant parameters for one whole year is carried out once the building is substantially occupied, in line with good POE practice for residential or non-residential uses. This verification process should entail, after appropriate commissioning has taken place, comparison of the 'as designed' parameters (energy, carbon, air quality and overheating risk) to monitoring data under the same categories, to assess and compare actual performance.
5. In order to account for seasonality, a minimum of 12 months monitoring data is required. On the other hand, to account for actual weather, the modelling results can be adjusted with degree days for the relevant year. A 'performance gap metric', which will compare designed and actual performance (e.g. a percentage difference) for each of the 4 required parameters (energy, carbon, air quality and overheating risk) should be issued at POE stage. This needs to be issued for both the 'central' scenario and the 'lowest acceptable performance /reasonable worst-case scenario' as a minimum, with multiple scenarios considered if at all possible. The process and reporting methodology used for the POE will need to be repeatable, so that performance can be monitored for at least 2 annual space heating cycles.
6. A report will then be required to be submitted to both building owners/occupiers and to Cotswold District Council, which states the performance gap metric and identifies any reasons for deviation from predicted energy usage, carbon emissions, indoor air quality and overheating performance, as well as recommendations for reasonable corrective action that will be taken to reduce or eliminate the performance gap.
7. The submission of the monitoring report to owners/occupiers and the council must be secured by planning condition, to be determined at the time of application based on case-specific factors. The applicant must demonstrate that the reasonable corrective actions

committed to in the monitoring report, and subsequently agreed by Cotswold District Council, have been implemented through another annual heat cycle before the condition will be discharged.

APPENDIX E: STATEMENT ON MAJOR DEVELOPMENT IN THE COTSWOLD AREA OF OUTSTANDING NATURAL BEAUTY (POLICY STOW7)

Purpose

The purpose of this statement is to set out the case for allocating land for a major, mixed use development scheme on Land East of the Town in Policy STOW7 in the Cotswold Area of Outstanding Natural Beauty (AONB).

Background

Following its extensive community engagement work and site assessment process (including a sustainability appraisal) the Town Council (TC) is proposing to allocate land off Broadwell Lane for approx. 170 homes, a community hub and public car park.

All of the neighbourhood area lies within the AONB. AONBs benefit from the highest status of protection in relation to conserving and enhancing landscape and scenic beauty. The TC acknowledges its obligation in respect of Section 85 of the Countryside and Rights of Way Act 2000, which places a duty on relevant authorities to have regard to the purpose of conserving and enhancing the natural beauty of the area of the AONB.

It is also aware that the National Planning Policy Framework (NPPF) requires that ‘great weight’ be given to that objective in decision taking (§176), which may also be applied to plan making, and that its §177 states:

‘permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.’*

The TC takes this obligation seriously and has discussed its NP vision, objectives and policies with the local planning authority, Cotswold District Council (CDC) and with the Cotswolds Conservation Board (CCB), which has responsibility for managing the AONB. It has reviewed the relevant policy and guidance published by the CCB for this purpose, notably the Management Plan 2018-2023, the Landscape Character Assessment, the Local Distinctiveness & Landscape Change report and the Position Statements on Housing and Landscape-led Development.

Proposal

The draft proposal comprises five essential features – the delivery of:

1. Approx. 170 homes (extending to approx. 240 homes on land outside the NP area) with at least 40% affordable housing
2. Approx. 150 space public car park to meet the needs of town visitors, employees and residents

3. A multi-functional building of community facilities and business workspace
4. New public footpaths to the town centre and adjoining superstore development
5. A design code and landscape strategy to successfully stitch the scheme into the town and surrounding landscape, as well as to deliver biodiversity net gain on site

It is driven by the vision of making the town a more self-sustaining community by 2030 than it is at present. Its population is aging quickly and its economy has become too dependent on tourism. Access to affordable housing is increasingly difficult and traffic and parking are blighting its national heritage significance.

The housing scheme will be the first of its type in the town for two generations. Its combination of smaller open market homes, First Homes, social rent and shared equity affordable homes will make a step change in meeting local housing need to shift its demographic profile. It will also create sufficient land value to enable a viable scheme to be delivered that includes its other essential features.

The car park scheme will increase total capacity for the town to enable spaces in Market Square to be relocated and the space reused for public realm improvements. The site will be well connected to the town centre – a ten minute walk – and to the superstore with a new footpath network. The highways access will be on to Broadwell Lane to the north only.

The community building will provide the town with much needed, modern facilities that it currently lacks. It will also meet the growing demand for managed business space and will provide a support hub for the town's working from home population.

The design code will ensure the scheme is inspired by The Park estate on the opposite side of the town, a development considered to capture the essence of the Cotswold vernacular in a modern form. All of the new buildings will be of a zero-carbon energy performance standard with on-site renewable energy generation. Its associated landscape strategy will blend the scheme into the wider countryside and incorporate new public open space and on-site biodiversity net gain.

The land is available now and is being actively promoted by the landowner and development partner. It is expected the scheme will be delivered in two phases: the first in the NP area by 2028 with the early delivery of the car park and landscape strategy, then of the community building before completion; the second on the land outside the NP area.

A suite of technical reports has been prepared to inform the evolution of the proposal and its environmental assessment. They are published separately in the evidence base and cover landscape and visual impact; highways and transport; heritage; flood risk and drainage; ecology; and arboriculture. Each report comprises the essential, proportionate information to enable the proposals to be justified in principle at this plan making stage. Once the Neighbourhood Plan is made, further technical work will be carried out as part of a planning application for the whole scheme, as required by Policy STOW7.

The Exceptional Circumstances

The community has become increasingly concerned about where past trends will lead to for the town if left unaddressed. The town has become a victim of its own success as it struggles to mitigate the dominance of tourism, traffic and an increasingly older, necessarily affluent, population. It has seen no meaningful growth in its housing stock or supporting infrastructure since the 1970s, other

than two major specialist accommodation for older people schemes, which have only served to reinforce its aging population profile.

A new vision and objectives to plot a course to a different, more sustainable future, present the essence of exceptional circumstances to justify the change proposed in the AONB in the wider public interest. In that regard, putting the NP to a referendum in due course, will be the ultimate test of measuring that interest.

The TC does not dispute that the proposal is ‘major development’ and that such a change will be harmful and permanent as a matter of principle. Nor does it dispute the fact that the land exhibits the special qualities of the AONB (as set out in the CAONB Management Plan), lying on an east facing slope of the town within its wider setting that is visible in part in long views from the east. That said, the existing physical extent of the King George Field estate on that same slope, which is more clearly within the setting of the historic town in those same views, diminishes that harm in part.

For the proposal to form an allocation policy of the NP it must meet the ‘basic conditions’ in both having regard to national policy and being in general conformity with strategic development plan policy (notably Policy EN5 ‘AONB’ of the adopted Cotswold District Local Plan 2011-2031). It is therefore necessary to demonstrate that all three of the tests of NPPF §177 (to which Policy EN5 defers) are met.

Test A: The Need for the Development

The scheme would secure both market and affordable housing for which there is a need in Stow to shift its demographic profile, economic base and self-sustainability. It would boost the supply of local housing in way that has not happened in 40 years and contribute to District-wide housing supply. Crucially it will deliver almost 100 affordable homes, some of which will be restricted to local people and to remaining as primary residence. It would also increase the number of working age people to help diversify its economic base away from a significant dependence on tourism.

Test B: The Absence of Alternatives

The whole of the NP area lies within the AONB. The benefit of the NP plan-led approach is that it allows for communities to envision their future, gather local evidence and come to a planning judgement on reasonable alternatives. Since the 1970s, any housing (other than for older people), economic (other than for tourism) and social (again, other than for older people) needs of Stow have been met by other towns in the northern part of the District, or in neighbouring Districts. For the vision to be realised, of necessity these needs must be met in Stow and therefore in the AONB.

Test C: Moderating Detrimental Effects

The concept masterplanning work has shown that the site is large enough to accommodate a landscape strategy that can successfully moderate the majority of the harmful environmental effects. The arrangement of uses and design strategy will enable new landscape to permeate the scheme and to bolster the existing tree belts and hedgerows within the site and around its eastern, southern and northern boundaries. The scheme has additional environmental benefits in the form of green infrastructure and biodiversity enhancements. It would also deliver recreational benefits through new footpath links and the creation of publicly accessible areas on land that is currently private.

Summary

The TC considers that the planning balance favours its proposal as the three tests can be met and the exceptional circumstances justified in principle. It will continue to work closely with the land interest, CDC and CCB to complete an evidence base in support of the proposal for the submission of the Plan in due course.

APPENDIX F: SITE ASSESSMENTS NOTE

Introduction & Purpose

This note describes the approach that has been taken to assessing sites for potential allocation in the Neighbourhood Plan.

Background

From the outset of the project the Town Council has understood that there is no ‘top down’ driver for the Neighbourhood Plan making site allocation proposals for the plan period to 2031, either at Stow or in the Swells. In this regard, the District Council considers any ‘indicative housing figure’ (as per §67 of the NPPF) to be zero.

However, early community engagement work during 2018 and 2019 indicated that many in the town were growing concerned at the problems of traffic congestion, the dominance of tourism in the local economy, the inadequate provision of modern community facilities and worsening access to affordable housing. In response, the Town Council determined to explore options for allocating land to address these matters, recognising the significant constraints imposed by the Cotswolds AONB designation across the whole of its area.

A Two Stage Process

The work began in 2019 with the project working group carrying out a call for sites which resulted in 11 sites being identified for assessment, most for their potential to accommodate housing, or housing-led mixed use, schemes, but a couple for new public car parking only. The housing sites were assessed using a pro-forma and an indicative site capacity was provided for each site. During that exercise the group engaged with the respective land interests to ascertain likely availability and to confirm their interests.

This first stage reached a conclusion in late 2020, at which point it became clear to the working group that the only way in which the Town Council could address all of the concerns raised by the community and justify development in the AONB was to allocate a single site. The site would have to be large enough to accommodate not just market and affordable housing but also new public car parking and a community hub. It would also have to be sufficiently accessible to connect well with the town centre, especially if its car parking would enable spaces to be relocated from the Market Square.

The second stage was hindered by COVID 19 but eventually the working group focussed on liaising with the land interests of four of the sites during 2021 and 2022, with the other sites being discarded as unreasonable alternatives to pursue any further. Two (known at that time as sites 6 and 7) were controlled by the same land interest and were combined to form one larger site to the east of the town (south of Broadwell Lane). Similarly, sites known as 9 and 10 were combined to form one site south-east of the town (north of Oddington Road).

Both land interests were asked to put forward outline proposals in response to a brief provided by the working group. The brief summarised the nature and scale of the public benefits that were being sought to meet the community’s needs and to demonstrate the exceptional circumstances for major development in the AONB. In respect of the latter site, the Town Council acknowledged that similar development proposals had been made in the past and had been refused and dismissed at appeal, but it wanted to give the community the opportunity to reappraise the option in this light.

[illegible]

The land interest of the eastern land (shown above) offered a range of proposals, including an option for providing a new country park on land it also controls to the south of the site. Importantly, it acknowledged that the concept included land in its north-east quadrant that is not in the Neighbourhood Area (the Parish boundary with neighbouring Broadwell Parish runs partially through the site, shown with a blue line on the plan).

The Town Council was satisfied that the two outline proposals met the brief to an extent that they offered a fair comparison on which to seek feedback. The plans shown here were therefore part of an online and offline engagement exercise that included the publication of vision documents prepared by each interest.



Land South-East of the Town (north of Oddington Road)

The exercise was successful in the scale and nature of the feedback generated to provide the Town Council with enough confidence to proceed with its overall vision for the town in the Neighbourhood Plan and to prefer the land to the east of the town. Both schemes were able to address the affordable housing and community hub needs but the preference rested on the closer proximity of the eastern land to the town centre. The feedback indicated that the south-eastern land was simply too far from the town centre to make walking (uphill) attractive enough for car park users, and there remained a legacy from the past proposals in terms of their perceived wider landscape effects.

Assessment & Site Selection

The working group blended its community engagement feedback with the SEA assessment and concluded that the land east of the town should be allocated in the Neighbourhood Plan for a scheme of approx. 170 homes, a 150 space public car park and a community hub building – the country park idea was not considered necessary or practical for the Town Council to manage. The SEA assessment reached a similar conclusion to the community feedback in observing the same relative strengths and weaknesses of the two proposals (see Draft SEA Report published separately).

During the production of the draft Plan the working group liaised with the land interest (Bloor Homes) to provide further technical evidence covering landscape impact, highways, ecology, heritage, arboriculture and drainage. Those reports are published in the evidence base. It also liaised with the District Council, the Cotswolds AONB Conservation Board and Broadwell Parish Council to help shape the proposed allocation policy (STOW7) and to inform its statement on the exceptional circumstances justifying major development in the AONB (see Appendix E).

The final outcome of the site assessment process is Policy STOW7 of the Neighbourhood Plan.

APPENDIX G: EVIDENCE BASE

- Cotswold District Local Plan (various)
- Cotswolds (AONB) Conservation Board (various)
- Conservation Area Appraisals
- Neighbourhood Plan Working Papers (various)
- Neighbourhood Plan Strategic Environmental Assessment
- Neighbourhood Plan Housing Needs Assessment
- Land East of Stow technical reports (various)
- Gloucestershire Historic Environment Record
- Natural England Magic Map

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STOW ON THE WOLD AND THE SWELLS DESIGN CODE



DRAFT VERSION: JANUARY 2023

STOW ON THE WOLD AND THE SWELLS DESIGN CODE

DRAFT VERSION: JANUARY 2023

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STOW ON THE WOLD AND THE SWELLS DESIGN CODE

DRAFT VERSION: JANUARY 2023

1. Introduction

1.1 The Stow on the Wold and the Swells Design Code (“the Code”) integrates with the Cotswold Design Code (“the District Code”) that covers the whole of Cotswold District. It is intended that applicants for planning permission located in Stow-on-the-Wold, Lower Swell and Upper Swell must acknowledge, understand and respond to the provisions of Code as relevant to the location, nature and scale of their proposals to comply with Policy STOW11 of the Neighbourhood Plan and Local Plan Policy EN2 of the adopted Cotswold District Local Plan.

1.2 It has been derived from the Stow and Swell Community Design Statement and further character appraisal work undertaken for the Stow on the Wold and the Swells Neighbourhood Plan during 2020 – 2022. The District Code was adopted in 2018 by the local planning authority, Cotswold District Council, as Appendix D to the Local Plan. The Community Design Statement has been produced for the evidence base of the Neighbourhood Plan by the Stow on the Wold and District Civic Society.

1.3 The Code has been prepared in accordance with the National Model Design Code and its Guidance Notes published by the Government in 2021 as relevant to this area and policy context. The ease of use and effectiveness of the Code will be monitored over the Neighbourhood Plan period. Modifications will be made as necessary and to reflect any future changes to the Local Plan, the District Code and/or to national design guidance.

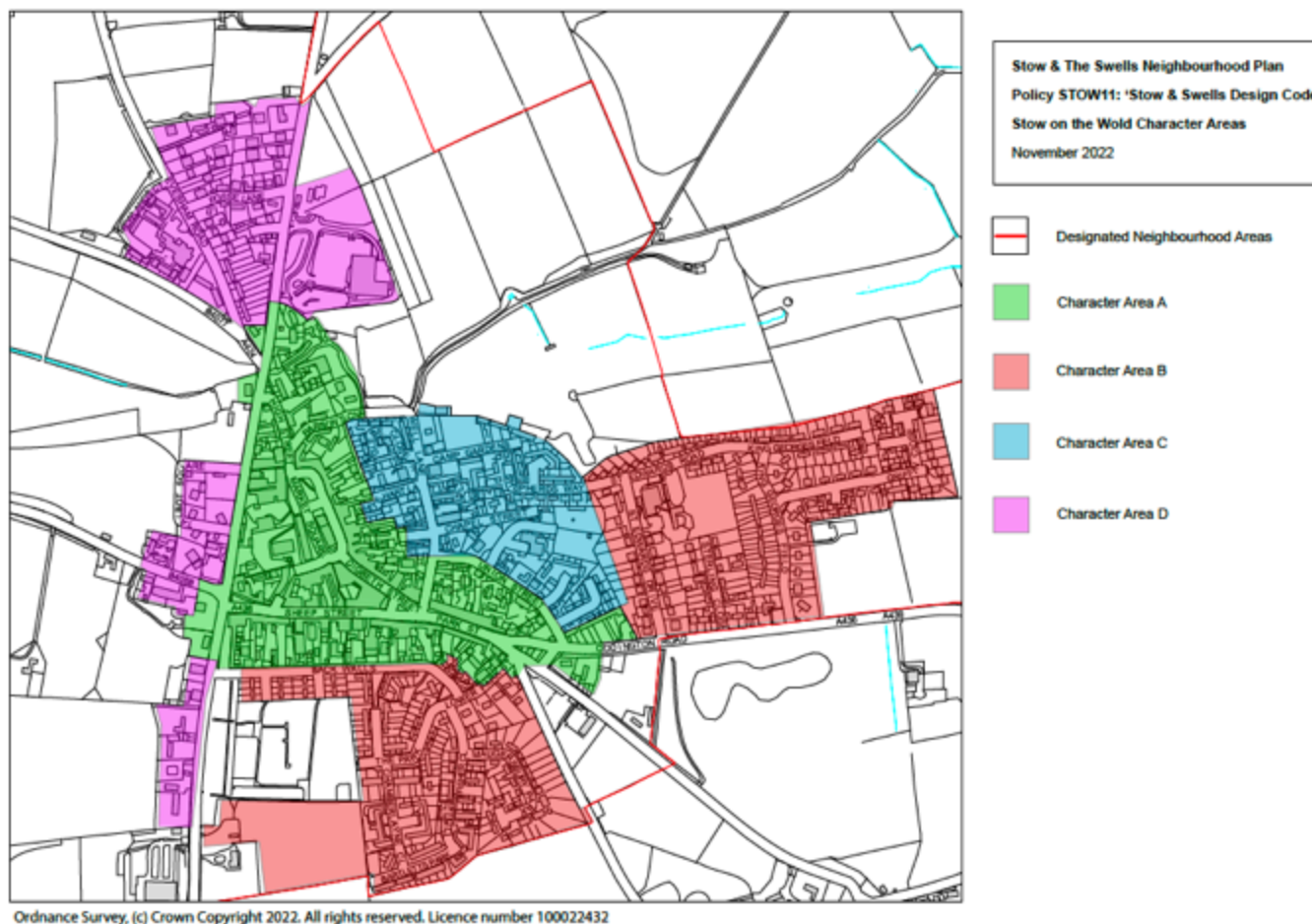
2. Understanding, Responding to and Applying the Code

2.1 The District Code sets out 67 design principles, grouped by design theme, and coded D1 – D67. Many principles are generic and apply to all development proposals in the District; some relate to the design process; and some require attention is paid to the location and design context of the proposal. This Code only relates to the location and design context of the proposal by setting out the relevant design principles for each part of the designated Neighbourhood Area.

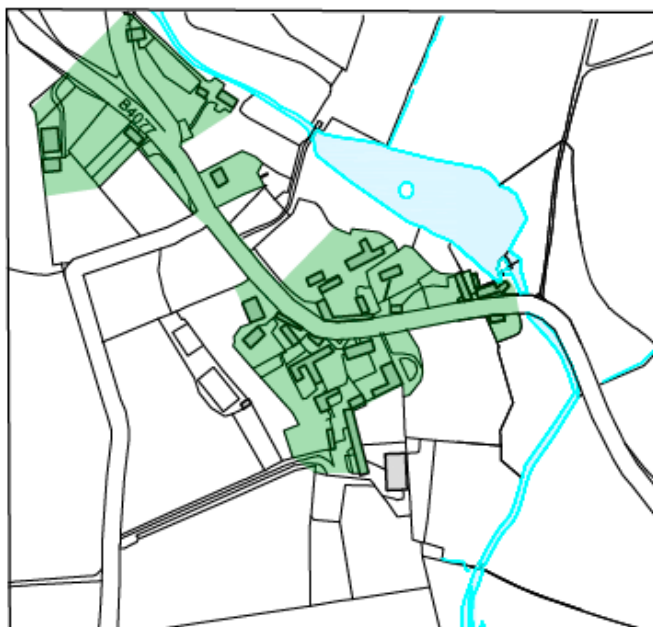
For the purpose of the Code, the designated Neighbourhood Area has been divided into six character areas:

- **Character Area A** – comprising the whole of the Stow on the Wold Conservation Area that lies within the designated Neighbourhood Area (and therefore not Maugersbury)
- **Character Area B** – comprising the southern and eastern parts of Stow on the Wold that lie east of St. Edwards Drive and north of the A436 and extends up St. Edwards Road to include Shepherds Way; and south of Back Walls and Lower Park Street that is outside the Conservation Area

- **Character Area C** – comprising that part of Stow on the Wold that lies north east of the town centre that is outside the Conservation Area at St. Edwards Drive and north of the A436 and of Union Street
- **Character Area D** – comprising the western and northern part of Stow on the Wold to the west and east of Fosse Way that is outside the Conservation Area
- **Character Area E** – comprising Lower Swell covering all of the developed area of the village including most of the designated Conservation Area
- **Character Area F** – comprising Upper Swell covering all of the developed area of the village including the designated Conservation Area



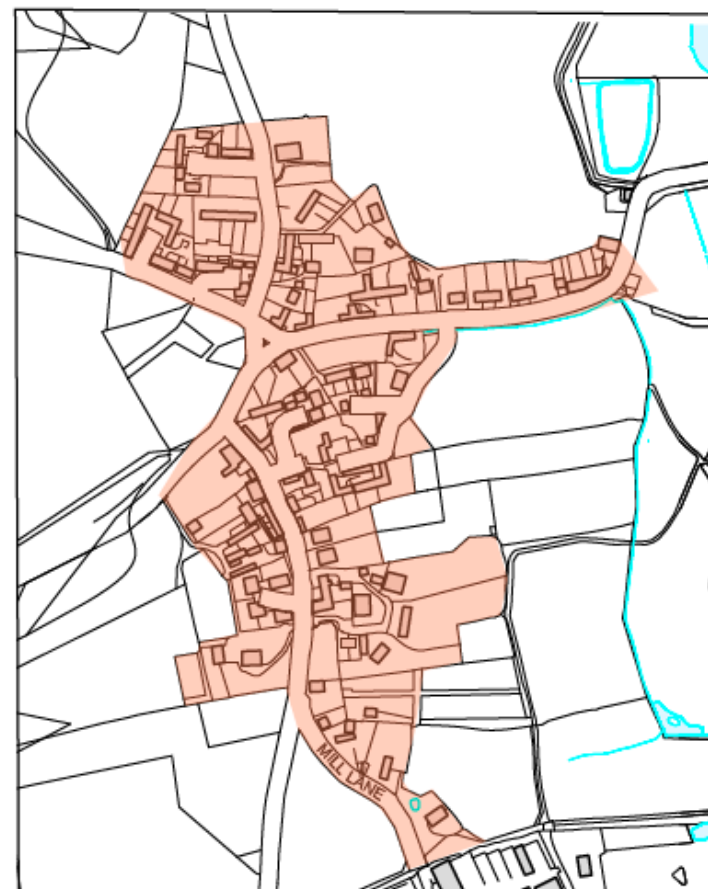
**Stow & The Swells Neighbourhood Plan:
Policy STOW11: 'Stow & The Swells Design Code'
The Swells Character Areas
November 2022**



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Upper Swell Character Area



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Lower Swell Character Area

2.3 To aid the understanding and application of the Code, it uses the same design code numbers as the District Code but with a suffix to denote in which part of the Neighbourhood Plan Area the proposal is located. Code D9A therefore relates to Character Area A (the Stow on the Wold Conservation Area) and Code D16E to Character Area E (Lower Swell). The Code quotes, in italics, the relevant District Code text for each principle for ease of reference. It then sets the **CONTEXT** and **CODING** for each part of the Code. Where a part of the District Code is not included in this Code, the District Code alone forms the guidance for development proposals. The term “historic buildings” is used throughout to denote buildings completed before the beginning of the 20th century.

2.4 Applicants preparing development proposals should be familiar with the District Code and should then relate the proposed development location to the correct part of the Neighbourhood Plan Area. The District Council will apply the generic and process principles of the District Code and the specific design principles of this Code as relevant to the location and nature of the proposal. The Town and Parish Councils will use both of the Codes to inform their judgement of proposals in making their representations to the District Council when it is consulted on planning applications.

2.5 As with all design guidance, the principles should be regarded as setting the design brief for a proposal but the applicant may depart from the Code where it can be justified in the circumstances. Given the designated heritage asset (Conservation Area) status of much of the built-up area of Stow on the Wold and the two Swells villages, and the wealth of listed buildings in the Neighbourhood Plan Area, there will be a greater emphasis on the conservation of their special historic and architectural significance, although the Codes allow for appropriate innovation in some parts of the Area. In all cases, the onus will be on the applicant to demonstrate that the Codes have been acknowledged, understood and responded to in a way that is appropriate to the location and nature of the proposal.

2.6 Throughout the Code, we have provided photographs to illustrate the guidance. In addition, Appendix 1 sets out a schedule and photographs of important views that have been identified, together with a plan indicating the position of importance views and includes comments from the community about the views that they hold dear. It is hoped that the combination of plans, photographs and the voice of the community will bring the Area and this guidance to life for potential developers.

CODE NO.	CHARACTER AREA A: STOW ON THE WOLD: CONSERVATION AREA
	LANDSCAPE, SETTLEMENTS AND STREETS
D9A 10A	<p><i>“Each site will have its own characteristics and a specific landscape setting.”</i></p> <p><i>“Settlements are distinctive in how they sit within the landscape ... they have their own unique layouts and patterns of streets.”</i></p> <p>CONTEXT: Stow-on-the-Wold (Stow) is unique in the High Wold landscape character area of the Cotswolds in being a hill-top town (‘Local Distinctiveness & Landscape Change’, Cotswold AONB, 2003). It has developed where it is, being at the junction of the Jurassic Way, the Salt Way and the Roman Fosse Way. These original ancient tracks followed the high ground and enabled the carrying of goods for long distances so that eventually Stow became a convenient trading centre, as it still is today. The Conservation Area covers the historic core of the town and is one of the most special historic areas in England. Its medieval town plan was laid out by the Abbey of Evesham in the 13th century “to exploit its considerable commercial possibilities in the middle of the wool-producing Cotswolds” (The Buildings of England Pevsner Architectural Guide – Gloucestershire 1: The Cotswolds, Verey and Brooks, 1999).</p> 

From its early medieval roots, Stow has grown around its Market Square on top of the hill, which itself is to the south west of an Iron Age settlement, and then grew down the sides of the Wolds to the east and to the north and south along the plateau area beside the Fosse Way. The Conservation Area is centred on the Market Square and the rooftops and taller buildings are visible from the wider landscape. It also has a sequence of smaller roads and alleyways (or 'Tures') radiating from its centre as passageways for animals, people and vehicles. The Fosse Way and Sheep Street form part of the wider road network, bypassing the Square to carry traffic around the edge of the Conservation Area. The western slopes facing Swell are relatively undisturbed by development other than on the horizon in most views from public vantage points. The eastern slopes are gentler but with considerable encroachment by development down the slope (St. Edwards Road etc.).



CODING All development proposals must therefore show they have understood the grain and evolution of the Conservation Area in their building form and orientation, their layout and their relationship with the street, lane, alleyway and/or yard, to the extent that is relevant to the nature and scape of the proposal.

D11A *“Cotswolds Towns typically have many buildings tightly arranged at their core, with building lines set immediately on, or close to, the rear of the pavement. Many feature gently curving streets, and are centred on wide thoroughfares or marketplaces. Nearly all settlements incorporate important open spaces ...”*

CONTEXT: Stow retains its essential character as a small, rural hill-top town, with its historic buildings clustered around the Market Square and surrounding streets. This effect of clustering is formed by all the buildings in the Market Square, Church Street, Sheep Street, Digbeth Street and Wraggs Row and High Street (from Parsons Corner to Market Square), being terraced (of a wide variety of plot widths and depths, occasionally based on original burgage plots) with only a very occasional gap to allow for rear yard access (in some cases, a former entrance for coaching inns).



The buildings face directly onto the Square and roads and their building lines are set immediately on, or very close to, the back of the pavement. The streetscape character is enhanced by gently curving streets – High Street, Church Street, Digbeth Street and Sheep Street – that lead to the Market Square, views through which are more dramatic with the framing of the Town Hall in its centre. Almost all the streets in the Conservation Area have a narrow profile of 5m – 8m. Even in the rare absence of buildings at the street edge, tall boundary walls maintain the tight profile (e.g. The Walls, Old Forge Lane).

	<p>The Market Square is one of the finest historic urban spaces in England, its significance considerably enhanced by the variety of active, ground floor, commercial uses, many with surviving traditional shopfronts and signage. A sequence of lower order, well-defined (but equally as traffic dominated) spaces are found at High Street/Parson's Corner, Digbeth Street/Sheep St, Fosse Way/Sheep Street and Fosse Way/High Street.</p> <p>Beyond those streets and spaces, the shape, size and orientation of plots and the location of buildings within the plot is more haphazard. In most cases, they will be formed by the rear of the (former burgrave) plots fronting those spaces with some civic, hotel and farm buildings – for example, Stow Lodge, Fosseway Farm Cottage – sitting in their own plots with a series of larger and ancillary buildings. All development proposals must retain these essential building and plot form characteristics.</p> <p>CODING All development proposals must retain these essential building and plot form characteristics.</p>
D12A D13A	<p><i>"..... An understanding of key views is critical."</i></p> <p><i>"Traditional Cotswold streetscenes contain buildings of a variety of scales and architectural styles. Together, however, there is a sense of rhythm, harmony and balance, and this should be continued in any new development. The particular character of existing streets should be respected, including gaps between buildings, which can often be important. New additions might add interest but should not appear out-of-keeping."</i></p> <p>CONTEXT: The following are considered key views:</p> <p>View west from various points along Fosse Way, Monarchs Way and Lower Swell Road across agricultural fields and pasture to Lower Swell and to the surrounding and distant Wolds</p> <ul style="list-style-type: none"> • Views of the church tower from the south east • View west and south west from the Queen Elizabeth II playing field and Evesham Road across agricultural fields and pasture to the Swells and the grounds of Abbotswood • View east from Stow Primary School, King Georges Field, St. Edwards Road and Griffin Close across agricultural and open fields to the distant Wolds • View east and south from Fosse Way House, a seventeenth century house with a grand Victorian extension across open fields • View from Well Lane south and south-east across the steep valley, above which sat the Iron Age Settlement • View south and west from various points along the public path to Mangersbury and within Mangersbury Park and Bartletts Park across agricultural fields and pasture

- Views across the Market Square in all directions
- Views along, Digbeth Street, Church Street, Church Walk, High Street, Union Street, Camp Gardens, Shepherds Row, Chapel Street, Sheep Street, Park Street, Back Walls, Fleece Alley and other Tures/alleyways and into historic yards off Sheep Street and the Market Square
- View from the top of Digbeth Street towards Mangersbury across the fields in the distance



The incidence of glimpse views from one space to another is also a distinct feature, for example of the few tall features in the Conservation Area (the church tower, the cupola of the Old School House) or more subtly of smaller spaces and courtyards. The Conservation Area has seen considerable infill development to the rear of the burgage plots radiating from the Market Square and along the secondary streets. The majority of these schemes have fitted in to the grain of the Area well, in places closing or partially closing unimportant gaps; in others retaining and enhancing gaps and creating new, interesting spaces. Views which reflect the rural heritage within the Conservation Area are importance such as along tures/alleyways (former sheep drives) and into former agricultural yards. All proposals for new additions must demonstrate how they will fit within the streetscene from every relevant direction.

CODING: The location and orientation of new buildings in the plot should reinforce and not obstruct, disrupt or weaken the framing of a key view or of a glimpse view.

SCALE AND PROPORTION

D16A
D17A

“New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context.”

“Excessive or uncharacteristic bulk should be avoided. New buildings should generally not dominate their surroundings but should complement the existing structures and landscape and sit comfortably within their setting.”

CONTEXT: The Cotswold vernacular is light and subtle in building height and massing and in site prominence. In the Conservation Area only the Town Hall in the Market Square dominates the space, with St Edwards Parish Church set well behind the Square and Fosseway.

CODING Proposals for taller or bulkier buildings, whether at prominent locations in the streetscene or not, are not suitable in the Conservation Area.



D18A	<p><i>“The height of new buildings should respond to the local context, for example forming a gentle transition from open countryside to settlement edge.”</i></p> <p>CONTEXT: The taller three storey buildings are found in the Market Square only. Elsewhere buildings may be two or two and a half storey in height. There are some occasional low cottages of one and a half or two storeys.</p> <div data-bbox="344 333 960 903" data-label="Image"> </div> <div data-bbox="981 333 1921 903" data-label="Image"> </div> <p>CODING Buildings should be no more than two storeys in height unless replacing a three storey or infilling a site adjoining one or more three storey buildings, in which case they may also be three storeys in height.</p>
ARCHITECTURAL STYLE: COTSWOLD VERNACULAR	
D21A	<p><i>“Many Cotswold settlements are quintessential English ... The distinctive traditional architecture of the area is famous worldwide. Buildings have, for many centuries, had a relatively uniform and consistent style, resulting from the use of the local stone and traditional construction techniques. This is known as the Cotswold vernacular.”</i></p> <p>CONTEXT: The Conservation Area is one of the strongest and most consistent examples of the Cotswold vernacular in the whole of the AONB. Its over-riding feature is in the use of the honey and golden coloured oolitic Jurassic limestone as the primary building material. The Stow Conservation Area has grown over several hundreds of years. As a consequence, the architectural style of historic buildings varies according to the period of construction and the type of building, whether grand houses or</p>

workers' cottages. Even within such categories there are variations in design, for example of windows, architectural features, roof lines and entrances, with adjacent properties having very different styles, but with a pleasing coherence provided by the Cotswold vernacular. An especially helpful example is Wraggs Row, where each of the old cottages has its own character through original design and evolution of the dwellings.



CODING All development proposals should demonstrate an understanding of how such variations in design, emulating these historic variations, can be used to add to the architectural value of the proposed development, extension or alteration.

D25A *"Some key qualities of the Cotswold vernacular are...."*


CONTEXT: The Conservation Area is a classic example of the use of the Cotswold vernacular, which is found on all buildings pre-dating the 20th Century and the majority of those that are newer.




CODING With the very strong and consistent Cotswold vernacular a fundamental element of the very special historic and architectural significance of the Conservation Area and the setting of its many Listed Buildings and other heritage assets, it is vital that all proposals for the extension or replacement of existing buildings or for infill schemes:

- Are of a simplicity of form and design of an understated appearance, with any ornamentation usually limited to architectural features
- Have a plot width to the frontage that maintains the variety of rhythm of those widths
- Have steep roof pitches of only open gable or cross gable, single ridge roof forms and not of hipped, half hipped or other roof forms, with the roof either unbroken or with dormers set well within the roof slope above the eaves
- Have roof valleys formed by only stone slates swept to a curve with plain shallow eaves and verges and no overhangs, exposed rafter feet, fascias or bargeboards
- Have chimneys set to the ridge line, with stacks integral and flush to gable end walls
- Have window openings that are well spaced and fairly small, with sizeable areas of wall in between; openings usually centrally placed within gables, and end walls containing chimneys usually blank, or with sparse and offset fenestration.
- Have two and three light windows, with a clear hierarchy to the openings of wider ground floor windows below smaller upper floor windows.

	<ul style="list-style-type: none"> • Have either stone mullion window surrounds, directly glazed or containing metal casements, and sometimes with stone hood moulds above or have simple flush timber casements, with slender glazing divisions, set below stone or timber lintels • Have doors that are solid timber boarded and, for commercial premises have up to 40% of the total door area as glass • Avoid front porches, which are not a feature of the Conservation Area • Garden areas enclosed by only dry stone walling
D26A	<p><i>"From the eighteenth century, a larger number of buildings were constructed showing the influences of classical architecture ..."</i></p> <p>CONTEXT: There are few examples of classical architecture in the Conservation Area. Those buildings that have used this style are of commercial or civic importance and have retained a vernacular flavour.</p> <p>CODING The classical style is therefore not a building style that is suitable in the Conservation Area.</p>
D27A	<p><i>"A distinctive interpretation of the Cotswold vernacular continued through the Victorian period...."</i></p> <p>CONTEXT: St. Edward's Hall at the centre of the Market Square is a rare example of Victorian Gothic style. Whilst the building is a hub for the community, its design is idiosyncratic when compared with the rest of the Market Square.</p> <p>CODING The Victorian Gothic style is therefore not a building style that is suitable in the Conservation Area.</p>
D28A	<p><i>"The Cotswold vernacular is also renowned for its relationship with the Arts and Crafts movement"</i></p> <p>CONTEXT: There are no examples of Arts and Crafts style buildings in the Conservation Area.</p> <p>CODING It is not therefore a building style that is suitable in the Conservation Area.</p>
ARCHITECTURAL STYLE: CONTEMPORARY	
D22A D30A	<p><i>"Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition ... The decision whether to adopt a vernacular or more contemporary architectural style will depend upon the type of development, the site and its setting ... On many listed buildings, in some prominent locations ... a contemporary building may appear too starkly out of keeping...."</i></p>

	<p>CONTEXT: There are no examples of contemporary buildings styles of note in the Conservation Area.</p> <p>CODING Its very strong adherence to the Cotswold vernacular means that the Conservation Area is not generally a suitable location for contemporary design solutions for replacement or infill buildings, structures, boundary treatments or external lighting. However, a contemporary solution may be in keeping with the dominant vernacular in locations that are not very prominent in the streetscene, i.e. the building will not lie at or close to the back of pavement nor will punctuate or terminate a view through the Conservation Area. A good example is that of Nursery End Cottage on Union Street. The modern requirements for refuse collection should be met within the fabric of the building.</p>
<p>MATERIALS AND CRAFTMANSHIP</p>	
D36A	<p><i>“The colour of Cotswold Stone varies across the District ... and rich honey colours in the North.....”</i></p> <p>CONTEXT: There is some variation in the colour of Cotswold stone used in historic buildings and from the same material source. This variation adds to the distinct and special character of the Conservation Area.</p>  <p>CODING New buildings should be constructed using a colour of Cotswold Stone already present on one or more Listed Buildings in the Conservation Area. The colour of Cotswold stone used for external alterations and extensions, including new or replacement external walls and roofs, should match the colour of the main building.</p>

D37A D38A D39A	<p><i>“There are various styles of walling stone within the Cotswolds. Many higher status buildings are constructed in ashlar stonework. This consists of straight cut, finely tooled blocks of stone, laid to their natural bed, with very tight mortar joints.”</i></p> <p><i>“More commonly walls are constructed of Cotswold Rubble stone ... Many buildings are built up in rougher less worked rubble stone....” Mortars are traditionally lime based....”</i></p> <p>CONTEXT: Both Ashlar dressed Cotswold Stone and rougher ‘rubble’ stone are present in the Conservation Area. For many of the grander buildings, dressed stone predominates. Some historic buildings use both types of stone.</p> <p>CODING For new buildings, either of these stone types is suitable. For external alterations and extensions, the type of walling stone should match the main building. All walls should be laid, and lime mortared to match the main building.</p>
D41A	<p><i>“Many Cotswold vernacular buildings were rendered historically....”</i></p> <p>CONTEXT: Although there has been some rendering of walls in the Conservation Area, this does not sit well with the historic Cotswold vernacular.</p> <p>CODING Roughcast or other rendering and lime washing are therefore not appropriate finishes for the Conservation Area.</p>
D42A	<p><i>“Other traditional building materials also make an important contribution to local character. Some red brick is seen ...”</i></p> <p>CONTEXT: The use of red brick is rare in the Conservation Area and only associated with peripheral, more modern buildings or building extensions.</p> <p>CODING It is not therefore a material that is suitable for any type of building or structure, including extensions or alterations, in the Conservation Area.</p>
D45A	<p><i>“From the nineteenth century onwards there is more use of blue-grey Welsh slate, for re-roofing”</i></p> <p>CONTEXT: The use of Welsh slate is rare in the Conservation Area and only associated with peripheral, more modern buildings or building extensions.</p> <p>CODING Roofs of Listed Buildings should be repaired and replaced with local Cotswold stone tiles, where that is the material used in the original building. There should be no replacement of original stone tiles with artificial stone tiles or blue slate. Blue</p>

	slate is only acceptable on outbuildings and extensions to Listed Buildings on which it is already present. Roofs of modern buildings should be repaired or replaced with Cotswold Stone tiles.
D46A	<p><i>“Some use of thatch is also seen in the District ... Plain clay tile is seen in some locations and clay pantiles ...”</i></p> <p>CONTEXT: Thatch is not used as roofing material in any part of the Conservation Area. There is no tradition of use of clay tiles or pantiles or wall hanging with tiles in the Conservation Area.</p> <p>CODING The use of thatch, clay tiles, reconstituted stone and synthetic materials is not appropriate in the Conservation Area.</p>
D50A	<p><i>“Even the choice of finishes can make a vast difference to the character and appearance of buildings, such as window and door paint colours ... Colours should normally be selected from a fairly traditional palette....”</i></p> <p>CONTEXT: Almost all historic buildings, including shopfronts, share a palette of polite colours for the painting of their windows and doors in the Conservation Area, which complement the subtle tones of the Cotswold Stone of buildings.</p> <p>CODING The use of primary and other, non-polite colours for painting timber is not appropriate in the Conservation Area.</p>
D55A	<p><i>“There are also examples of red brick walls and other boundary treatments....”</i></p> <p>CONTEXT: Boundaries are normally marked with Cotswold Stone walls in the Conservation Area.</p> 

	<p>CODING New or replacement boundaries to properties within the Conservation Area should be of Cotswold stone construction. Existing traditional Cotswold stone walls, and native hedgerows should be preserved, and appropriately maintained and managed, both during and after construction.</p>
D57A	<p><i>“Paving is traditionally limestone or Yorkshire flags. Stone cobbles, blue engineering bricks and other traditional setts are commonly seen. And crushed limestone or bound gravel can also be sympathetic surface finishes.”</i></p> <p>CONTEXT: Parts of the Conservation Area have retained limestone flags as a paving material; the remainder comprises a mix of modern materials.</p> <p>CODING Any new or refurbished paving should use the same traditional material as that of any existing traditional paving of the building(s) concerned or adjacent to it. Where such paving is no longer manufactured, the materials should be as near as possible the same character.</p>
SUSTAINABLE DESIGN	
D62A	<p><i>” Sustainable design needs to be responsive to the character of the area and the sensitivities of the site ...”</i></p> <p>CONTEXT: The strength of the character of the Conservation Area is such that contemporary architectural features are very likely to detract from that character. As future planning policy requirements are expected to significantly improve the carbon performance of all buildings, it is vital that the location and form of additions to buildings that require planning permission are handled very sensitively.</p> <p>CODING All proposals of this type must demonstrate that they have avoided or minimised any harmful effects on the Conservation Area of the technical options available.</p>
KEY DESIGN CONSIDERATIONS	
D67A	<p><i>“Sympathetic signage section - Lighting of signage should be avoided.....”</i></p> <p>CONTEXT: There are a wide range of shop fronts in the Conservation Area of varying design quality in terms of their individual and collective contribution to its special character. The colour of paint used has as much impact as the design of the shop front.</p> <p>CODING External lighting, including of shop signs within the Conservation Area should be appropriate for the historic and AONB environment. Development proposals relating to shop fronts, even if relatively minor, should consider the Market</p>

	Square and the adjacent streets and seek to emulate shop fronts which blend well with the building of which they are part and attached buildings. Timber is expected to be painted using a muted palette which does not detract from the surrounding stone. Lighting of signage in the Conservation Area should be avoided.
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CODE NO.	CHARACTER AREA B: STOW ON THE WOLD: SOUTH AND EAST
LANDSCAPE, SETTLEMENTS AND STREETS	
D9B D10B	<p data-bbox="293 264 1279 296"><i>“Each site will have its own characteristics and a specific landscape setting.”</i></p> <p data-bbox="293 304 1205 336"><i>“Settlements ... have their own unique layouts and patterns of streets.”</i></p> <p data-bbox="293 384 2004 571">CONTEXT The Character Area covers two similar, exclusively residential, areas of the town beyond its historic core though of different dates. Firstly, there is the area east of the historic core of the town, comprising St Edwards Road, St Edwards Drive, King George’s Field, Griffin Close, Sterling Close and Oddington Road (A436) laid out in the 1960s and 1980s with some later infill. Secondly, there is the area south of the historic core comprising the planned Park Estate built in 1951 as the first major expansion of the town for centuries and the Mangersbury Park estate of the 1970s.</p> <div data-bbox="304 616 1102 1121">  </div> <div data-bbox="1115 616 1998 1121">  </div> <p data-bbox="293 1166 2004 1353">Both parts comprise strong and common suburban characteristics of their respective ages, making them very distinct from their neighbouring areas, most notably the Conservation Area, with which they share very few characteristics. The St. Edwards Road area occupies a prominent position in the landscape as it extends down the gradual hill slope from the historic core eastwards. It is especially exposed in the landscape from public vantage points near and at the entrance to the town from the A436 to its south and east and is visible in much longer views towards the town and hillside from the south east in places like Kingham.</p>

	<p>Its prominence is partially accentuated by all of the roads being laid out against the contour lines. With little in the way of tall, mature tree lines or hedges, much of the boundary of the area offers a hard edge of buildings to the surrounding landscape.</p> <p>The Park Estate lies on the narrow plateau along the hill top and is enclosed from the wider landscape by the Mangersbury Park Estate other than at Bartletts Park, where it is exposed at the top of the steep southern slope to the hill top ridge. This same edge is exposed at Mangersbury Park and in both cases it has a hard edge to the slope with little in the way of mature landscape to soften the building line.</p> <p>All of the roads in the St Edwards Road part are laid out primarily in straight sections with slight curves. Together with the gentle slope, this creates an undulation of nearness and distance and therefore a sense of delight in the streetscene. Sterling Close and St Edwards Drive are entirely straight and, with no punctuation along their lengths or features to terminate or frame their ends, they offer little delight in their layout. The Park/Mangersbury estates have layouts with a combination of long straight sections, gentle and tight curves and cul-de-sacs with no over-riding character.</p> <p>CODING All development proposals must therefore show they have understood the grain and evolution of the Conservation Area in their building form and orientation, their layout and their relationship with the street, lane, alleyway and/or yard, to the extent that is relevant to the nature and scape of the proposal.</p>
D12B	<p><i>“..... An understanding of key views is critical.”</i></p> <p>CONTEXT: The following are considered key views:</p> <ul style="list-style-type: none"> • View east from Stow Primary School, King Georges Field, St. Edwards Road and Griffin Close across agricultural and open fields to the distant Wolds • View south from various points along Oddington Road towards Mangersbury • View from the top of Digbeth Street towards Mangersbury across the fields in the distance • View across the allotments and cemetery from The Park towards the Fosse Way <p>The incidence of glimpse views is also a distinct feature between the buildings on the south side of Mangersbury Park, Bartletts Park and Beechwood Park southwards towards Mangersbury Hill and between the buildings on the north side of King George’s Field northwards towards Broadwell Hill.</p>

CODING: The location and orientation of new buildings in the plot should reinforce and not obstruct, disrupt or weaken the framing of a key view or of a glimpse view.



D13B *“... there is a sense of rhythm, harmony and balance, and this should be continued in any new development. The particular character of existing streets should be respected, including gaps between buildings, which can often be important.*

CONTEXT: The roads have common plot arrangements with little variation in shapes and sizes, aside from King George’s Field, which has three distinct plot arrangements on its northern cross-section and its southern cross-section. The area has an average density of 20 – 25 dwellings per Ha.



CODING There is generally insufficient plot width or depth to accommodate new dwellings either in the rear or to the side of existing buildings; only on parts of St Edwards Drive and Lower Park Street are plots large enough to allow for sub-division in this way. There is therefore some scope within each road for plot variation in plot redevelopment or infill proposals, or in proposals to extend the area, as follows:

Road	Plot Width (m)	Plot Depth (m)	Building Line (m)	Road Profile (m)
St Edwards Road	17-18	25-40	6-11	20
St Edwards Drive	15-20	30-40	6-8	25
Sterling Close	10-15	42-50	5-13	20-30
King George's Field	6-7 (west) 7-12 (east)	25-30 (north) 50-55 (west) 35-40 (east)	5 (north) 21 (west) 9 (east)	20 (north) 45-50 (east-west)
Griffin Close	8-14	20-45	5-10	20-30
Oddington Road	10-12	35	13-14	-
The Park	9	30	9	20-25
Back Walls	10	35	14	35
Fisher Close	8	22-24	4	20
Maugersbury Park	5-10	33-50	5	20
Bartletts Park	6	20-25	6	20
Chamberlayne Close	Either blocks of flats or of bungalows			
Lower Park Street	20	40	15	25

SCALE AND PROPORTION


D16B
&
D18B

"New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context ... The height of new buildings should respond to the local context ..."


CONTEXT: the roads have common building forms arrangements with little variation in shapes and sizes, aside from King George's Field, which has three distinct plot arrangements on its northern cross-section and its southern cross-section as follows:

Road	Dominant Building Form	Dominant Roof Forms
St Edwards Road	Two storey semi-detached and detached chalet bungalows.	Steep gable pitched roof with chimneys
St Edwards Drive	Wide, detached chalet bungalows	Steep gable pitched roof with chimneys
Sterling Close	Medium height, two storey semi-detached or chalet bungalows	Gable pitched roof with chimneys
King George's Field	Taller, two storey semi-detached	Gable pitched roof with chimneys
Griffin Close	Medium height, two storey variety	Gable pitched roof with chimneys
Oddington Road	Taller, two storey semi-detached	Gable pitched roof with chimneys
The Park	Lower, two storey semi-detached and double fronted	Gable pitched roof and central chimney
Back Walls	Taller, two storey semi-detached	Gable pitched roof with central chimney
Fisher Close	Medium height, two storey semi-detached or blocks	Gable pitched roof with no chimneys
Maugersbury Park	Taller, two storey semi-detached and detached chalet bungalows	Steep gable pitched roof with chimney
Bartletts Park	Medium height, two storey blocks	Gable pitched roof with chimney
Chamberlayne Close	Tall, two storey blocks of flats (west) Single block of bungalows (east)	Tall, gable pitched roof with no chimneys (west) Low gable pitched roof with occasional chimneys (east)
Lower Park Street	Wide, detached chalet bungalows	Steep, gable pitched roof with chimneys

CODING In each road, with the exception of Chamberlayne Close, there is scope for extending buildings to the rear and by increasing their height to 2.5 storeys to accommodate additional rooms, provided the gable pitched roof form is used. However, the dominance of detached and semi-detached buildings in the area results in many glimpse views between the buildings to the countryside beyond. This contributes to their distinct character in being a modern part of an historic town in a Cotswold setting and, where such a view exists, it will not be appropriate to extend buildings on their side elevations. At Chamberlayne Close, the blocks of flats and bungalows form a comprehensive planned layout and only the redevelopment of one or both blocks, replacing them with the dominant semi-detached and detached forms, will be appropriate.

	ARCHITECTURAL STYLE: COTSWOLD VERNACULAR
D22B D25B	<p><i>“Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition ... The decision whether to adopt a vernacular or more contemporary architectural style will depend upon the type of development, the site and its setting ...”</i></p> <p>CONTEXT: There is no common use of the Cotswold vernacular in the area other than at The Park estate. Its infill and redevelopment schemes that have used the vernacular in recent years appear incongruous with their surroundings (as though part of the Conservation Area and its setting) rather than fitting into the modern, suburban character.</p> <p>The Park estate (for the former North Cotswold Rural District Council by renowned Oxford architect Thomas Rayson) is distinct in being the only example of a development scheme of the town’s mid 20th Century expansion that strongly reflects the Cotswold vernacular without being pastiche. The scheme comprises a wonderful mix of primarily terraced two storey blocks in stone set in generous, well laid out front gardens behind street trees and verges. As such it should be an inspiration for any new development proposal in any Character Area of the town that is more than a small infill scheme.</p>  <p>CODING Proposals need not therefore adopt the Cotswold vernacular style other than in their domestic scale and form, and instead use materials common to the area.</p>

	MATERIALS AND CRAFTMANSHIP
D54B	<p><i>“There are also examples of red brick walls and other boundary treatments ...”</i></p> <p>CONTEXT: The area contains examples of many modern boundary treatments such as low stone walls and hedges.</p> <p>CODING The use of red brick for walls and boundary treatments is appropriate other than in the Parks estate area.</p>
	GREEN INFRASTRUCTURE
D66B	<p><i>High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments.....“</i></p> <p>CONTEXT: All of the area is characterised by front gardens with trees, and hedges forming the front, side and rear boundaries to the plot, with grass verges also common. Although far from ‘arcadian’ (other than at The Park estate), combined with generally wide road profiles, they contribute to the overall polite suburban appearance, as distinct from the historic core.</p> <p>CODING Proposals must include landscaping schemes that make provision for generous front and rear plot planting for boundary treatment.</p>

CODE NO.	<p>CHARACTER AREA C: STOW ON THE WOLD: NW EDGE OF TOWN CENTRE</p> <p>LANDSCAPE, SETTLEMENTS AND STREETS</p>
D9C	<p><i>"Each site will have its own characteristics and a specific landscape setting."</i></p> <p>CONTEXT: The Character Area sits on the site of the Iron Age Settlement of Mythelgeris Byrig and abuts the Conservation Area. The south side of Union Street is in the Conservation Area. It forms an important transition between the Conservation Area and the suburban characteristics of the eastern part Character Area B. It includes some historic buildings along the north side of Union Street and Well Lane including Chapel Street and Camp Gardens. The Sub-area includes listed buildings at Shepherds Row and the Bottle Kiln at Chapel Street. There are modern housing developments on the north side of Union Street and at Mount Pleasant Close, Condurrow Court and more Eastview Close. The northern boundary of the sub-area backs onto open countryside and includes an important view across the steeply sloping valley to the south-east of Well Lane. The Fire Station and Tower on Union Street is an example of rather brutal design that detract from this area.</p> <p>CODING New dwellings should therefore not be built within the gardens of historic houses and cottages.</p> 

D10C *"Settlements are distinctive in how they sit within the landscape ... they have their own unique layouts and patterns of streets".*

CONTEXT: The Character Area mainly consists of narrow streets, similar to those in the Conservation Area. Well Lane follows the contour of the hill in an approximately north-south alignment. The three older passageways of Camp Gardens, Shepherds Row and Chapel Street and the Clifton Close/Well Lane end of Union Street are approximately aligned east/west, each in a relatively straight line running down the gentle upper slope of the hill. Union Street curves to the south east at the Fire Station and then to the south-south east to meet Park Street (the A436). Many of the historic properties have no off-street parking which presents challenges due to the narrow streets. Modern housing has been developed to the north and north-east of Union Street with each development retaining narrow streets aligned to the north east. Some of the more recent developments demonstrate sensitivity to the adjacent Conservation Area through design and materials.



CODING Proposals should respect the traditional layout and not create difficulties for vehicles manoeuvring in the narrow streets, with off-street parking and concealed off-street recycling and refuse storage with easy access for collection in order to avoid cluttering the narrow streets. Proposals for alterations or extensions to existing properties should retain existing off-street parking.

D11C	<p><i>“Cotswolds Towns typically have many buildings tightly arranged at their core, with building lines set immediately on, or close to, the rear of the pavement. Many feature gently curving streets, and are centred on wide thoroughfares or market places. Nearly all settlements incorporate important open spaces. Some Cotswold Villages are arranged around village greens. Others are set out in linear fashion or are more dispersed.”</i></p> <p>CONTEXT: As would be expected in this transitional area the buildings display a number of different forms. The Stow Social Club on Well Lane is a large building adjacent to the modest cottages at the end of Camp Gardens. To the north and north-east of Union Street and in Mount Pleasant Close are a small number of detached dwellings, with larger plot sizes. The majority of the remaining dwellings, whether historic or modern are terraced, for example in Landgate Yard. The historic terraced properties sit immediately on the pavement while most modern terraced properties have an area between the house and the street, some with parking space. To the west of Well Lane and abutting the Conservation Area is a small area of modern dwellings in Glebe Close, which consists of detached, semi-detached and terraced dwellings with smaller plots.</p> <p>CODING All development proposals must therefore show they have understood the grain of the Character Area, especially in those locations that form the setting of the Conservation Area, in their building form and orientation, their layout and their relationship with the street, to the extent that is relevant to the nature and scape of the proposal.</p>
D12C	<p><i>“..... An understanding of key views is critical.”</i></p> <p>CONTEXT: The following are considered key views:</p> <ul style="list-style-type: none"> • View west from various points along Fosse Way, Monarchs Way and Lower Swell Road across agricultural fields and pasture to Lower Swell and to the surrounding and distant Wolds • Views of the church tower from Chapel Street <p>CODING: The location and orientation of new buildings in the plot should reinforce and not obstruct, disrupt or weaken the framing of a key view.</p>

SCALE AND PROPORTION	
D16C	<p><i>“New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context.”</i></p> <p>CONTEXT: The existing dwellings in the sub-area, whether historic or modern, are of human scale and do not dominate the experience of passing pedestrians or other buildings.</p> <p>CODING New buildings should be of a density which reflects the character of the immediate locality. Development proposals for new dwellings which demonstrate creativity in providing adaptive homes that can change with the needs of residents over time while not increasing the overall height, mass and scale, are encouraged.</p>
D18C	<p><i>The height of new buildings should respond to the local context, for example forming a gentle transition from open countryside to settlement edge.”</i></p> <p>CONTEXT: Buildings in this sub-area, whether historic or modern are generally of a modest two storey height and bulk, and no more than two and a half storeys, the exception being the fire station tower.</p> <p>CODING The height, mass and scale of any proposed development should not dominate buildings within or adjacent to the area and should be no more than two or, exceptionally, two and a half storeys.</p>
ARCHITECTURAL STYLE: COTSWOLD VERNACULAR	
D25C	<p><i>“Some key qualities of the Cotswold vernacular are....”</i></p> <p>CONTEXT: The use of the Cotswold vernacular is very common in the Character Area, which is found on all buildings pre-dating the 20th Century and the majority of those that are newer.</p> <p>CODING Buildings are mostly built of Cotswold Stone, particularly historic buildings, or of modern materials which replicate Cotswold Stone. For historic buildings, it is vital that all proposals for the extension or replacement of existing buildings or for infill schemes:</p> <ul style="list-style-type: none"> • Are of a simplicity of form and design of an understated appearance, with any ornamentation usually limited to architectural features • Have a plot width to the frontage that maintains the variety of rhythm of those widths • Have steep roof pitches of only open gable or cross gable, single ridge roof forms and not of hipped, half hipped or other roof forms, with the roof either unbroken or with dormers set well within the roof slope above the eaves

	<ul style="list-style-type: none"> • Have roof valleys formed by only stone slates swept to a curve with plain shallow eaves and verges and no overhangs, exposed rafter feet, fascias or bargeboards • Have chimneys set to the ridge line, with stacks integral and flush to gable end walls • Have window openings that are well spaced and fairly small, with sizeable areas of wall in between; openings usually centrally placed within gables, and end walls containing chimneys usually blank, or with sparse and offset fenestration. • Have two and three light windows, with a clear hierarchy to the openings of wider ground floor windows below smaller upper floor windows. • Have either stone mullion window surrounds, directly glazed or containing metal casements, and sometimes with stone hood moulds above or have simple flush timber casements, with slender glazing divisions, set below stone or timber lintels • Have doors that are solid timber boarded and, for commercial premises have up to 40% of the total door area as glass • Avoid front porches, which are not a feature of the Conservation Area • Garden areas enclosed by only dry stone walling <p>There are some excellent examples of modern houses built of Cotswold Stone or of modern materials which replicate Cotswold Stone.</p>
	ARCHITECTURAL STYLE: CONTEMPORARY
D34C	<p><i>“Modern design may also facilitate the incorporation of sustainable features more readily than when following a traditional design approach....”</i></p> <p>CONTEXT: A key objective of the Neighbourhood Plan is that development proposals should seek to mitigate the effects of climate change. The community recognises that many historic buildings are energy inefficient and that undertaking remedial work to incorporate sustainable technologies risks an unacceptable impact on the historic context.</p>



CODING However, the use of contemporary design and/or materials may be supported in an alteration or extension of an historic building where it is not visible and enables or supports improved sustainability and does not detract from the historical context of the building involved. The use of visible contemporary design and materials is not supported in historic buildings in this sub-area. For extensions or alterations to modern buildings or for new buildings, development proposals that include contemporary design features and materials which enable or support improved sustainability are encouraged as long as any visible technology does not detract from any adjacent historic building.

MATERIALS AND CRAFTMANSHIP

D36C “The colour of Cotswold Stone varies across the District..... and rich honey colours in the North.....”

CONTEXT: There is some variation in the colour of Cotswold stone used in historic buildings and from the same material source. This variation adds to the distinct and special character of the historic buildings. Cotswold stone should be used for external alterations and extensions to historic buildings, including new or replacement external walls and roofs. the colour should be consistent with that already used for the building concerned. Walls should be laid and mortared so as to remain coherent with the building concerned. The use of reconstituted stone, and synthetic materials for external alterations and extensions to historic buildings should be avoided. There has over the last century or so been some use of blue slate as a substitute for stone roof tiles. Replacement of stone tiles with slate should be avoided.


	<p>CODING For new buildings, the use of Cotswold stone is encouraged for walls and roofs. Where it is felt that an alternative is unavoidable or preferable, an explanation should support the application e.g. a garage or extension to a modern house not built of Cotswold Stone. Wooden or tile hanging on walls is not encouraged. However wooden dressing of walls is acceptable for buildings on the edge of the countryside, that emulate agricultural buildings. Blue slate is acceptable on outbuildings and extensions, where it is used for roofing of the main building.</p>
D37C D38C D39C	<p><i>“There are various styles of walling stone within the Cotswolds. Many higher status buildings are constructed in ashlar stonework. This consists of straight cut, finely tooled blocks of stone, laid to their natural bed, with very tight mortar joints.”</i></p> <p><i>“More commonly walls are constructed of Cotswold Rubble stone....Many buildings are built up in rougher less worked rubble stone....”</i></p> <p><i>“Mortars are traditionally lime based....”</i></p> <p>CONTEXT: Both Ashlar dressed Cotswold Stone and rougher ‘rubble’ stone are seen.</p> <p>CODING Proposals for alterations or extensions should use the type of stone or other building materials relevant to the building being altered. Where Cotswold stone is used for new buildings rough or rubble stone is acceptable.</p>
D42C	<p><i>“Other traditional building materials also make an important contribution to local character. Some red brick is seen.....”</i></p> <p>CONTEXT: Red brick is rarely seen in the Character Area.</p> <p>CODING The use of red brick should be avoided.</p>
D45C	<p><i>From the nineteenth century onwards there is more use of blue-grey Welsh slate, for re-roofing”</i></p> <p>CONTEXT: Blue-grey Welsh slate is rarely used on historic buildings in the Character Area.</p> <p>CODING Existing Cotswold stone roofs should not be replaced or repaired with blue slate. Blue slate may be used for new buildings.</p>

D46C	<p><i>“Some use of thatch is also seen in the District.....Plain clay tile is seen in some locations and clay pantiles”</i></p> <p>CONTEXT: Thatch is not used as roofing material in any part of the Character Area.</p> <p>CODING Thatch should not be used as a roofing material.</p>
D55C	<p><i>“There are also examples of red brick walls and other boundary treatments.....”</i></p> <p>CONTEXT: Boundaries of historic and many modern buildings are marked with Cotswold Stone walls in this sub-area.</p> <p>CODING New or replacement boundaries to historic properties within the sub-area should be of Cotswold stone construction. Existing traditional Cotswold stone walls, and native hedgerows should be preserved, and appropriately maintained and managed, both during and after construction. Some more recent buildings have modern boundary treatments. The use of Cotswold stone or native hedging for boundaries is encouraged.</p>
D57C	<p><i>“Paving is traditionally limestone or Yorkshire flags. Stone cobbles, blue engineering bricks and other traditional setts are commonly seen. And crushed limestone or bound gravel can also be sympathetic surface finishes.”</i></p> <p>CONTEXT: Parts of the sub-area have retained limestone flags as a paving material; the remainder comprises a mix of modern materials.</p> <p>CODING Any new or refurbished paving should use the same traditional material as that of any existing traditional paving of the building(s) concerned or adjacent to it. Where such paving is no longer manufactured, the materials should be as near as possible the same character.</p>
GREEN INFRASTRUCTURE	
D66C	<p><i>High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments.....”</i></p> <p>CONTEXT: Many parts of the Character Area include gardens and shared spaces with trees, and hedges forming the front, side and rear boundaries to the plot.</p>


	<p>CODING Development proposals must protect the existing green infrastructure and include landscaping schemes that make provision for generous front and rear plot planting for boundary treatment. Planting of native trees of appropriate height is encouraged. Developments of twenty or more new houses are expected to provide a play area and allotments whose size and design should be agreed with Stow Town Council, unless such provision already exists within 500 metres. Plans for managing surface water run off should be provided and explain how they will be integrated with existing and new green infrastructure.</p>
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CODE NO.	CHARACTER AREA D: STOW ON THE WOLD: NORTH AND WEST
	LANDSCAPE, SETTLEMENTS AND STREETS
D9D	<p><i>“Each site will have its own characteristics and a specific landscape setting.”</i></p> <p>CONTEXT: This Character Area lies along A429, Fosse Way from the southern to the northern parish boundary of Stow. To the west the sub area faces down the slope of the Wold to Lower Swell village - and contains the important, protected green space of the Queen Elizabeth II playing field. For most of its length within the Stow boundary, the east of Fosse Way lies within the Conservation Area, so that properties on the west side of Fosse Way in sub-area 3 face historic properties on the east side. Beyond the Conservation Area, the east side of Fosse Way has been developed to provide a car park, a supermarket, Edwardstow dementia home, and a McCarthy and Stone care village for older people. The west of Fosse Way has mostly been developed in the 20th and 21st centuries. Along this side of Fosse way, from the southern border of Stow to the B4068, Lower Swell Road are the Brethren Meeting Hall and car park, a number of detached houses with large gardens, two older terraced two storey cottages and a further detached single storey cottage. Adjacent to the Lower Swell Road are a petrol station and a retail wine store. There is thus no predominant character.</p> <p>On either side of the Lower Swell Road, modern development has taken place in Cotswold Stone, mostly of terraced or semi-detached dwellings. Beyond the Lower Swell Road lies a car park and a pair of recently built semi-detached houses in Cotswold Stone. Beyond that lie a number of large and detached dwellings looking out over the Queen Elizabeth II playing field to the Wolds beyond. The majority of these houses stand in large gardens but those under development at present on the Old Bowling Green are of a much higher density.</p> <p>Development has taken place along both the B4077, Tewkesbury Road and the A424, Evesham Road. These dwellings include both detached houses and bungalows and terraced houses. To the west of Fosse Way beyond the A4424 lies Fosse Folly, a small modern development of terraced dwellings. Fosse Lane is an unadopted lane running from Fosse Way to the A424. Dwellings here are detached, semi-detached and terraced. Further north on the west side of Fosse Way lie detached houses with large plot sizes. Again there is no predominant character.</p> <p>CODING New dwellings should not be built within the gardens of historic houses and cottages and proposals within or to extend must include in their landscape schemes provision for significant, mature trees and hedges at all rear plot boundaries.</p>
D10D	<p><i>“Settlements are distinctive in how they sit within the landscape..... they have their own unique layouts and patterns of streets.”</i></p>

	<p>CONTEXT: There are a large variety of building styles, finishes and sizes in this sub-area with no predominant character. Buildings to the west of Fosse Way are visible on the skyline from Lower Swell, although shielded to some extent by mature trees. Buildings to the east of Fosse Way are sheltered to the east by landscape planting. Most of the buildings sit off the original five roads.</p> <p>CODING As there is no single dominant building type, development proposals should be of a scale, mass and height commensurate with existing adjacent buildings or where there are none, sufficient detail should be supplied to demonstrate how the proposals are sensitive to the historic and rural context.</p>
D11D	<p><i>“Cotswolds Towns typically have many buildings tightly arranged at their core, with building lines set immediately on, or close to, the rear of the pavement. Many feature gently curving streets, and are centred on wide thoroughfares or market places. Nearly all settlements incorporate important open spaces. Some Cotswold Villages are arranged around village greens. Others are set out in linear fashion or are more dispersed.”</i></p> <p>CONTEXT: The Character Area is not typical of a traditional Cotswold Town being more suburban in nature, although a degree of coherence is achieved through the use of Cotswold Stone in both historic and modern buildings or in the latter case of modern materials which replicate Cotswold Stone. Dwellings generally have front and rear gardens and off-street parking.</p>  <p>CODING Proposals for alterations or extensions to existing properties should retain existing off-street parking.</p>

D12D	<p><i>“..... An understanding of key views is critical.”</i></p> <p>CONTEXT: The following are considered key views:</p> <ul style="list-style-type: none"> • View west from various points along Fosse Way (especially from its junction with Tewkesbury Road), Monarchs Way and Lower Swell Road across agricultural fields and pasture to Lower Swell and to the surrounding and distant Wolds • Views of the church tower and of the wider Cotswold landscape to the east from Fosse Way near the cemetery • View west and south west from the Queen Elizabeth II playing field and Evesham Road across agricultural fields and pasture to the Swells and the grounds of Abbotswood • View south east from Broadwell Lane near Fosse Way <p>The incidence of glimpse views between buildings on Fosse Way west towards Lower Swell and Slaughter Woods is of interest.</p> <p>CODING: The location and orientation of new buildings in the plot should reinforce and not obstruct, disrupt or weaken the framing of a key view or of a glimpse view.</p>
SCALE AND PROPORTION	
D16D	<p><i>“New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context.”</i></p> <p>CONTEXT: The existing dwellings in the sub-area, whether historic or modern, are of human scale and in general do not dominate the experience of passing pedestrians or other buildings.</p> 

	<p>CODING The density of new buildings can be varied, reflecting the varied character of the area. There is no requirement to emulate buildings in any part of the area but development proposals for new residential accommodation which demonstrate creativity in providing adaptive homes that can change with the needs of residents over time while not increasing the overall height, mass and scale, are encouraged.</p>
	<p>ARCHITECTURAL STYLE: COTSWOLD VERNACULAR</p>
D22D and 25D	<p><i>"Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition....."</i></p> <p><i>"Some key qualities of the Cotswold vernacular are...."</i></p> <p>CONTEXT The Character Area forms a very important part of the identity of the town in encompassing its main entrance points from the north, south and west. The Cotswolds vernacular has a strong presence in the area, although most often expressed in modern building forms.</p> <p>CODING For historic buildings it is vital that all proposals for the extension or replacement of existing buildings or for infill schemes:</p> <ul style="list-style-type: none"> • Are of a simplicity of form and design of an understated appearance, with any ornamentation usually limited to architectural features • Have a plot width to the frontage that maintains the variety of rhythm of those widths • Have steep roof pitches of only open gable or cross gable, single ridge roof forms and not of hipped, half hipped or other roof forms, with the roof either unbroken or with dormers set well within the roof slope above the eaves • Have roof valleys formed by only stone slates swept to a curve with plain shallow eaves and verges and no overhangs, exposed rafter feet, fascias or bargeboards • Have chimneys set to the ridge line, with stacks integral and flush to gable end walls • Have window openings that are well spaced and fairly small, with sizeable areas of wall in between; openings usually centrally placed within gables, and end walls containing chimneys usually blank, or with sparse and offset fenestration. • Have two and three light windows, with a clear hierarchy to the openings of wider ground floor windows below smaller upper floor windows. • Have either stone mullion window surrounds, directly glazed or containing metal casements, and sometimes with stone hood moulds above or have simple flush timber casements, with slender glazing divisions, set below stone or timber lintels • Have doors that are solid timber boarded and, for commercial premises have up to 40% of the total door area as glass • Avoid front porches, which are not a feature of the Conservation Area • Garden areas enclosed by only dry stone walling

	For other buildings, there are some excellent examples of modern houses built of Cotswold Stone or of modern materials which replicate Cotswold Stone. Development proposals relating to modern or new buildings are expected to provide sufficient detail to demonstrate sensitivity to adjacent historic buildings on which they will have an impact.
ARCHITECTURAL STYLE: CONTEMPORARY	
D30D	<p><i>“On many listed buildings, in some prominent locations,.....a contemporary building may appear too starkly out of keeping.....”</i></p> <p>CONTEXT Modern methods of construction and materials are common.</p> <div data-bbox="591 461 1693 1007">  </div> <p>CODING Proposals for contemporary architectural styles may be appropriate in principle.</p>
MATERIALS AND CRAFTMANSHIP	
D36D	<p><i>“ The colour of Cotswold Stone varies across the District..... and rich honey colours in the North.....”</i></p> <p>CONTEXT There is some variation in the colour of Cotswold stone used in historic buildings and from the same material source. This variation adds to the distinct and special character of the historic buildings. There has over the last century or so been some use of blue slate as a substitute for stone roof tiles.</p>

	<p>CODING Cotswold stone should be used for external alterations and extensions to historic buildings, including new or replacement external walls and roofs. The colour should be consistent with that already used for the building concerned. Walls should be laid and mortared so as to remain coherent with the building concerned. The use of reconstituted stone, and synthetic materials for external alterations and extensions to historic buildings should be avoided. Replacement of stone tiles with slate should be avoided.</p> <p>For new buildings, the use of Cotswold stone is encouraged for walls and roofs. Where it is felt that an alternative is unavoidable or preferable, an explanation should support the application e.g. a garage or extension to a modern house not built of Cotswold Stone. Wooden or tile hanging on walls is not encouraged. However wooden dressing of walls is acceptable for buildings on the edge of the countryside, that emulate agricultural buildings. Blue slate is acceptable on outbuildings and extensions, where it is used for roofing of the main building.</p>
D38D	<p><i>“More commonly walls are constructed of Cotswold Rubble stone....Many buildings are built up in rougher less worked rubble stone....”</i></p> <p>CONTEXT: Both Ashlar dressed Cotswold Stone and rougher ‘rubble’ stone are seen.</p> <p>CODING Proposals for alterations or extensions should use the type of stone or other building materials relevant to the building being altered. Where Cotswold stone is used for new buildings rough or rubble stone is acceptable.</p>
D42D	<p><i>“Other traditional building materials also make an important contribution to local character. Some red brick is seen.....”</i></p> <p>CONTEXT: Red brick is not seen in the Character Area.</p> <p>CODING The use of red brick as a facing material is not appropriate.</p>
D45D	<p><i>From the nineteenth century onwards there is more use of blue-grey Welsh slate, for re-roofing”</i></p> <p>CONTEXT: Blue-grey Welsh slate is not used on historic buildings.</p> <p>CODING Existing Cotswold stone roofs should not be replaced or repaired with blue slate. Blue slate may be used for new buildings.</p>

D46D	<p><i>“Some use of thatch is also seen in the District.....Plain clay tile is seen in some locations and clay pantiles”</i></p> <p>CONTEXT: Thatch is not used as roofing material in any part of the Character Area.</p> <p>CODING The use of thatch as a roofing material is not appropriate.</p>
D55D	<p><i>“There are also examples of red brick walls and other boundary treatments....”</i></p> <p>CONTEXT Boundaries of historic and many modern buildings are marked with Cotswold Stone walls. Some more recent buildings in the sub-area area have modern boundary treatments.</p> <p>CODING New or replacement boundaries to historic properties within the sub-area should be of Cotswold stone construction. Existing traditional Cotswold stone walls, and native hedgerows should be preserved, and appropriately maintained and managed, both during and after construction. The use of Cotswold stone or native hedging for boundaries is encouraged.</p>
GREEN INFRASTRUCTURE	
D66D	<p><i>High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments.....”</i></p> <p>CONTEXT Many parts of the Character Area include gardens and shared spaces with trees, and hedges forming the front, side and rear boundaries to the plot.</p> <p>CODING Development proposals must protect the existing green infrastructure and include landscaping schemes that make provision for generous front and rear plot planting for boundary treatment. Planting of native trees of appropriate height is encouraged.</p>


CODE NO.	CHARACTER AREA E: LOWER SWELL
LANDSCAPE, SETTLEMENTS AND STREETS	
D10E	<p><i>“Settlements are distinctive in how they sit within the landscape ... they have their own unique layouts and patterns of streets”.</i></p> <p>CONTEXT: Lower Swell lies in the valley of the River Dikler at the western foot of the hill on which sits Stow-on-the-Wold, and is linked to the smaller Upper Swell by the river, a tributary of the Windrush. It shows signs of having been occupied from at least Bronze and Iron Age times. The Parish is deeply rural in character and has depended economically on farming. Almost all the village lies within the designated Conservation Area.</p> <div data-bbox="495 531 1850 1038">  </div> <p>The village sits well within the landscape running along the foot of the gentle slopes of the Dikler Valley. School Lane and Church Lane rise up the slopes either side but the village is generally hidden and is only dramatically revealed at its entrances. Upper Swell sits low on steeper slope of the same valley to the north of Lower Swell. It too is generally hidden in the landscape with woodland to its east and by the higher ground to its west and north, only being revealed at its entrances.</p> <p>CODING: Any future infill, redevelopment or extension of the villages should likewise sit low within the landscape and should not compromise the sharp sense of arrival at their entrances.</p>

D11E *“Cotswolds Towns typically have many buildings tightly arranged at their core, with building lines set immediately on, or close to, the rear of the pavement. Many feature gently curving streets, and are centred on wide thoroughfares or market places. Nearly all settlements incorporate important open spaces. Some Cotswold Villages are arranged around village greens. Others are set out in linear fashion, or are more dispersed.”*

CONTEXT: The village is clustered around village amenities and key assets, such as the 12th century St. Mary’s church, the small village green, the war memorial, Lower Swell primary school (1825), the village hall and the 17th century, Golden Ball public house. There is an ancient well in Lower Swell known as the Lady’s Well, thought to have been a sacred spring. It has grown slowly and organically. The centre of the village consists of many listed buildings and other buildings of historic group value in their settings. The oldest surviving houses in Lower Swell are 16th or 17th Century. There is a remarkable example of Hindu style in the building in Lower Swell now called Spa Cottages which was constructed in 1807 at the site of a mineral water spring (now long since dry).



Its structure comprises a main road with two minor roads coming off a junction near one end of the village. On the main road, all the buildings front on to the main road, either at the back of pavement to narrow views through the village, notably at the Golden Ball Inn and Old Farmhouse Hotel, or further set back from the road in common alignments, e.g. Cotswolds Gables. These arrangements create variety in the street profile and the sequences of spaces along the road. The open fields to the south of the main road in the eastern half of the village allow for expansive views but the space is partially contained by the line of mature trees along the road. Similarly, the green space opposite the Old Farmhouse Hotel contrasts with the more tightly contained spaces either side of it, one of which is formed by the war memorial. It is enclosed by two terraces at Fox Close; although they are not historic buildings they adhere to the essence of the vernacular and therefore add value to the character of the space.

	<p>The war memorial (by Lutyens) is a notable feature of the village and of great historic importance; its space – a small village green – is tightly enclosed by the buildings at the back of pavement to the main road and the lane to the church as well as the very tall mature trees on the opposite side. That space leads almost immediately to another enclosed but different space – another smaller village green – that is framed by the same trees, Barn Cottage and Whittlestone Close, but with the small vernacular village hall and a surrounding circle of tall trees in its centre. The terrace at Cranmer Cottage a little way up the lane is perpendicular to the lane on higher ground and also helps define the space. The school lane has a very different character to the rest of the village. Its tight street profile for most of its length is created by buildings on both sides located at the back of pavement, with only Rectory Farmhouse and the school opposite, which is of a lower height, sitting slightly back from the road. Its gentle curve and rise add further interest to the streetscape.</p> <p>CODING: The location and orientation of new buildings within the plot must work with the essential grain and character of the street space. Their patterns are strong and their relationship with the topography and landscape is harmonious – even where new buildings have been added in more recent years.</p>
D12E	<p><i>“..... An understanding of key views is critical.”</i></p> <p>CONTEXT: The distinct character of the village is formed by the long view along the main road through the village and from the views into the village from the roads main entrances, i.e. from Stow, Naunton and Upper Swell. There are many views from vantage points within the village of the countryside beyond, reinforcing its deep rural character.</p> 

	<p>CODING: The location and orientation of new buildings in the plot should reinforce and not obstruct, disrupt or weaken the framing of the views into and through the village to its centre.</p>
<p>SCALE AND PROPORTION</p>	
D16E	<p><i>“New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context.”</i></p>
D17E	<p><i>“Excessive or uncharacteristic bulk should be avoided. New buildings should generally not dominate their surroundings but should</i></p>
D18E	<p><i>complement the existing structures and landscape and sit comfortably within their setting.”</i></p> <p><i>“The height of new buildings should respond to the local context, for example forming a gentle transition from open countryside to settlement edge.”</i></p> <p>CONTEXT: The Cotswold vernacular is light and subtle in building height and massing and in site prominence. In the Conservation Area all the buildings are two storey and of a domestic scale. The small number of grand houses on their edges are taller but are generally hidden from the public domain. There are some occasional low cottages of one and a half or two storeys.</p> <p>CODING: Any proposal for infill development must be no more than two storeys in building height with a massing that is subservient to that of the existing buildings.</p>
<p>ARCHITECTURAL STYLE: COTSWOLD VERNACULAR</p>	
D21E	<p><i>Many Cotswold Villages are quintessential English Villages. The distinctive traditional architecture of the area is famous worldwide. Buildings have, for many centuries, had a relatively uniform and consistent style, resulting from the use of the local stone and traditional construction techniques. This is known as the Cotswold vernacular.”</i></p> <p>CONTEXT: The Conservation Area is among the strongest and most consistent examples of the Cotswold vernacular in the District. Its overriding feature is in the use of the honey and golden coloured oolitic Jurassic limestone as the primary building material. It has changed very little in decades, with new buildings adopting the same vernacular form and style. There are variations in design, for example of windows, architectural features, roof lines and entrances, with adjacent properties having very different styles, but with a pleasing coherence provided by the Cotswold vernacular. An example is the row of buildings from The Old Smithy to Leys View Cottage (including the listed Travellers Joy) at its eastern end, where each of the old cottages has its own character through original design and evolution of the dwellings.</p>



CODING: All development proposals should comprise the Cotswold vernacular as an essential element of their architectural style and should demonstrate an understanding of how such variations in design, emulating these historic variations, can be used to add to the architectural value of the proposed development, extension or alteration. The row of buildings from The Old Smithy to Leys View Cottage should form an inspiration.

D25E *“Some key qualities of the Cotswold vernacular are....”*

CONTEXT: There is a very strong and consistent use of the Cotswold vernacular in the Character Area, which is a fundamental element of its very special historic and architectural significance and the setting of its many Listed Buildings and other heritage assets.



	<p>CODING : With the very strong and consistent Cotswold vernacular a fundamental element of the very special historic and architectural significance of both Conservation Areas and the setting of their many Listed Buildings and other heritage assets, it is vital that all proposals for the extension or replacement of existing buildings or for infill schemes:</p> <ul style="list-style-type: none"> • Are of a simplicity of form and design of an understated appearance, with any ornamentation usually limited to architectural features • Have a plot width to the frontage that maintains the variety of rhythm of those widths • Have steep roof pitches of only open gable or cross gable, single ridge roof forms and not of hipped, half hipped or other roof forms, with the roof either unbroken or with dormers set well within the roof slope above the eaves • Have roof valleys formed by only stone slates swept to a curve with plain shallow eaves and verges and no overhangs, exposed rafter feet, fascias or bargeboards • Have chimneys set to the ridge line, with stacks integral and flush to gable end walls • Have window openings that are well spaced and fairly small, with sizeable areas of wall in between; openings usually centrally placed within gables, and end walls containing chimneys usually blank, or with sparse and offset fenestration. • Have two and three light windows, with a clear hierarchy to the openings of wider ground floor windows below smaller upper floor windows. • Have either stone mullion window surrounds, directly glazed or containing metal casements, and sometimes with stone hood moulds above or have simple flush timber casements, with slender glazing divisions, set below stone or timber lintels • Have doors that are solid timber boarded and, for commercial premises have up to 40% of the total door area as glass • Avoid front porches, which are not a feature of either Conservation Area
ARCHITECTURAL STYLE: CONTEMPORARY	
D22E D30E	<p><i>“Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition ... The decision whether to adopt a vernacular or more contemporary architectural style will depend upon the type of development, the site and its setting ... On many listed buildings, in some prominent locations,.....a contemporary building may appear too starkly out of keeping.....”</i></p> <p>CONTEXT: The Conservation Area has a very strong adherence to the Cotswold vernacular and is of a compact size. There are no examples of contemporary buildings styles of note in the Conservation Area.</p>



CODING: The village is not generally a suitable location for contemporary design solutions for replacement or infill buildings, structures, boundary treatments or external lighting. However, a contemporary solution may be in keeping with the dominant vernacular in locations that are not very prominent in the streetscene, i.e. the building will not lie at or close to the back of pavement nor will punctuate or terminate a view through the Conservation Area. Contemporary building styles are appropriate in those parts of the village outside the Conservation Area that are formed by generally modern style buildings. The modern requirements for refuse collection should be met within the fabric of the building.

MATERIALS AND CRAFTMANSHIP

- D36E *“ The colour of Cotswold Stone varies across the District..... and rich honey colours in the North.....”*
- D37E *“There are various styles of walling stone within the Cotswolds. Many higher status buildings are constructed in ashlar stonework. This consists of straight cut, finely tooled blocks of stone, laid to their natural bed, with very tight mortar joints. ”*
- D38E *“More commonly walls are constructed of Cotswold Rubble stone....Many buildings are built up in rougher less worked rubble stone....”*
- D39E *Mortars are traditionally lime based....”*

CONTEXT: In the Conservation Area there is the almost ubiquitous use of Ashlar dressed Cotswold stone or rubble stone dominate for listed buildings and non-listed buildings of a later date that have significant group value in the setting of those listed buildings. There is therefore a very strong uniformity of overall appearance, even though building forms and styles may differ within the vernacular.



CODING: Any new infill buildings and proposals for external alterations and extensions, including new or replacement external walls and roofs, should normally be constructed using one or both these materials or those of a similar appearance. Given that all the buildings in the village outside the Conservation Area lie within its setting and have a close visual inter-relationship, this applies in those parts too, although there may be more scope of alternative material palettes.

D42E *“Many Cotswold vernacular buildings were rendered historically....”*

CONTEXT: Although there has been some rendering of walls in the Conservation Area, this does not sit well with the historic Cotswold vernacular.

CODING: Roughcast or other rendering and lime washing are not appropriate finishes in the Conservation Area but may be used elsewhere in the village.

D44E *“Other traditional building materials also make an important contribution to local character. Some red brick is seen.....”*

CONTEXT: There is no use of red brick in the Conservation Area or elsewhere in the village. Its use would be incongruous with the dominant Cotswold vernacular of the Conservation Area and the small size of the village would make this material jar within its setting.

CODING: Red brick should not be used as a material for any type of building or structure, including extensions or alterations anywhere in the village.

D45E	<p><i>“From the nineteenth century onwards there is more use of blue-grey Welsh slate, for re-roofing”</i></p> <p>CONTEXT: Cotswold Stone is used as the roofing material for almost every building in the Conservation Area. The use of Welsh slate is rare.</p> <p>CODING: In the Conservation Area, all new or replacement roofs should use Cotswold stone tiles unless the original or main building already has Welsh slate. There should be no replacement of original stone tiles with artificial stone tiles (or blue slate where Welsh slate is in situ). Buildings outside the Conservation Area may use artificial stone tiles or blue slate (as relevant).</p>
D46E	<p><i>“Some use of thatch is also seen in the District.....Plain clay tile is seen in some locations and clay pantiles”</i></p> <p>CONTEXT: Thatch is not used as roofing material in any part of the Conservation Areas. There is no tradition of use of clay tiles or pantiles or wall hanging with tiles in the Conservation Area. The use of these materials would be incongruous with the dominant Cotswold vernacular of the Conservation Area and the small size of the village would make this material jar within its setting.</p> <p>CODING: The use of thatch, clay tiles, pantiles or wall hanging with tiles as a roofing materials is not appropriate anywhere in the village.</p>
D50E	<p><i>“Even the choice of finishes can make a vast difference to the character and appearance of buildings, such as window and door paint coloursColours should normally be selected from a fairly traditional palette....”</i></p> <p>CONTEXT: Almost all historic buildings share a palette of polite colours for the painting of their windows and doors in the Conservation Area which complement the subtle tones of the Cotswold Stone of buildings. Outside the Conservation Area there is a wider range of paint colours, although the majority of buildings have used the same palette.</p> <p>CODING: The use of primary and other, non-polite colours for painting timber is not appropriate in the Conservation Area. Outside the Conservation Area, any paint colour may be used although the dominant palette is encouraged.</p>
D55E	<p><i>“There are also examples of red brick walls and other boundary treatments....”</i></p> <p>CONTEXT: Boundaries are normally marked with Cotswold Stone walls or hedges often lying behind a mown grass verge in the Conservation Area and elsewhere in the village.</p>

	<p>CODING: New or replacement boundaries to properties anywhere in the village should be of either Cotswold stone construction or a new or replacement hedge of a type and height that matches others in the Conservation Area, preserving the grass verge, where extant. Existing Cotswold stone walls, and native hedgerows should be preserved, and appropriately maintained and managed, both during and after construction.</p>
SUSTAINABLE DESIGN	
D62E	<p>” Sustainable design needs to be responsive to the character of the area and the sensitivities of the site.....”</p> <p>CONTEXT: The strength of the character of the Conservation Area is such that contemporary architectural features are likely to detract from that character, especially where very prominent in the streetscene.</p> <p>CODING: As future planning policy requirements are expected to require significant improvements to the carbon performance of all buildings, it is vital that the location and form of additions and alterations to buildings that require planning permission are handled very sensitively. All proposals of this type must demonstrate that their design and location on or around the building have avoided or minimised any harmful visual effects on the Conservation Area of the technical options available.</p>
GREEN INFRASTRUCTURE	
D66E	<p><i>High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments.....“</i></p> <p>CONTEXT: The combination of mature trees and hedges is a strong feature of the character of the main road and they help define key spaces along the main road, most notably those around the war memorial and the village hall. In contrast there is little greenery in the public domain along School Lane until towards its end with Mill Lane, although there are many mature trees in private gardens.</p> <p>CODING: It is essential that any necessary proposal for the removal of trees that occupy very prominent positions in the street scene makes provision of the immediate replanting of mature species of the same type at or as close to the existing position as possible. Landscape schemes should not propose new tree planting forward of any existing building line or elsewhere within the plot that may obstruct or disrupt a key view.</p>

SIGNAGE

D67E *"... Lighting of signage should be avoided....."*

CONTEXT: The external sign at the Golden Ball PH in the heart of the village is prominent in views along the main road and is of a style that reflects the historic interest of this listed building.



CODING: Proposals to replace and light the sign and bracket with equivalents in a modern style are not appropriate.

CODE NO.	CHARACTER AREA F: UPPER SWELL
LANDSCAPE, SETTLEMENTS AND STREETS	
D10F	<p><i>“Settlements are distinctive in how they sit within the landscape ... they have their own unique layouts and patterns of streets”.</i></p> <p>CONTEXT: The village of Upper Swell lies in the valley of the River Dikler at the western foot of the hill on which sits Stow-on-the-Wold, and is linked to Lower Swell by the river, a tributary of the Windrush. It shows signs of having been occupied from at least Bronze and Iron Age times. The Parish here is deeply rural in character and has depended economically on farming. Almost all the village lies within a designated Conservation Area. It is much smaller than its sister village and farming there was probably dependent upon the mediaeval manor of Swell. There was also a mill by the ancient bridge over the Dikler, which is thought by some to have Roman stonework, to which grain was brought from around the area for milling. A manor house was built in the 16th Century next to the church, probably to distinguish the village from Lower Swell.</p> <div data-bbox="734 619 1632 1209">  </div> <p>CODING: Any future infill, redevelopment or extension of the village should sit low within the landscape and should not compromise the sharp sense of arrival at its entrances.</p>

D11F	<p><i>“Cotswolds Towns typically have many buildings tightly arranged at their core, with building lines set immediately on, or close to, the rear of the pavement. Many feature gently curving streets, and are centred on wide thoroughfares or market places. Nearly all settlements incorporate important open spaces. Some Cotswold Villages are arranged around village greens. Others are set out in linear fashion, or are more dispersed.”</i></p> <p>CONTEXT: Upper Swell is very much smaller than Lower Swell, comprising the farm vernacular buildings of Upper Swell House, Upper Swell Farm and the Manor House at its centre with a smaller cluster of buildings at the Old Mill and Bridge Cottage on the Dikler at the foot of the hill framing the eastern entrance to the village. The hill and the slight curve in the road create delight in a second point of arrival in the village revealed on its ascent, with the pair of stone cottages terminating the view before the tight corner is turned behind the Manor House barn at the road edge beyond the Old Rectory is prominent in setting up the reveal of the centre of the village. From the western entrance to the village – announced by the delightful group of buildings of Manor House – the long, low barn at the road edge is prominent and with the Manor House Barn opposite frames the view to Upper Swell Farm. Its main barn is especially dominant in the space created at the village centre and together these agricultural buildings very clearly show the rural nature of the village. St. Mary’s Church sits behind Manor House and Manor Farm Cottage and is only gradually revealed on ascending the slope from behind its gate and line of tall trees. The small verge and pathway form the only public space in the village.</p> <p>CODING: The location and orientation of new buildings within the plot must work with the essential grain and character of the street space. Their patterns are strong and their relationship with the topography and landscape is harmonious – even where new buildings have been added in more recent years.</p>
D12F	<p><i>“..... An understanding of key views is critical.”</i></p> <p>CONTEXT: The distinct character of the village is formed by two specific views along the main road into the village from its north and south.</p> <div data-bbox="732 1040 1626 1378">  </div>

	CODING: The location and orientation of new buildings in the plot should reinforce and not obstruct, disrupt or weaken the framing of the views into and through the village to its centre.
SCALE AND PROPORTION	
D16F	<i>“New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context.”</i>
D17F	<i>“Excessive or uncharacteristic bulk should be avoided. New buildings should generally not dominate their surroundings but should</i>
D18F	<i>complement the existing structures and landscape and sit comfortably within their setting.”</i> <i>“The height of new buildings should respond to the local context, for example forming a gentle transition from open countryside to settlement edge.”</i>
	CONTEXT: The Cotswold vernacular is light and subtle in building height and massing and in site prominence. In the Conservation Area only the church rises a little above the other buildings in the village, which are almost all two storey and of a domestic scale. The small number of grand houses on their edges are taller but are generally hidden from the public domain. The barn buildings in the village centre have a distinct form that contrasts well with their immediate neighbours. There are some occasional low cottages of one and a half or two storeys.



CODING: Any proposal for infill development must be no more than two storeys in building height with a massing that is subservient to that of the existing buildings.

ARCHITECTURAL STYLE: COTSWOLD VERNACULAR

D21F *Many Cotswold Villages are quintessential English Villages. The distinctive traditional architecture of the area is famous worldwide. Buildings have, for many centuries, had a relatively uniform and consistent style, resulting from the use of the local stone and traditional construction techniques. This is known as the Cotswold vernacular."*

CONTEXT: The Conservation Area is among the strongest and most consistent examples of the Cotswold vernacular in the District. Its over-riding feature is in the use of the honey and golden coloured oolitic Jurassic limestone as the primary building material. It has changed very little in decades, with new buildings adopting the same vernacular form and style. There are variations in design, for example of windows, architectural features, roof lines and entrances, with adjacent properties having very different styles, but with a pleasing coherence provided by the Cotswold vernacular.



CODING: All development proposals should comprise the Cotswold vernacular as an essential element of their architectural style and should demonstrate an understanding of how such variations in design, emulating these historic variations, can be used to add to the architectural value of the proposed development, extension or alteration.

D25F *"Some key qualities of the Cotswold vernacular are...."*

CONTEXT: There is a very strong and consistent use of the Cotswold vernacular in the Character Area, which is a fundamental element of its very special historic and architectural significance and the setting of its many Listed Buildings and other heritage assets.

CODING: it is vital that all proposals for the extension or replacement of existing buildings or for infill schemes:

- Are of a simplicity of form and design of an understated appearance, with any ornamentation usually limited to architectural features
- Have a plot width to the frontage that maintains the variety of rhythm of those widths
- Have steep roof pitches of only open gable or cross gable, single ridge roof forms and not of hipped, half hipped or other roof forms, with the roof either unbroken or with dormers set well within the roof slope above the eaves

- Have roof valleys formed by only stone slates swept to a curve with plain shallow eaves and verges and no overhangs, exposed rafter feet, fascias or bargeboards
- Have chimneys set to the ridge line, with stacks integral and flush to gable end walls
- Have window openings that are well spaced and fairly small, with sizeable areas of wall in between; openings usually centrally placed within gables, and end walls containing chimneys usually blank, or with sparse and offset fenestration.
- Have two and three light windows, with a clear hierarchy to the openings of wider ground floor windows below smaller upper floor windows.
- Have either stone mullion window surrounds, directly glazed or containing metal casements, and sometimes with stone hood moulds above or have simple flush timber casements, with slender glazing divisions, set below stone or timber lintels
- Have doors that are solid timber boarded and, for commercial premises have up to 40% of the total door area as glass
- Avoid front porches, which are not a feature of either Conservation Area



ARCHITECTURAL STYLE: CONTEMPORARY	
D22F D30F	<p><i>“Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition ... The decision whether to adopt a vernacular or more contemporary architectural style will depend upon the type of development, the site and its setting ... On many listed buildings, in some prominent locations,.....a contemporary building may appear too starkly out of keeping.....”</i></p> <p>CONTEXT: The Conservation Area has a very strong adherence to the Cotswold vernacular and is of a compact size. There are no examples of contemporary buildings styles of note in the Conservation Area.</p> <p>CODING: The village is not generally a suitable location for contemporary design solutions for replacement or infill buildings, structures, boundary treatments or external lighting. However, a contemporary solution may be in keeping with the dominant vernacular in locations that are not very prominent in the streetscene, i.e. the building will not lie at or close to the back of pavement nor will punctuate or terminate a view through the Conservation Area. Contemporary building styles are appropriate in those parts of the village outside the Conservation Area that are formed by generally modern style buildings. The modern requirements for refuse collection should be met within the fabric of the building.</p>
MATERIALS AND CRAFTMANSHIP	
D36F D37F D38F D39F	<p><i>“The colour of Cotswold Stone varies across the District..... and rich honey colours in the North.....”</i></p> <p><i>“There are various styles of walling stone within the Cotswolds. Many higher status buildings are constructed in ashlar stonework. This consists of straight cut, finely tooled blocks of stone, laid to their natural bed, with very tight mortar joints. ”</i></p> <p><i>“More commonly walls are constructed of Cotswold Rubble stone....Many buildings are built up in rougher less worked rubble stone....”</i></p> <p><i>Mortars are traditionally lime based....”</i></p> <p>CONTEXT: In the Conservation Area there is the almost ubiquitous use of Ashlar dressed Cotswold stone or rubble stone dominate for listed buildings and non-listed buildings of a later date that have significant group value in the setting of those listed buildings. There is therefore a very strong uniformity of overall appearance, even though building forms and styles may differ within the vernacular.</p> <p>CODING: Any new infill buildings and proposals for external alterations and extensions, including new or replacement external walls and roofs, should normally be constructed using one or both these materials or those of a similar appearance. Given that all the buildings in the village outside the Conservation Area lie within its setting and have a close visual inter-relationship, this applies in those parts too, although there may be more scope of alternative material palettes.</p>

D42F	<p><i>“Many Cotswold vernacular buildings were rendered historically....”</i></p> <p>CONTEXT: Although there has been some rendering of walls in the Conservation Area, this does not sit well with the historic Cotswold vernacular.</p> <p>CODING: Roughcast or other rendering and lime washing are not appropriate finishes in the Conservation Area but may be used elsewhere in the village.</p>
D44F	<p><i>“Other traditional building materials also make an important contribution to local character. Some red brick is seen.....”</i></p> <p>CONTEXT: There is no use of red brick in the Conservation Area or elsewhere in the village. Its use would be incongruous with the dominant Cotswold vernacular of the Conservation Area and the small size of the village would make this material jar within its setting.</p> <p>CODING: Red brick should not be used as a material for any type of building or structure, including extensions or alterations anywhere in the village.</p>
D45F	<p><i>“From the nineteenth century onwards there is more use of blue-grey Welsh slate, for re-roofing”</i></p> <p>CONTEXT: Cotswold Stone is used as the roofing material for almost every building in the Conservation Area. The use of Welsh slate is rare.</p> <p>CODING: In the Conservation Area, all new or replacement roofs should use Cotswold stone tiles unless the original or main building already has Welsh slate. There should be no replacement of original stone tiles with artificial stone tiles (or blue slate where Welsh slate is in situ). Buildings outside the Conservation Area may use artificial stone tiles or blue slate (as relevant).</p>
D46F	<p><i>“Some use of thatch is also seen in the District.....Plain clay tile is seen in some locations and clay pantiles”</i></p> <p>CONTEXT: Thatch is not used as roofing material in any part of the Character Area. There is no tradition of use of clay tiles or pantiles or wall hanging with tiles. The use of these materials would be incongruous with the dominant Cotswold vernacular and the small size of the village would make this material jar within its setting.</p> <p>CODING: The use of thatch, clay tiles, pantiles or wall hanging with tiles as a roofing materials is not appropriate.</p>

D50F	<p><i>“Even the choice of finishes can make a vast difference to the character and appearance of buildings, such as window and door paint coloursColours should normally be selected from a fairly traditional palette....”</i></p> <p>CONTEXT: Almost all historic buildings share a palette of polite colours for the painting of their windows and doors in the Conservation Area which complement the subtle tones of the Cotswold Stone of buildings. Outside the Conservation Area there is a wider range of paint colours, although the majority of buildings have used the same palette.</p> <p>CODING: The use of primary and other, non-polite colours for painting timber is not appropriate in the Conservation Area. Outside the Conservation Area, any paint colour may be used although the dominant palette is encouraged.</p>
D55F	<p><i>“There are also examples of red brick walls and other boundary treatments....”</i></p> <p>CONTEXT: Boundaries are normally marked with Cotswold Stone walls or hedges often lying behind a mown grass verge in the Conservation Area and elsewhere in the village.</p> <p>CODING: New or replacement boundaries to properties anywhere in the village should be of either Cotswold stone construction or a new or replacement hedge of a type and height that matches others in the Conservation Area, preserving the grass verge, where extant. Existing Cotswold stone walls, and native hedgerows should be preserved, and appropriately maintained and managed, both during and after construction.</p>
SUSTAINABLE DESIGN	
D62F	<p><i>” Sustainable design needs to be responsive to the character of the area and the sensitivities of the site.....”</i></p> <p>CONTEXT: The strength of the character of the Conservation Area is such that contemporary architectural features are likely to detract from that character, especially where very prominent in the streetscene.</p> <p>CODING: As future planning policy requirements are expected to require significant improvements to the carbon performance of all buildings, it is vital that the location and form of additions and alterations to buildings that require planning permission are handled very sensitively. All proposals of this type must demonstrate that their design and location on or around the building have avoided or minimised any harmful visual effects on the Conservation Area of the technical options available.</p>

GREEN INFRASTRUCTURE

D66F	<p><i>High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments.....“</i></p> <p>CONTEXT: Tall mature trees line both sides of the road at both entrances to the village and occupy very prominent positions in the street scene throughout the village, especially at the junction of the main road with Upper Swell House.</p> <p>CODING: It is essential that any necessary proposal for the removal of trees that occupy very prominent positions in the street scene makes provision of the immediate replanting of mature species of the same type at or as close to the existing position as possible. Landscape schemes should not propose new tree planting forward of any existing building line or elsewhere within the plot that may obstruct or disrupt a key view.</p>
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Strategic Environmental Assessment (SEA) for the Stow on the Wold & The Swells Neighbourhood Plan

Environmental Report

February 2023

Quality information

Prepared by	Checked by	Verified by	Approved by
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Revision	Revision date	Details	Name	Position
V1	18 January 2023	First draft for QB review	NH	ONeill Homer (planning consultant on behalf of the QB).
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Non-Technical Summary (NTS)

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Stow on the Wold & The Swells Neighbourhood Plan (SSNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the SSNP is a legal requirement¹. This is a Non-Technical Summary (NTS) of the SEA Environmental Report.

The SSNP is being prepared by the Parish Council in the context of the adopted Cotswold District Local Plan and emerging Local Plan Partial Update. Once 'made' the SSNP will have material weight when deciding on planning applications, alongside the Local Plan

The SSNP SEA will be published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).

Structure of the Environmental Report/ this NTS

SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). In creating a structured approach, SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
 - i.e., in relation to exploring and appraising 'reasonable alternatives' (as prescribed by the SEA Regulations²).
2. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan that is being consulted on.
3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

What is the Plan seeking to achieve?

The SSNP has established the following vision for the neighbourhood area in 2031:

¹ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or, b) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The SSNP was subject to screening in 2019 where Cotswold District Council determined SEA is required.

² The SEA Regulations are not prescriptive as to what constitutes reasonable alternatives but identifies that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes, and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*" considering the plan objectives and geographical scope.

“The unique townscape and environment of Stow and Swell parishes and the AONB have been conserved and enhanced. The community now has a better supply of market and affordable housing of a variety of types to meet its needs, which has led to a higher proportion of young people living in the town. Preventing new homes being used for second homes has also made a difference.

The town’s economy has diversified with new small businesses and home workers, although its tourism appeal remains vital. The Market Square is now less dominated by parking with its public realm being significantly improved. Its public car parks are well used and have encouraged visitors to walk to the Market Square. The town has also benefited from its new community hub building, which has complemented its longstanding community facilities.

The Swells have retained their special rural Cotswolds character. Little has changed but Lower Swell has benefited from improved car parking arrangements for local residents.”

The following four key objectives of the Neighbourhood Plan have been identified to support this vision:

1. To ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced.
2. To ensure that the community has an adequate supply of affordable housing to meet its needs.
3. To secure and develop the town’s economy.
4. To ensure that the community has appropriate infrastructure in terms of health services, community facilities, traffic and parking, public transport, and its green infrastructure.

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes and objectives, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. The SEA framework is presented below.

SEA theme	SEA objective
<i>Biodiversity</i>	<ul style="list-style-type: none"> • Protect and enhance all biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.
<i>Climate change</i>	<ul style="list-style-type: none"> • Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding. • Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area.
<i>Landscape</i>	<ul style="list-style-type: none"> • Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area.
<i>Historic environment</i>	<ul style="list-style-type: none"> • Protect and enhance the significance of the historic environment, heritage assets (both designated and non-designated) and their settings.

SEA theme	SEA objective
<i>Land, soil, and water resources</i>	<ul style="list-style-type: none"> • Ensure the efficient and effective use of land. • Use and manage water resources in a sustainable manner.
<i>Health and wellbeing</i>	<ul style="list-style-type: none"> • Improve the health and wellbeing of residents within the Neighbourhood Plan area.
<i>Population and communities</i>	<ul style="list-style-type: none"> • Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. • Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types, and tenures.
<i>Transportation</i>	<ul style="list-style-type: none"> • Promote sustainable transport use and reduce the need to travel

Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, **Part 1** of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or alternative sites/ growth options.

Specifically, **Part 1** of the report -

1. Explains the process of establishing the reasonable alternatives.
2. Presents the outcomes of assessing the reasonable alternatives.
3. Explains reasons for establishing the preferred option, in light of the assessment.

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- SSNP vision and objectives, particularly the housing objective to ensure that the community has an adequate supply of affordable housing to meet its needs.
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Establishing the reasonable alternatives

The Environmental Report (Chapter 5) explains how reasonable alternatives were established subsequent to the process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

This work identified the following three options:

- Option 1: Allocate Sites 5, 8, and 11 delivering circa. 85 homes (and meet affordable housing targets cumulatively across these sites).
- Option 2: Allocate Sites 6 & 7 as one large strategic site delivering circa. 170 homes (and meet affordable housing targets on-site) and a new community hub and carpark.
- Option 3: Allocate Sites 9 & 10 as one large strategic site delivering circa. 146 homes (and meet affordable housing targets on-site) and a new community hub.

Assessing the reasonable alternatives

The main report (Chapter 6) assesses these options and presents detailed findings for the SEA themes. For each of the options, the assessment examines the likely significant effects on the baseline, drawing on the sustainability themes and objectives established through scoping. Green is used to indicate significant positive effects, whilst red is used to indicate significant negative effects. Where appropriate, uncertainty will also be noted (in grey).

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. Numbers are used to highlight the option or options that are preferred from an SEA perspective, with 1 performing the best.

The following conclusions are reached in the assessment of these options:

Rank and likely significant effects			
SEA theme	Option 1: Sites 5, 8, & 11	Option 2: Sites 6 & 7	Option 3: Sites 9 & 10
Biodiversity	1	1	2
Climate change	=	=	=
Landscape	1	2	2
Historic environment	=	=	=
Land, soil, and water resources	1	2	2
Health and wellbeing	2	1	1
Population and communities	3	1	2
Transportation	2	1	1

Developing the preferred approach

The Parish Council's reasons for developing the preferred approach are:

“Following community consultation and development of the evidence base, including the SEA, the Steering Group identify the preferred option for development at the land northeast of Stow (Option 2), as this option will best meet the vision and objectives to plot a course to a different, more sustainable future and deliver against plan aims for a new community hub and additional carparking. The scheme would secure both market and affordable housing for which there is a need in Stow to shift its demographic profile, economic base and self-sustainability.

Such benefits have not been identified as viable through Option 1, and a community preference for Option 2 over Option 3 has been identified.”

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the Submission version of the SSNP. Assessment findings are presented as a series of narratives under the ‘SEA framework’ topic headings. The following conclusions are reached:

Conclusions

Overall, the appraisal has served to highlight a range of potential effects in implementing the SSNP. Significant negative effects are predicted in relation to the land, soil, and water resources theme, which reflects the permanent loss of greenfield and agricultural land at the proposed site allocation.

Significant positive effects are predicted in relation to the population and communities theme, which reflects the significant delivery of new housing targeted at meeting locally identified needs alongside a new community hub building and improved parking provisions which seek to improve the town centre experience. These efforts, alongside measures to connect development and improve active travel, are also considered likely to lead to minor long-term positive effects in relation to the health and wellbeing SEA theme.

With limited biodiversity constraints in the neighbourhood area and policy measures which seek a 20% biodiversity net gain in new development (higher than the national standard), minor positive effects are also predicted in relation to the biodiversity SEA theme.

The landscape and heritage setting reflect key constraints for development in Stow and the Swells and whilst the SSNP seeks a high-quality, landscape-led approach to development, residual minor landscape impacts are predicted, and uncertainty is noted in relation to historic environment impacts. Recommendations have been made which seek to reduce this uncertainty (see below).

Both minor negative and minor positive effects are concluded in relation to climate change. The SSNP places great emphasis on high-quality design and efficiency standards in development, adopted a ‘zero carbon ready’ approach. However, the lack of direct rail connectivity reduces the potential to improve per capita emissions in the short to medium term and may conflict with the district carbon neutral goals and declared climate emergency to some degree.

The potential for both positive and negative effects in relation to transport are identified. The relatively large-scale site allocation site is likely to impact upon traffic and congestion locally (the extent to which remains uncertain), but wider measures to improve car parking, the town centre public realm, and active travel networks are likely to be more beneficial.

Recommendations

The following recommendations have been made:

- It is recognised that the housing policy provisions could be enhanced with the stated aim that access to affordable housing is prioritised for those with local connections and is to remain affordable housing in perpetuity.
- The large-scale development proposed ultimately has the potential to impact upon the historic environment and the SSNP seeks to mitigate these impacts with a strong focus on high-quality design that is landscape-led and integrates with the historic AONB setting. Whilst this is likely to reduce the significance of effects (supported by wider local and national planning policy) the residual effects **remain uncertain** at this stage. To reduce uncertainty, the SSNP could seek to strengthen the mitigation provided by Policy STOW7 by acknowledging the identified heritage constraints as key design considerations, and by directing development to the northern extent of the site where heritage sensitivities are reduced. Directing development to the northern extent of the site will also reduce the potential for impacts in relation to water quality, given that waterbodies intersect the southern extent of the site.
- It is recognised that the site allocation policy provisions could be enhanced with extended requirements for design features that also improve water efficiency (alongside energy efficiency).

Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

Following consultation, responses received will be considered and the SSNP and SEA Environmental Report will be finalised for submission.

Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the plan will then be subject to a referendum, organised by Cotswold District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for Cotswold, covering the defined neighbourhood area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Cotswold District Council as part of the process of preparing its Annual Monitoring Report (AMR). Predicted significant effects in implementing the SSNP relate to the loss of greenfield and likely high-quality agricultural land, this loss will be recorded by Cotswold District Council and is not expected to increase or change over the plan period. No additional monitoring is therefore proposed.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Stow on the Wold & The Swells Neighbourhood Plan (SSNP).
- 1.2 The SSNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 and in the context of the adopted Cotswold District Local Plan and emerging Local Plan Partial Update. Once 'made' the SSNP will have material weight when deciding on planning applications, alongside the Local Plan.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the SSNP is a legal requirement.³

SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that *"identifies, describes and evaluates"* the likely significant effects of implementing *"the plan, and reasonable alternatives"*.⁴ The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
 4. What has plan-making/ SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
 5. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan.
 6. What happens next?

³ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or, b) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The SSNP was subject to screening in 2019 where Cotswold District Council determined SEA is required.

⁴ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

This Environmental Report

- 1.7 This report is the Environmental Report for the SSNP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.⁵ Each question is answered within a discrete 'part' of the report. However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

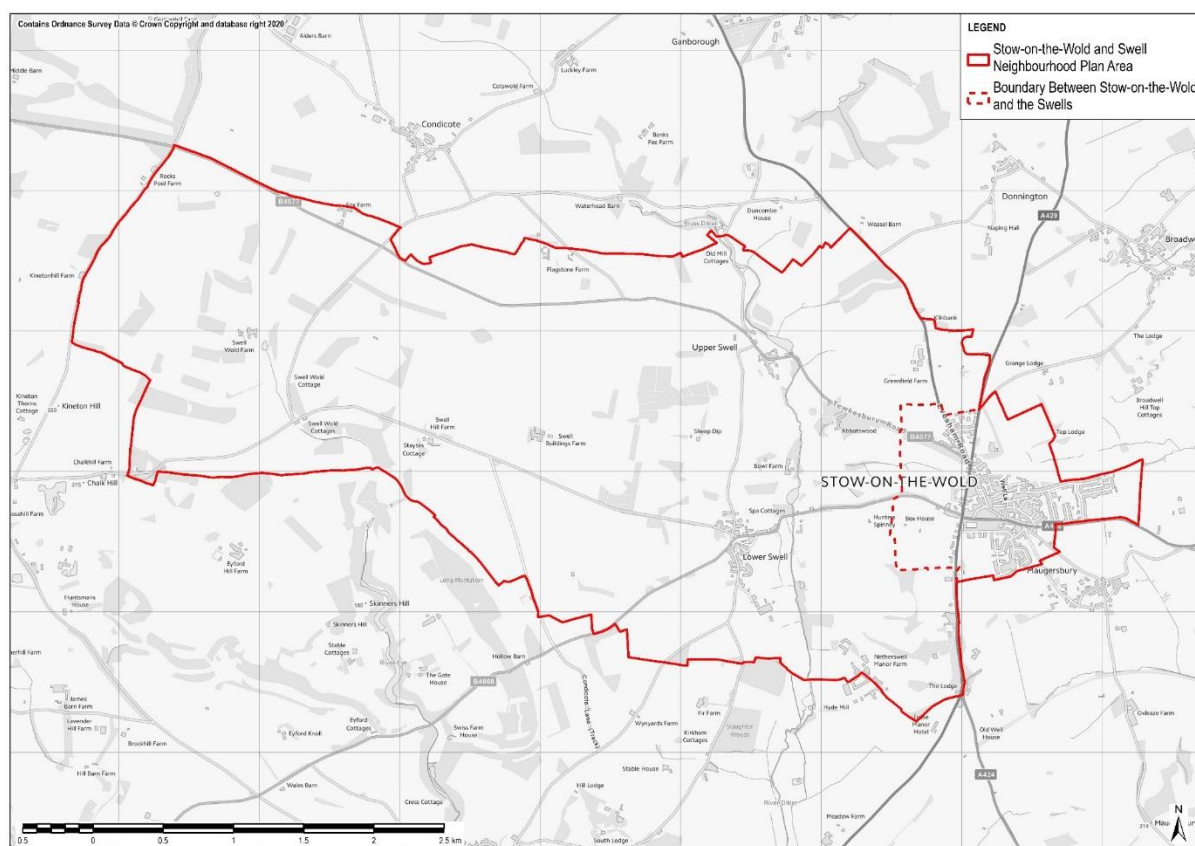
⁵ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Introduction

- 2.1 This section considers the strategic planning policy context provided by the adopted Cotswold District Local Plan and the emerging Local Plan Partial Review, before then presenting the vision and objectives of the SSNP. **Figure 2.1** below presents the neighbourhood area.

Figure 2.1: Stow on the Wold & The Swells neighbourhood area



Strategic planning policy context

- 2.2 The adopted Cotswold District Local Plan identifies Stow on the Wold as a Principal Settlement forming part of the Mid Cotswolds sub-area.
- 2.3 Policy S13 is specific to the town and encourages improvements to community and tourism facilities, particularly supporting the development of a town museum and the provision of a new community facility. The Local Plan further seeks to enhance the town centre, particularly by addressing car parking and congestion problems in the town. Policy SA2 specifically seeks improvements at Unicorn junction (A436/ B4068) in Stow.
- 2.4 The Local Plan does not propose any housing or employment sites for development within the neighbourhood area. Beyond the Principal Settlements, the rest of Cotswold District is essentially considered to comprise open countryside containing rural settlements which are largely not considered to be sustainable locations for further development, though Policy DS3 does

allow for small-scale development within these areas based on certain criteria being met.

- 2.5 The emerging Local Plan Partial Review is at early stages of development, with consultation on 'issues and options' concluding most recently back in March 2022. At this stage, there are no specific proposals in relation to the neighbourhood area in terms of a housing needs figure or development locations.

SSNP vision and objectives

- 2.6 The SSNP has established the following vision for the neighbourhood area in 2031:

"The unique townscape and environment of Stow and Swell parishes and the AONB have been conserved and enhanced. The community now has a better supply of market and affordable housing of a variety of types to meet its needs, which has led to a higher proportion of young people living in the town. Preventing new homes being used for second homes has also made a difference.

The town's economy has diversified with new small businesses and home workers, although its tourism appeal remains vital. The Market Square is now less dominated by parking with its public realm being significantly improved. Its public car parks are well used and have encouraged visitors to walk to the Market Square. The town has also benefited from its new community hub building, which has complemented its longstanding community facilities.

The Swells have retained their special rural Cotswolds character. Little has changed but Lower Swell has benefited from improved car parking arrangements for local residents."

- 2.7 The following four key objectives of the Neighbourhood Plan have been identified to support this vision:

7. To ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced.
8. To ensure that the community has an adequate supply of affordable housing to meet its needs.
9. To secure and develop the town's economy.
10. To ensure that the community has appropriate infrastructure in terms of health services, community facilities, traffic and parking, public transport, and its green infrastructure.

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives.

Consultation

- 3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁶ As such, these authorities were consulted between December 2020 and January 2021. Responses were received from Historic England and Natural England, neither of whom had any specific comments to make. No response was received from the Environment Agency.

The SEA framework

- 3.3 The SEA scope is summarised in a list of themes and objectives, known as the SEA framework. **Table 3.1** presents the SEA framework as consulted upon in early 2021.

⁶ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

Table 3.1: SEA framework

SEA theme	SEA objective
<i>Biodiversity</i>	<ul style="list-style-type: none"> • Protect and enhance all biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.
<i>Climate change</i>	<ul style="list-style-type: none"> • Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding. • Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area.
<i>Landscape</i>	<ul style="list-style-type: none"> • Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area.
<i>Historic environment</i>	<ul style="list-style-type: none"> • Protect and enhance the significance of the historic environment, heritage assets (both designated and non-designated) and their settings.
<i>Land, soil, and water resources</i>	<ul style="list-style-type: none"> • Ensure the efficient and effective use of land. • Use and manage water resources in a sustainable manner.
<i>Health and wellbeing</i>	<ul style="list-style-type: none"> • Improve the health and wellbeing of residents within the Neighbourhood Plan area.
<i>Population and communities</i>	<ul style="list-style-type: none"> • Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. • Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types, and tenures.
<i>Transportation</i>	<ul style="list-style-type: none"> • Promote sustainable transport use and reduce the need to travel

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 Whilst work on the SSNP has been underway for some time, the aim here is not to provide a comprehensive explanation of all the work carried out to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites/ growth options. Land is currently being identified to meet locally identified housing needs, particularly affordable housing needs.

Why focus on growth options?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
- SSNP vision and objectives, particularly the housing objective to ensure that the community has an adequate supply of affordable housing to meet its needs.
 - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
 - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Structure of this part of the report

- 4.4 This part of the report is structured as follows:
- **Chapter 5** - explains the process of establishing reasonable alternatives.
 - **Chapter 6** - presents the outcomes of appraising reasonable alternatives; and
 - **Chapter 7** - explains reasons for selecting the preferred option, considering the appraisal.

5. Establishing reasonable alternatives

Introduction

- 5.1 The aim here is to explain the process that led to the establishment of alternative sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.⁷
- 5.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the SSNP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

Strategic parameters

- 5.3 The adopted Local Plan provides the main strategic framework for the development of the SSNP at this stage, recognising that the emerging Partial Review is still in early stages of development. The Local Plan does not identify any strategic development needs within the neighbourhood area that require meeting over the plan period. Despite this, it does recognise a series of measures that will be supported in Stow, including:
- The development of a museum
 - The development of a new community facility
 - The relocation of car parking from the town centre
 - Improvement to Unicorn junction (A436/ B4068)
 - Small-scale retail/ service development within the town centre
- 5.4 In developing the SSNP, a Housing Needs Assessment (HNA) has also been produced (2022), which identifies that whilst the town has an above average number of affordable homes in its current stock, this still falls short of meeting local affordable housing needs. The HNA estimates a minimum of 37 affordable homes are required over the plan period to 2031.

Site options

- 5.5 A total of eleven potential development sites have been identified through the plan-making process, ten of which are in Stow (but outside of the development boundary) and one is within The Swells; see **Figure 5.1**. The eleven sites were investigated through supporting site assessments⁸, which provided a view as to whether the sites were potentially suitable as allocations in the SSNP. This work found the following two sites as ‘unsuitable for allocation’:
- Site 6 (Land north of Tesco store and behind McCarthy & Stone retirement complex – Hawkesbury Place, Fosseway): this site was considered

⁷ Schedule 2(8) of the SEA Regulations

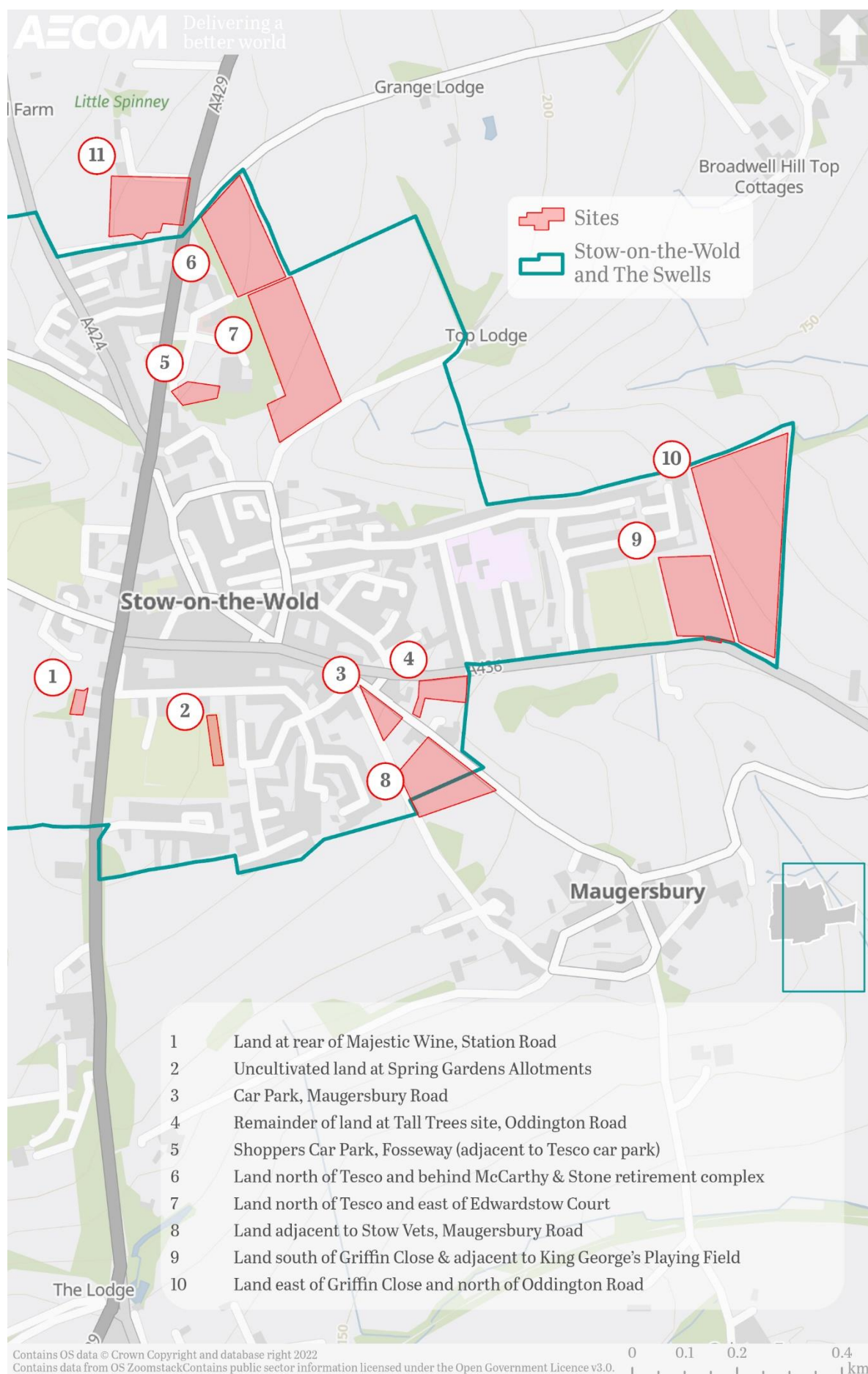
⁸ Undertaken by the NP Steering Group and a standalone assessment of housing potential only.

unsuitable as an allocation due to environmental factors such as impact on AONB landscape and ecology.

- Site 8 (Adjacent to Stow Vets, Maugersbury Road): this site was considered unsuitable as an allocation given the environmental sensitivity of the site and the importance of trees protected by TPOs (Tree Preservation Orders) on-site.

5.6 Of the remaining nine sites, two were found to be 'suitable for allocation' (Site 5 and Site 7) and seven were found to be 'potentially suitable for allocation' subject to mitigation (Sites 1, 2, 3, 4, 9, 10, and 11).

5.7 All sites were consulted upon with the community in March 2020 and were reconsidered to incorporate considerations of the potential to include new community infrastructure (not just housing). Site 6 emerged as the preferred site for development locally, closely followed by Site 7, Site 1, and Site 4. However, it is recognised that the consultation had a relatively low response rate.

Figure 5.1: SSNP site options

Establishing reasonable alternatives

- 5.8 It is recognised that there is the option for the SSNP to not allocate any sites for development. Whilst this option is available to the group, it represents a continuation of the baseline, where no significant deviations from the baseline (i.e., significant effects) would be considered likely. The option has also been assessed by the Local Plan Sustainability Appraisal (SA), as it represents the current adopted approach laid out in the Local Plan. On this basis, the option is not considered to form a reasonable alternative for assessment, given it will add little in terms of considerations for the plan-maker, particularly within this scenario where the plan is seeking to allocate sites for housing development to address a locally identified need for affordable homes.
- 5.9 None of the eleven identified sites are being discounted at this stage, reflecting the community preferences emerging from consultation juxtaposed with the site assessment findings. Clear choices do emerge however, in terms of whether development is directed to small-scale or larger-scale sites. With the aim of delivering affordable housing, it is recognised that sites will need to be of a sufficient scale to deliver a proportion of affordable housing on-site, alongside enabling market housing.
- 5.10 Sites 1-4 are small-scale development sites of less than one hectare. Whilst development could contribute to affordable housing needs on-site, estimating circa. 20 dwellings per hectare, it is unlikely that the outlined affordable housing needs for circa. 40 affordable homes would be met through a package of small sites alone.
- 5.11 Sites 5, 8, and 11 are between 1ha and 1.5ha (medium scale) and would also need to be considered in combination to deliver against the affordable housing needs (recognising the need for enabling market housing alongside). The scale of development across these three sites could cumulatively contribute to meeting the objective to deliver against affordable housing needs and could be considered to form a more realistic alternative to large-scale development at a single site.
- 5.12 Sites 6 and 7, and Sites 9 and 10, lie adjacent to each other and with a single landowner. The sites can be combined to form large-scale (strategic) development sites, that would deliver a significant contribution of affordable housing (likely meeting the identified needs in full and potentially exceeding them). However, these sites would constitute major development within the AONB. Notably, early indicative plans for these large sites were put to the community; see **Figures 5.2 and 5.3**.

Figure 5.2: Early Indicative plan for Sites 6 and 7⁹

Figure 5.3: Indicative plan for Sites 9 and 10

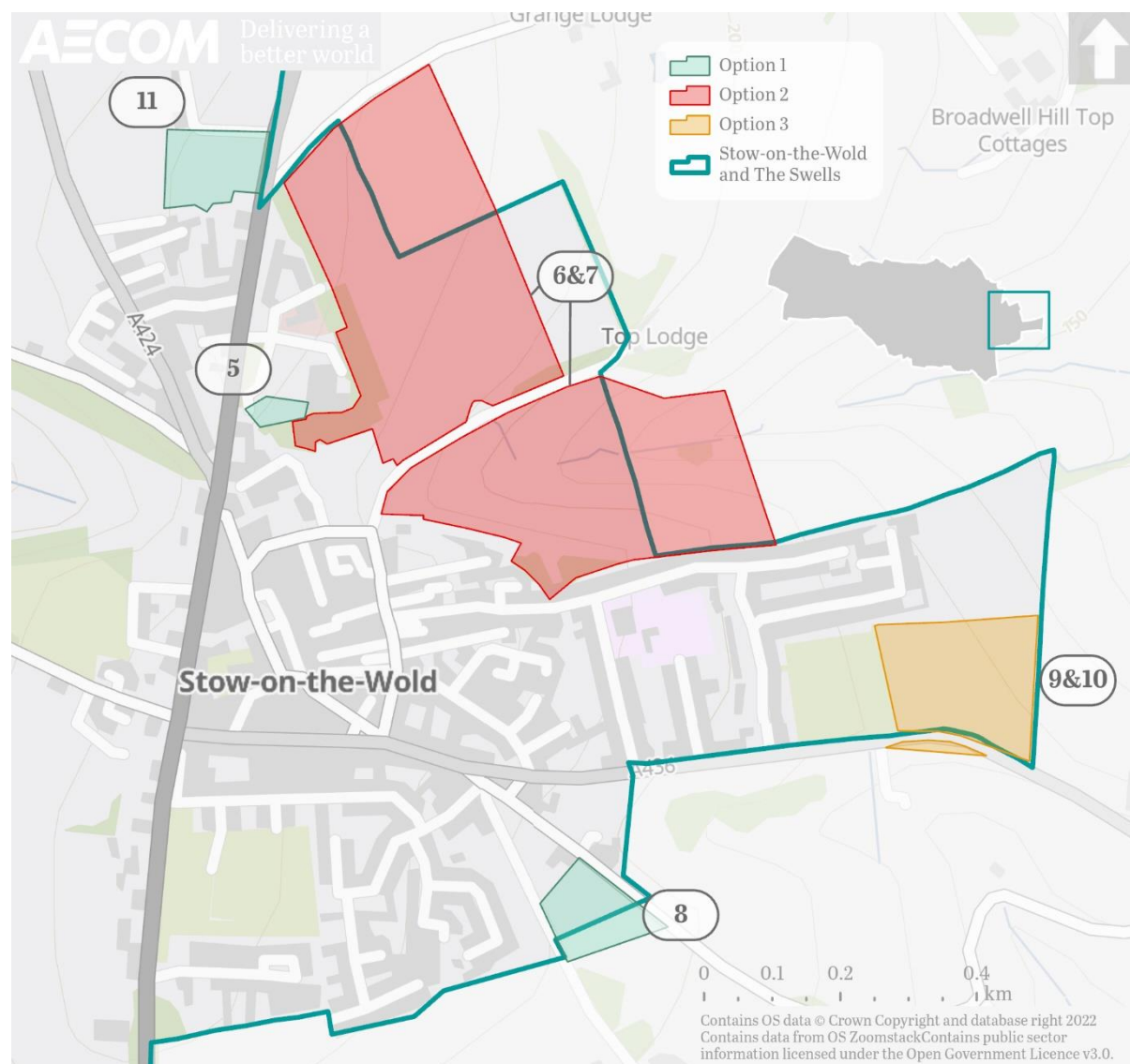
⁹ Plans have since been updated.

5.13 Whilst recognising that there could be multiple permutations of small and/ or medium-sized sites, for assessment purposes medium-sites combined form a logical option for the purpose of informing plan development. The large sites form two separate choices alongside. The alternatives are therefore focused to the following options, see **Figure 5.4** also:

Table 5.1: Alternative options for assessment

Site reference	Size (ha)	Estimated number of homes	Option 1	Option 2	Option 3
Site 5	1.2	circa. 25 homes	Allocate	-	-
Sites 6 & 7 (combined)	24.33/ 6.76*	170	-	Allocate	-
Site 8	1.41	circa. 30 homes	Allocate	-	-
Sites 9 & 10 (combined)	7.41	146	-	-	Allocate
Site 11	1.49	circa. 30 homes	Allocate	-	-
Total Homes			85	170	146

*Residential area of the site

Figure 5.4: Alternative options for assessment

6. Assessing reasonable alternatives

6.1 As outlined in the previous section, the following options are established as alternative options for the purposes of the SEA:

- Option 1: Allocate Sites 5, 8, and 11 delivering circa. 85 homes (and meet affordable housing targets cumulatively across these sites).
- Option 2: Allocate Sites 6 & 7 as one large strategic site delivering circa. 170 homes (and meet affordable housing targets on-site) and a new community hub and carpark.
- Option 3: Allocate Sites 9 & 10 as one large strategic site delivering circa. 146 homes (and meet affordable housing targets on-site) and a new community hub.

Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Significant effects are indicated in red (negative) or green (positive). Where appropriate uncertainty will also be noted with grey shading.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a significant effect, this is made explicit in the appraisal text.
- 6.4 Efforts are also made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of significant effects. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. An 'equals' sign ("=") indicates options are ranked on par with each other and occurs when no significant/ meaningful differences can be drawn between options.
- 6.5 Finally, it is important to note that effects are predicted pre-mitigation (policy-off approach) and considering the criteria presented within Regulations.¹⁰ So, for example, account is taken of the duration, frequency, and reversibility of effects.

¹⁰ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 20004.

Appraisal findings

Table 6.1: Summary appraisal findings

SEA theme	Rank and likely significant effects		
	Option 1: Sites 5, 8, & 11	Option 2: Sites 6 & 7	Option 3: Sites 9 & 10
Biodiversity	1	1	2
Climate change	=	=	=
Landscape	1	2	2
Historic environment	=	=	=
Land, soil, and water resources	1	2	2
Health and wellbeing	2	1	1
Population and communities	3	1	2
Transportation	2	1	1

Biodiversity

- 6.6 None of the options are constrained by internationally designated sites or captured as a potential risk for nearby nationally designated Sites of Special Scientific Interest (SSSIs). There is a network of deciduous woodland Priority Habitats across the neighbourhood area which intersects/ borders Options 1 (Site 5) and 2 around Tesco and south of Shoppers Carpark. The habitat is likely to be retained in development under either option. Option 1 (Site 5) falls within a National Habitat Network Enhancement Zone 2, whilst Option 1 (Sites 8 and 11) and Option 2 fall within a National Habitat Network Expansion Zone. Development under either option has good potential to support network enhancement/ expansion objectives at the sites, which makes them rank marginally more favourably to Option 3 overall. No significant effects are anticipated.

Climate change

- 6.7 With regards to climate change, none of the options lie within an area of high fluvial flood risk and none of the options are constrained by areas of medium or high surface water flood risk on-site. Option 1 (Sites 5 and 8) lies near to areas of low and medium surface water flood risk and may benefit from sustainable drainage systems that provide resilience considering potential future flood risk.
- 6.8 All options are settlement edge options that connect well with the town and its offer with opportunities to promote active travel. Notably, Options 1 (Site 5) and Option 2 provide excellent connections with the supermarket, and Option 3 lies adjacent to King Georges Playing Field and close to Stow's primary school.

- 6.9 Whilst strategic development sites (Options 2 and 3) offer greater potential to deliver climate efficiency measures (through economies of scale) there is no evidence to indicate any particular or significant opportunities at any of the sites or locations under consideration.
- 6.10 Overall, no significant effects are considered likely and there are no significant differences between the options which are judged to perform broadly on par.

Landscape

- 6.11 With regards to landscape impacts all options would deliver development within the AONB. Option 1 includes a brownfield site (Site 5 The Shoppers Carpark) where regeneration of the site could be beneficial for the immediate townscape and the site falls within the settlement boundary. Option 1 (Sites 8 and 11) are settlement expansion sites, where most notably Site 8 lies in the southeast approach to the town from Maugersbury and Site 11 lies on the Fosse Way approach from the north. Development at these sites has the potential to affect entryways/ approaches to the town.
- 6.12 Options 2 and 3 are large-scale (strategic) development sites within the AONB. Option 2 is set back from the main Fosse Road but may affect views into the town from the north. Option 3 lies on the A436 approach into the town from the east.
- 6.13 All sites have the potential to affect gateway locations and views into/ out of the town, as settlement edge locations, and the potential for negative effects of significance under all options is recognised at this stage. Option 1 is preferred to Options 2 and 3 as it includes a brownfield site, and medium-scale developments that have greater chance of integrating with the existing townscape (as opposed to large-scale development) delivering fewer homes overall.

Historic environment

- 6.14 The historic environment is a key sensitivity for any development in the neighbourhood area. Of note, Option 1 (Site 5), and Option 2 adjoin the Conservation Area at Well Lane and lie close to Abbotswood Grade II* Registered Park and Garden. Option 1 (Site 11) lies entirely within the Conservation Area in the south. Option 2 further intersects a Scheduled Monument in the southwest (the prehistoric enclosure known as Stow Camp) and a Grade II Listed Building in the south (St Edward's (Stow) Well), though it is noted that no housing development is being proposed within this area of the site. Option 3 lies further east of the settlement area and is not immediately constrained by designated assets. It is set back from the Conservation Area but visible from the southern extent of the Conservation Area at Maugersbury Park.
- 6.15 Under all options, the potential for negative effects of significance is recognised at this stage (pre-mitigation) given the sensitivity and significance of the assets surrounding (or within) the sites and their settings. None of the sites are ranked more favourably than another at this stage, recognising the sensitivity of each option, and detailed mitigation plans would assist in assessing potential residual effects.

Land, soil, and water resources

- 6.16 All options will result in the loss of greenfield land, and Option 1 is the only option to utilise an element of brownfield regeneration (Site 5) making this option rank most favourably in relation to this SEA theme. Options 2 and 3 are pasture/ arable land in agricultural use and Option 1 (Sites 8 and 11) includes equine grazing land. The options do not intersect waterbodies. The loss of productive agricultural land under all options is considered for potential negative effects of significance.

Health and wellbeing

- 6.17 All options have the potential to support residents with active travel opportunities as settlement edge development sites that connect with existing infrastructure. Option 3 performs notably well by providing future residents with excellent access to the King George Play Park adjacent and the nearby primary school (with good potential to promote walking/ cycling in daily trips) and GP (Stow Surgery).
- 6.18 Whilst recognising that existing footpath connections within and surrounding Stow are limited, all sites under all options could also provide good access to the surrounding countryside.
- 6.19 As strategic development sites, Options 2 and 3 provide good opportunities to support infrastructure development (e.g., new footpaths) and wellbeing features (such as new green spaces) through economies of scale. Notably, these two options have greater potential than Option 1 to deliver against wider plan aims for a new community hub. Significant positive effects are associated with such development benefits. The site under Option 2 also lies adjacent to the supermarket with good potential to promote walking/ cycling in frequent trips. Such benefits are unlikely to be achieved under Option 1 which focuses development at much smaller sites.
- 6.20 Option 1 disperses development more widely across the settlement, with sites in the north (Sites 5 and 11) also connecting well with the supermarket, and the site in the south (Site 8) connecting relatively well with the primary school, open spaces and Stow Surgery.
- 6.21 Overall, significant positive effects are considered more likely under Options 2 and 3 which have good potential to deliver positive health outcomes like new footpaths and open space. For this reason, these options rank more favourably than Option 1 (where no significant effects are anticipated).

Population and communities

- 6.22 All options contribute new housing that will ultimately be targeted at redressing housing stock imbalances and significant positive effects for local communities are anticipated in this respect. The greater the housing contribution, the greater these positive effects are likely to be, and the strategic (large-scale) sites under Options 2 and 3 are considered more likely to contribute significantly in terms of on-site affordable housing provisions.
- 6.23 All sites under all options connect relatively well with the existing settlement area; with sites in the north (Option 1 – Sites 5 and 11, and Option 2) connecting well with the town centre and supermarket, and sites in the south

(Option 1 – Site 8, and Option 3) connecting well with open space, the primary school, and Stow Surgery.

- 6.24 Further of note, the scale of the development sites under Options 2 and 3 provide significantly greater potential to deliver against wider plan aims for additional carparking space and a new community hub. This potential notably increases the significance of the anticipated positive effects and makes these options rank more favourably than Option 1. Option 2 is ranked most favourably due to its potential to deliver both a new community hub and a new carpark centrally.

Transportation

- 6.25 With regards to road traffic impacts there is the argument that the higher the level of development, the greater the road traffic impacts would be. However, this is compared with the argument that strategic development (larger-scale development) has greater potential, through economies of scale, to deliver mitigation and new infrastructure that supports alternatives to the private car.
- 6.26 Option 1 disperses development across medium-scale development sites. Sites 5 and 11 in the north of the settlement provide good access to the supermarket and connect well with the main road through the settlement (the Fosse Way). Bus connections are provided at Tesco and along High Street. Site 8 in the south connects relatively well with the primary school, GP, and open spaces, as well as the A436/ Chapel Street approach into town. Bus stops are nearby at Park Street.
- 6.27 Option 2 performs broadly like other sites in the north of the settlement providing excellent access to the supermarket and bus connections here. Option 3 is further east of the settlement area connecting well with the primary school and GP. Bus connections are provided at the adjacent King George Play Park and further along at Park Street.
- 6.28 Overall, whilst all sites under consideration connect well with the settlement area, negative effects are still considered likely through increased vehicle usage and associated traffic and congestion impacts (exacerbated by through travel and tourism). It is not certain at this stage whether such effects would be significant (thus overall uncertainty is noted), however, it is considered likely that significant effects could be avoided once mitigation measures are factored in. As strategic development sites with greater potential to provide such mitigation (including new carparking connecting with the central area and a new community hub delivering local workspace), Options 2 and 3 are preferred to Option 1.

7. Developing the preferred approach

- 7.1 The Parish Council's reasons for developing the preferred approach considering the alternatives assessment are identified below:

“Following community consultation and development of the evidence base, including the SEA, the Steering Group identify the preferred option for development at the land northeast of Stow (Option 2), as this option will best meet the vision and objectives to plot a course to a different, more sustainable future and deliver against plan aims for a new community hub and additional carparking. The scheme would secure both market and affordable housing for which there is a need in Stow to shift its demographic profile, economic base and self-sustainability.

Such benefits have not been identified as viable through Option 1, and a community preference for Option 2 over Option 3 has been identified.”

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'pre-submission' (draft) version of the SSNP. This chapter presents:

- An appraisal of the current version of the SSNP under the eight SEA topic headings.
- Consideration of potential cumulative effects; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Draft plan policies

8.2 The SSNP puts forward 16 policies to guide development in the neighbourhood area, as identified in **Table 8.1**.

Table 8.1: SSNP policies

Policy reference	Policy name
STOW1	The Stow on the Wold Development Boundary
STOW2	Development in The Swells and the Countryside
STOW3	Housing Mix
STOW4	Principal Residence
STOW5	Specialist Accommodation for Older People in Stow
STOW6	Health and Well Being
STOW7	Land North East of Stow
STOW8	Stow Town Centre & Market Square
STOW9	King George's Playing Field Facilities
STOW10	Local Green Spaces
STOW11	Stow and the Swells Design Code
STOW12	Buildings of Local Importance
STOW13	Zero Carbon Buildings
STOW14	Walking & Cycling in the Town and Parish
STOW15	Vehicle Parking
STOW16	Digital Infrastructure

Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Assessment of the draft plan

Introduction

- 9.1 The draft plan contents, aims, and objectives are summarised, and the assessment is presented under the eight SEA themes established through scoping (see **Table 3.1**). Consideration is also given to cumulative effects. A final section (**Chapter 10**) then presents overall conclusions and any recommendations.

Plan contents, aims, and objectives

- 9.2 Stow on the Wold is an ancient Cotswold market town positioned at the convergence of eight historic trackways (now busy roads). Swell Parish was formed in 1935 by the amalgamation of Upper and Lower Swell, both small villages lying just west of Stow. The neighbourhood area covering both Stow and Swell lies entirely within the Cotswold Area of Outstanding Natural Beauty (AONB), a nationally valued landscape. The River Dikler runs through Upper and Lower Swell (to join the River Windrush) and is prone to flooding. Landscape impacts and flood risk present key environmental challenges for future development in the neighbourhood area.
- 9.3 Many of the buildings in Stow are typified by Cotswold limestone from local quarries, and the historic core of the town is a Conservation Area within which many of the buildings are listed. Stow's architecture and range of independent shops and services continue to attract tourism. There is a recognised local desire to make the historic town square more pedestrian friendly, and the SSNP seeks to address this through additional off-street parking that will reduce the current impact of on-street parking.
- 9.4 With regards to the communities that form the neighbourhood area, the SSNP recognises the proportion of young people (particularly those aged 18 and under) has been declining in recent years, whilst the proportion of older people (aged 65 and over) is significantly increasing. This presents challenges in terms of social and physical infrastructure and achieving a balanced housing mix. This has also been exacerbated by recent developments outside the Stow development boundary, all of which have been restricted to retirement living and have significantly increased the proportion of elderly residents forming the community.
- 9.5 Whilst residents enjoy the countryside setting, this also presents challenges for the community with high levels of second home ownership and/ or holiday rentals that have increased parking pressures and continue to drive up both property and rental values. High property and rental values juxtaposed with low incomes is a key driver behind younger people leaving the area and drives up emissions as many of those who work in Stow commute from the wider area. A key thread to the SSNP is therefore addressing an under-provision of affordable housing (particularly social rented housing) over the plan period.
- 9.6 The SSNP proposes 16 policies focused largely on housing provisions and the location of development (STOW1 – 7), but also supporting the role and function of the town centre and Market Square (STOW8), addressing parking issues and enhancing active travel opportunities (STOW14 – 15), retaining local green

spaces and recreational facilities (STOW9 – 10), and guiding high-quality design in development (STOW11 – 16). Policy STOW7 proposes one key strategic development site at the 'Land North East of Stow' that will deliver 100 market homes and 70 affordable homes.

Biodiversity

- 9.7 Whilst the SSNP proposes a significant development site delivering 170 new homes (Policy STOW7), the neighbourhood area is not constrained by proximity to internationally designated sites, hence why the SSNP was screened out of requiring Habitats Regulations Assessment (HRA) Appropriate Assessment (AA).
- 9.8 With regards to nationally designated biodiversity, again the plan area is not significantly constrained. New Park Quarry SSSI (Site of Special Scientific Interest) lies north of Upper Swell, but residential development is not captured as a potential risk indicator in the identified SSSI Impact Risk Zone intersecting the neighbourhood area.
- 9.9 Grassland and woodland habitats are dispersed across the neighbourhood area, and most notably, woodland habitats intersect the border of the proposed development site in the west and the south. It will be important that these be retained and enhanced. The Living England Habitat Map¹¹ identifies the site is predominantly formed of arable and horticultural land, and the National Habitat Network identifies the whole site as a 'Network Expansion Zone' where the land is considered likely to be suitable for habitat creation and/ or opportunities for connecting and linking up locations across a landscape.
- 9.10 Whilst biodiversity constraints are not considered to be significant, it is recognised that the proposed development provides an opportunity to enhance and expand habitats on-site, linked to existing habitats as part of a Network Expansion Zone and deliver positive effects in this respect. The SSNP captures this opportunity in the policy framework, with Policy STOW7 identifying requirements for 20% demonstrable biodiversity net gain onsite (higher than the emerging national requirement for 10%) and to avoid any loss of existing mature trees and hedgerow on-site (alongside reinstating historic hedgerows). Furthermore, the policy seeks development which replaces non-native tree species with native species. This is in the context of the wider policy framework which seeks high-quality development with integrated health and wellbeing considerations, including access to nature and allotments, native tree planting, and landscaping schemes.
- 9.11 Considering the above, **minor positive effects** are considered most likely in the long-term because of an enhanced effort to deliver biodiversity net gains at the strategic development site and integrate biodiversity considerations into future growth.

Climate change

- 9.12 With regards to climate change, a key consideration for plan-making is accessible development that provides travel choices, including active travel options as a key means to reducing per capita emissions. Whilst it is

¹¹ Available through DEFRA's [Magic Map Application](#)

recognised that the SSNP is delivering more homes than planned for through the adopted Local Plan, the effects on absolute emissions are minimised to some degree through the recognition that Stow has a relatively generous town centre offer which is supported by bus transport connections (with the closest train station outside of the neighbourhood area in Moreton-in-Marsh to the north).

- 9.13 The proposed development site is considered relatively accessible, with excellent connections to the town's supermarket. Bus connections are provided at the supermarket and slightly further afield along the High Street. Policy STOW7 requires an active travel strategy in development proposals at the site that creates new pedestrian routes. Furthermore, a transport strategy is sought that implements road schemes and access improvements specific to the constraints of the location. The site is not located within a fluvial floodplain but does intersect small areas/ a channel of medium and high surface water flood risk in the southern extent of the site. The provisions of national and local planning policy should ensure appropriate onsite drainage systems are delivered that mitigate any potential negative effects and there is not considered a need to repeat this policy in the SSNP.
- 9.14 Wider policy provisions in the SSNP will also support more sustainable transport options. Notably, Policy STOW7, working alongside Policies STOW8 and STOW15, seek to reduce the impact of parking, particularly within the town centre. Coinciding with measures to improve the public realm there is good potential to improve the attractiveness of active travel within and around the central area.
- 9.15 Also of note are the benefits of the provisions of Policy STOW13 which seek 'zero carbon ready' development (echoed in Policy STOW7) where buildings are designed to reduce energy consumption, increase efficiency, and support long-term resilience.
- 9.16 Considering the above, no significant deviations from the baseline are anticipated, however, it is recognised that Stow lacks direct rail access limiting its sustainable transport connections/ offer. Development at the proposed scale may conflict to some degree with Cotswold District Council's climate emergency objectives to become a carbon neutral county by 2045 (with an 80% reduction against a 1990 baseline by 2030) and **minor negative effects** are considered likely in this respect. **Minor positive effects** are also concluded in relation to the policy directions for 'zero carbon ready' development, which will help facilitate future changes.

Landscape

- 9.17 With regards to landscape, it is recognised that any future development in the neighbourhood area is constrained by its location within the Cotswold Area of Outstanding Natural Beauty (AONB). The SSNP works towards a vision that sees the special rural Cotswold character retained and the unique townscape conserved and enhanced, whilst accommodating growth that will support community needs.
- 9.18 The SSNP proposes a large-scale development site in the northeast of the settlement area (Policy STOW7) delivering around 170 new homes across a large stretch of open greenfield land adjoining the settlement edge.

Development at the site is likely to affect views into/ from Stow and potentially views across the wider AONB landscape too. Policy STOW7 requires a design strategy informed by a clear understanding of both the Cotswold and Stow Design Codes (as echoed through the dedicated Policy STOW11) and a layout and landscaping scheme that successfully mitigates the effects of development on the AONB countryside to the east. Specifically, development on-site is also expected to acknowledge the views across the site south-eastwards from Broadwell Lane. Design principles are also laid out for the new carpark and community hub as part of landscape-led design.

- 9.19 Wider plan policies also support an improved townscape with provisions to maintain/ increase active ground floor frontages at Market Square (Policy STOW8), ensure commercial and retail development enhances the special architectural and historic character of the town centre (and Conservation Area) (Policy STOW8), support replacement pavilion facilities at King George's Playing Field (Policy STOW9), protect Local Green Spaces (Policy STOW10), protect the significance of non-designated 'Buildings of Local Importance' (Policy STOW12), and retain the transition to open countryside by identifying development boundaries (Policy STOW1).
- 9.20 Overall, the large-scale greenfield development proposed will ultimately impact upon the existing landscape. However, the provisions of the SSNP seek to minimise this impact, particularly through a landscape-led approach to development underpinned by defined design codes specific to the local area and informed by the AONB Management Plan. As a result, **residual minor long-term negative effects** are concluded as most likely in relation to landscape.

Historic environment

- 9.21 With a wealth of heritage assets in the neighbourhood area, any growth strategy is considered constrained by the special setting of Stow and The Swells, including the land between the settlement areas which forms Abbotswood Registered Park and Garden. Furthermore, there are a wealth of archaeological finds across the neighbourhood area, as reflected by the number and broad spread of designated Scheduled Monuments. Additionally, the neighbourhood area lies adjacent to the Battle of Stow Registered Battlefield in the northeast.
- 9.22 The strategic development site proposed under Policy STOW7 lies northeast of Stow, east of the Hawkesbury Place retirement homes and Tesco supermarket. The southwest border of the site adjoins the Stow-on-the-Wold and Mangersbury Conservation Area and lies near to Abbotswood Registered Park and Garden. The site further intersects a Scheduled Monument in the southwest (the prehistoric enclosure known as Stow Camp) and a Grade II Listed Building in the south (St Edward's (Stow) Well). Whilst the proposed policy framework does not outline these constraints to the site, it is recognised that the designated assets and their settings are afforded protection through the Local Plan and NPPF and there is no need to duplicate such policy intentions within the SSNP. Despite this, it is recommended that the site allocation policy (Policy STOW7) is updated to acknowledge these constraints as key design considerations for proposals. The main way in which the SSNP mitigates the effects of development on the historic environment is through the proposed

local design codes linked through Policy STOW11, where landscape-led design proposals are sought which minimise impacts on the historic character and the designated Conservation Area.

- 9.23 Also of note, the SSNP proposes Policy STOW12 which provides protections for 'Buildings of Local Importance' as identified non-designated assets that contribute to the historic character of the settlement area.
- 9.24 Overall, the large-scale development proposed ultimately has the potential to impact upon the historic environment and the SSNP seeks to mitigate these impacts with a strong focus on high-quality design that is landscape-led and integrates with the historic AONB setting. Whilst this is likely to reduce the significance of effects (supported by wider local and national planning policy) the residual effects **remain uncertain** at this stage. To reduce uncertainty, the SSNP could seek to strengthen the mitigation provided by Policy STOW7 by acknowledging the identified heritage constraints as key design considerations, and by directing development to the northern extent of the site where heritage sensitivities are reduced.

Land, soil, and water resources

- 9.25 A key issue in relation to land and soil resources is the conflicting nature of additional growth and the need to protect greenfield land resources and high-quality soils. Productive agricultural land is a key resource, alongside mineral safeguarded areas, recognising that the settlement overlies key sandstone and limestone mineral resources.
- 9.26 The SSNP proposes one large-scale development site in the northeast of the settlement area formed of arable agricultural land (likely to be of high-quality), the loss of which has the potential for negative effects in relation to soil resources. The mineral safeguarded area is extensive, covering the settlement area, and whilst the site allocation falls within this, it is considered that negative effects are minimised by edge of settlement development (where mineral extraction is unlikely to take place).
- 9.27 In relation to water resources, whilst the development proposed through the SSNP is relatively large-scale, it is likely that effects on water resources will be marginal, recognising that water resources are managed at a catchment scale with management plans in place to deal with a growing population. Efforts to ensure high levels of water efficiency in new development will support water resource management and planning in the long-term, and Policy STOW7 could be enhanced by requiring design features that improve both energy and water efficiency (recognising that the policy currently only refers to energy efficiency).
- 9.28 With regards to water quality, waterbodies associated with Caudwell Brook intersect the southern extent of the site, where measures will need to be included in development to avoid impacts arising. Whilst the provisions of the NPPF and Local Plan provide some protections for water quality (particularly in terms of meeting the Water Framework Directive objectives), it is recognised that Policy STOW7 could be enhanced with appropriate policy wording that protects the quality and function of the waterbodies intersecting the site. Noting that the current developer masterplan for the site includes recreational space in this area of the site, it would be beneficial for the policy to reiterate the need to direct development to the north of the site.

9.29 Overall, given the likely impacts to soil resources and agricultural land, **permanent significant negative effects** are considered likely. It will be for plan-makers to weight these impacts with competing SEA and plan objectives (such as the benefits of affordable housing delivery). It is further recognised that these impacts could be reduced by policy wording that specifically restricts development to a smaller proportion of the site (as indicated in the current masterplan).

Health and wellbeing

- 9.30 A key issue for the neighbourhood area is a recent significant increase in the proportion of elderly residents, with more people relying on high levels of accessibility and inclusivity which reduces isolation.
- 9.31 The SSNP dedicates Policy STOW6 to health and wellbeing factors, recognising that development proposals need to demonstrate their support for positive health outcomes, including by encouraging active lifestyles and travel choices, reducing the impacts of vehicular traffic, incorporating high-quality design principles, and providing connectivity to green infrastructure networks.
- 9.32 The proposed allocation site under Policy STOW7 is targeted at redressing housing imbalances, that will indirectly support demographic imbalances that are a key issue for the neighbourhood area now. Furthermore, the site is located close to key amenities and the policy provisions seek opportunities to encourage active travel and healthy lifestyles, with tenures targeting local needs. Proposals are further required to demonstrate design features that improve energy efficiency and reduce emissions as part of zero/ low carbon development, which can support community wellbeing in the long-term through reduced fuel poverty and increased resilience.
- 9.33 Access to nature is actively sought in development, including at the proposed allocation site, with policies reiterating a need to deliver biodiversity net gains in development and integrate with the wider network of green infrastructure. Additional measures seek to protect and enhance Local Green Space and recreational areas (Policies STOW9 and STOW10) and develop active travel networks (Policy STOW14).
- 9.34 The policy provisions which seek positive health outcomes in future development are considered likely to lead to **minor long-term positive effects** overall.

Population and communities

- 9.35 There are key housing issues facing the communities of Stow and The Swells. There are two recognised issues associated with the housing mix in the neighbourhood area: being, a high level of second homes/ holiday rental homes, and recent developments delivering a significant number of retirement homes. These factors have driven up both property and rental values such that many locals cannot afford to remain in the area. As a result, the proportion of younger residents is continually decreasing, and people who work in Stow generally commute in. Both young people and the local workforce are largely priced out of the local housing market or excluded from recent developments.

- 9.36 The SSNP seeks to address these issues, recognising that the delivery of new affordable homes provides a significant opportunity to redress the housing imbalance. First and foremost, the SSNP seeks a substantial housing development at the 'Land North East of Stow' (Policy STOW7), with 100 open market homes enabling the delivery of an additional 70 affordable homes. Policy STOW3 further seeks a 40% affordable housing proportion onsite in new developments of 6 or more homes on other sites. Policies STOW3 and STOW7 guide the tenure split and size mix of future housing, with an emphasis on social rented housing and 3/ 4-bed homes. The substantial provisions and high percentage requirement in future development is considered likely to support significant positive effects for communities in Stow and The Swells. Despite this, it is recognised that policy provisions could be enhanced with the stated aim that access to affordable housing is prioritised for those with local connections and is to remain affordable housing in perpetuity.
- 9.37 Policy STOW5 seeks to limit the delivery of new specialist accommodation for older people over the plan period and align any further delivery of this housing type with local needs for affordability and locally connected residents. Policy STOW4 further supports these efforts by seeking to place restrictions on new housing development to ensure their occupancy as a 'Principal Residence'; thus, restricting further growth in level of second home ownership in the neighbourhood area. Furthermore, the policy framework, particularly Policies STOW7, STOW11 and STOW13, seek to embed high-quality design principles which will support inclusivity and community cohesion, supported further by policy provisions relating to health and wellbeing (Policy STOW6) and access to local green spaces (STOW10).
- 9.38 The development site 'Land North East of Stow' is also expected to deliver a new public car park and a new community hub building. The hub building will provide access to community shared space and small workspaces, which alongside Policy STOW16 (seeking to improve digital infrastructure) should support communities, SMEs (Small and Medium Enterprises), and homeworking in the neighbourhood area. The additional car parking should also help reduce the impacts of on-street parking in the town centre, which alongside additional measures to improve the town centre public realm (Policy STOW8) and enhance pedestrian and cycle networks (Policy STOW14) should support communities with an enhanced service provision and town centre experience.
- 9.39 Considering these points, in particular the direct efforts to redress housing stock imbalances, **significant long-term positive effects** are predicted.

Transportation

- 9.40 The proposed development through the SSNP (Policy STOW7) connects well with the main A-Road connections through the settlement, but will deliver an additional 170 homes, inevitably increasing traffic and congestion issues to some degree and negative impacts are considered likely as a result. The site is relatively well connected to the town centre however, which will encourage the use of sustainable modes of transport to access key facilities and amenities.
- 9.41 The public car park scheme proposed at the development site 'Land North East of Stow' will provide significant benefits by way of reducing on-street parking and congestion in the town centre. At Market Square it is intended that freed

up parking spaces be given over to public realm improvements (Policy STOW8). Additional measures seek appropriate parking provisions elsewhere across the neighbourhood area (Policy STOW15) and improvements to active travel networks (Policy STOW14). Positive effects are likely to emerge as a result.

- 9.42 Overall, whilst **negative effects** are considered likely because of the large-scale development scheme and associated traffic increases, the extent of these effects remain **uncertain** at this stage (in the absence of appropriate traffic modelling evidence) but it is recognised that traffic and congestion issues within the settlement are exacerbated by through traffic and tourism which are a greater cause for concern than traffic generated by residents. **Minor positive effects** are also considered likely because of efforts to improve parking (and reduce congestion) within the town centre and Market Square.

Cumulative effects

- 9.43 The additional housing provisions of the SSNP will support the district's housing land supply over the plan period and positive cumulative effects are considered likely in this regard.
- 9.44 However, the SSNP will also contribute to the incremental loss of greenfield and agricultural land resources within the district, and this also has wider implications for its AONB setting.

10. Conclusions and recommendations

Conclusions

- 10.1 Overall, the appraisal has served to highlight a range of potential effects in implementing the SSNP. Significant negative effects are predicted in relation to the land, soil, and water resources theme, which reflects the permanent loss of greenfield and agricultural land at the proposed site allocation.
- 10.2 Significant positive effects are predicted in relation to the population and communities theme, which reflects the significant delivery of new housing targeted at meeting locally identified needs alongside a new community hub building and improved parking provisions which seek to improve the town centre experience. These efforts, alongside measures to connect development and improve active travel, are also considered likely to lead to minor long-term positive effects in relation to the health and wellbeing SEA theme.
- 10.3 With limited biodiversity constraints in the neighbourhood area and policy measures which seek a 20% biodiversity net gain in new development (higher than the national standard), minor positive effects are also predicted in relation to the biodiversity SEA theme.
- 10.4 The landscape and heritage setting reflect key constraints for development in Stow and the Swells and whilst the SSNP seeks a high-quality, landscape-led approach to development, residual minor landscape impacts are predicted, and uncertainty is noted in relation to historic environment impacts. Recommendations have been made which seek to reduce this uncertainty (see below).
- 10.5 Both minor negative and minor positive effects are concluded in relation to climate change. The SSNP places great emphasis on high-quality design and efficiency standards in development, adopted a 'zero carbon ready' approach. However, the lack of direct rail connectivity reduces the potential to improve per capita emissions in the short to medium term and may conflict with the district carbon neutral goals and declared climate emergency to some degree.
- 10.6 The potential for both positive and negative effects in relation to transport are identified. The relatively large-scale site allocation site is likely to impact upon traffic and congestion locally (the extent to which remains uncertain), but wider measures to improve car parking, the town centre public realm, and active travel networks are likely to be more beneficial.

Recommendations

10.7 The following recommendations have been made:

- It is recognised that the housing policy provisions could be enhanced with the stated aim that access to affordable housing is prioritised for those with local connections and is to remain affordable housing in perpetuity.
- The large-scale development proposed ultimately has the potential to impact upon the historic environment and the SSNP seeks to mitigate these impacts with a strong focus on high-quality design that is landscape-led and integrates with the historic AONB setting. Whilst this is likely to reduce the

significance of effects (supported by wider local and national planning policy) the residual effects **remain uncertain** at this stage. To reduce uncertainty, the SSNP could seek to strengthen the mitigation provided by Policy STOW7 by acknowledging the identified heritage constraints as key design considerations, and by directing development to the northern extent of the site where heritage sensitivities are reduced. Directing development to the northern extent of the site will also reduce the potential for impacts in relation to water quality, given that waterbodies intersect the southern extent of the site.

- It is recognised that the site allocation policy provisions could be enhanced with extended requirements for design features that also improve water efficiency (alongside energy efficiency).

Part 3: What are the next steps?

11. Next steps

11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

11.2 Following consultation, responses received will be considered and the SSNP and SEA Environmental Report will be finalised for submission.

11.3 Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

11.4 If the examination leads to a favourable outcome, the plan will then be subject to a referendum, organised by Cotswold District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for Cotswold, covering the defined neighbourhood area.

Monitoring

11.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

11.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Cotswold District Council as part of the process of preparing its Annual Monitoring Report (AMR). Predicted significant effects in implementing the SSNP relate to the loss of greenfield and likely high-quality agricultural land, this loss will be recorded by Cotswold District Council and is not expected to increase or change over the plan period. No additional monitoring is therefore proposed.

Appendices

Appendix A Regulatory requirements

As discussed in **Chapter 1**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA-1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA-2** explains this interpretation. **Table AA-3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA-1 Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations... the Environmental Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table AA-2: Questions answered by this Environmental Report, in-line with regulatory requirements

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What are the key issues & objectives?</i>	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table AA-3: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are, and/ or will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix B presents key messages from the context review. With regards to explaining " <i>how...considerations have been taken into account</i> ", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on issues and options. Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in light of alternatives assessment).

Regulatory requirement	Discussion of how requirement is met
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
The SA Report must be published alongside the Draft Plan, in accordance with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the 'pre-submission' version of the SSNP, with a view to informing Regulation 14 consultation.
The SA must be considered, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.

Stow on the Wold and the Swells Neighbourhood Plan

Housing Needs Assessment (HNA)

March 2022

[NA Name] Neighbourhood Plan Housing Needs
Assessment

Quality information

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V4	11.03.22	Final draft following review by Hannah Barter, UVE	PA	Paul Avery	Principal Housing Consultant

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List of acronyms used in the text:

CDC	Cotswold District Council
DLUHC	Department for Levelling Up, Housing and Communities (formerly MHCLG)
HNA	Housing Needs Assessment
HRF	Housing Requirement Figure (the total number of homes the NA is expected to plan for, usually supplied by LPAs)
HLIN	Housing Learning and Improvement Network
HRP	Household Reference Person
LHN	Local Housing Need
LPA	Local Planning Authority
NA	Neighbourhood Area
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PRS	Private Rented Sector
RQ	Research Question
SHMA	Strategic Housing Market Assessment
VOA	Valuation Office Agency

1. Executive Summary

Conclusions- Tenure and Affordability

The Neighbourhood Area (NA), which is comprised of Stow on the Wold and the Swells parishes, has a higher proportion of social rented and lower proportion of private rented occupancy than both local and national averages. The proportion of owned households is very close to the local and national average. Overall, this is an interesting tenure mix for the NA's geography and particularly demonstrates a healthier supply of social housing than would be expected, albeit a supply of social housing that needs to be substantially increased to meet local housing needs. An additional key factor to consider in the NA is the proportion of second homes, which accounts for a substantial 17% of housing stock. This is having a significant impact on the availability of tenures in the area and consequently housing affordability.

The data on house prices shows an overall trend of high price growth, with mean prices having increased 35% between 2011 and 2020 and the more useful metric of median prices having increased 15% between 2011 and 2020. The high divergence between mean and median growth can be explained by the increase of exceptionally expensive property sales over time which skews the mean above the median. There is also a large gap between the lower quartile and the median, demonstrating that a notable proportion of properties in the NA remain considerably cheaper than average. In 2020, lower quartile property prices were £295,000 in comparison with a median of £375,000, a difference of £80,000.

Prices have tended to follow a trend line except for a considerable drop in 2018 which was more than recovered in 2019. Upon inspecting the land registry entries for 2018, it appears that the sales of many homes in the Hawkesbury Place development had the effect of reducing average prices in that year.

Detached houses had much more rapid price growth than other types at 58%, adding to the data signal that the largest and most expensive properties are leading price growth. Semi-detached properties also had considerable growth at 31%. Terraced properties had the lowest price growth of just 5%. Flats were closer to the overall average at 12%.

Thinking about housing for purchase on the open market, it appears that local households on average incomes are unable to access even entry-level homes unless they have the advantage of a very large deposit. Market housing, even with the benefit of a higher than average income, is likely to remain out of reach to most. The median house price would require an annual income 56% higher than the current average, and an entry-level house price would require an annual income 43% higher. This demonstrates that the NA has severe issues with housing affordability.

Private renting is generally only affordable to higher than average earners. Households made up of two lower quartile earners cannot afford the given rental thresholds. Affordability is improved if households are able or willing to dedicate a larger proportion of their incomes to rental costs, although this has repercussions for other quality of life aspects and cannot be assumed to suit all individuals' circumstances.

There is a relatively large group of households in Stow on the Wold and the Swells who may be able to afford to rent privately but cannot afford home ownership. They are typically earning between around £50,949 per year (at which point entry-level rents become affordable) and £75,857 (at which point entry-level market sale homes become affordable). This 'can rent, can't buy' cohort may benefit from the range of affordable home ownership products such as First Homes and shared ownership.

This report has estimated the income required to afford First Homes and tested the implications of 30%, 40% and 50% discount levels. Even the 50% discount level would only marginally bring average earner households within reach of being able to afford a home, and is unfortunately not in reach of dual lower quartile earner households. There is certainly evidence to require the maximum 50% discount level in the case of the NA, but owing to the extent of affordability issues, this will only just bring average earners within reach of home ownership.

Affordable rented housing is generally affordable to households with two lower earners depending on their household size (average earning households are unlikely to be eligible). However, households with a single lower earner appear unable to afford any of the tenures considered including the smallest socially rented units. Many such individuals will, if unable to secure a social rented dwelling require additional subsidy through Housing Benefit to access housing.

The evidence in this chapter suggests that the affordable rented sector, and especially social rent, performs a vital function in Stow on the Wold and the Swells as the only option for a large segment of those in the greatest need.

A key issue the Neighbourhood Plan group feel needs addressing, which is supported by CDC, is the need to ensure there is a mixed demographic to maintain the sustainability of the community. Given recent trends show an increase in older people, it will be essential for social rented dwellings to be delivered in the NA to allow younger people and families to move to or stay in the local area.

Turning to the quantity of affordable homes needed, the first source of analysis is the most recent LHNA, produced for the six Gloucestershire local authorities in 2020. The LHNA identifies the need for 125 additional affordable homes each year in Cotswold District as a whole, for the period 2021 - 2041. The report breaks this down to a need for 56 social rent homes a year, 18 affordable rent homes a year and 51 affordable home ownership product homes a year.

When the LHNA figures are pro-rated to Stow on the Wold and the Swells based on its fair share of the population (2.93% of the LPA's population), this equates to 4 homes per annum (rounded) or 37 homes over the Neighbourhood Plan period (2021-2031). Following the LHNA distribution of need by affordable sub-tenure, this would indicate 17 homes for social rent, 5 homes for affordable rent, therefore 22 rented homes in total, and 15 affordable owned homes over the plan period. This can be summarised as a tenure split of 59% affordable rent (of which 45% social and 14% other affordable rent) and 41% affordable home ownership.

When testing our own models of the need for affordable homes by rent and as home ownership products, it appeared that the need was skewed towards home ownership products. It is observed that the strong rate of re-lets in the affordable rent stock is concealing the level of affordable rented need, and the very small amount of affordable home ownership homes in the NA currently is inflating affordable home ownership need. Whilst this imbalance should be redressed, it should not be done so by restricting the supply of affordable rented properties.

Affordable rented homes also require much lower income thresholds and reach those on dual lower quartile incomes. As discussed, even First Homes at 50% discount level only just reach average earner households. In cases such as these, it is generally best practice to prioritise reaching the most households, and affordable rented homes extend affordability to many lower income households. The greatest priority for the NA going forward is greater supply of social rent homes, as these will meet the needs of the greatest number of people living locally, as well as ensure that a mixed demographic is retained in the area, a key aim of the Neighbourhood Planning group.

Therefore, having run independent models of affordable housing need, it is concluded that reverting to the LHNA mix is the best solution for the Neighbourhood Plan. This approach of 59% affordable rent, of which 45% social rent, and 41% affordable home ownership will help foster a more balanced tenure mix whilst also ensuring that the needs of those households in greatest need are prioritised.

In terms of our recommendations for the detailed breakdown of tenure mix, we recommend a 30% share of First Homes, offered at the maximum 50% discount rate. First Homes will help to attract young first time buyers and address the aims of the Town Council to ensure a sustainable mixed demographic in the community. In the interests of diversity and maximizing choice, a further 11% is then allocated to shared ownership rather than more First Homes. Shared ownership has the advantage of requiring a smaller deposit and may therefore be useful to some households. Rent to buy does not feature in the recommended mix as market rents are not affordable to average income households locally. The breakdown of affordable housing for rent follows the LHNA recommended split, with 45% as social rent and 14% affordable rent.

Conclusions- Type and Size

This study provides an indication of the likely need for different types and sizes of homes based on demographic change. It is important to remember that other factors should be considered in determining the dwelling mix that is desirable in the parish or on any particular site. These include the specific characteristics of the nearby stock of housing (such as its condition and design), the role of the NA or site within the wider housing market area (linked to any Local Authority strategies or plans) and site-specific factors which may justify a particular dwelling mix.

There are some very positive aspects to the housing mix in the NA, and some concerning demographic indicators which reflect the heightened affordability issues in the NA. At first glance, the figures indicate that the NA has a well-balanced mix of dwelling types, unusually for a rural area. This includes a substantial number of flats. In terms of size, the NA has a very well-balanced distribution of sizes, offering a great deal of choice, and seems to have avoided the overrepresentation of very large homes which can occur in rural areas.

In terms of changes, it does appear the population is ageing quite quickly, from an already much older population profile than would be expected nationally or at the district level, it is particularly worth noting the increase of 65-84 year olds over the last decade. Concurrently, there has been a fall in the 0-15 and 25-44 age categories as a proportion of population, and also in raw numbers. The fall of 25-44 year olds from 458 to 329 between 2011 and 2020 is concerning because this comprises the bulk of families with children, indicating further future demographic imbalances.

The data indicates that young families are leaving the area and are being priced out by the lack of affordable homes. The proportion of population aged 65 and over is very high, and this has significant implications. The NA will need to attract more young couples and families to ensure more of a balanced age structure.

Under-occupancy is very high in the NA, especially among over 65 households and under 65 households without children. The level of under-occupancy is extremely high for families over 65, with 71% having two surplus bedrooms. This suggests the housing stock is being very inefficiently occupied. 61% of families without children have two surplus bedrooms. Meanwhile, rates of occupancy remain slightly lower among single households over 65, and much lower for families with children, although actually the majority have at least one spare bedroom.

The Census 2011 suggests that there is a high level of second homes in the NA a total of 236, accounting for 17% of the housing stock. This rate may have also increased since 2011 and the forthcoming census data will provide a clearer picture on this.

An increase in second home ownership can often be associated with increasing affordability challenges, which are apparent in the NA as outlined in Chapter 4. It is possible to apply

principle residence restrictions to development in the parishes (or neighbourhood area as a whole) if, in the 2021 or 'latest' Census, a certain proportion of housing that is not usually occupied is exceeded, or if a certain rate of increase is observed on the 2011 figures. What those thresholds might be should be determined with reference to the evidence underpinning adopted policies in nearby or similar neighbourhood plans.

Our life-stage modelling suggests that a split of 17% 2-bed, 33% 3-bed, 34% 4-bed and 16% 5-bed homes would be suitable to help best meet needs of the plan period. This will provide more homes suitable for families with children, which are a key demographic to ensure that the population of the NA does not age as rapidly as it has in recent years.

Conclusions- Specialist Housing for the Older People

The NA has a relatively high amount of existing specialist housing, with 251 units, of which 187 have on-site care provision. However, the NA is also forecast to have significant growth in the population aged over 75, with 203 additional individuals over the plan period, meaning a total population aged over 75 of 643. At present, there are 570 units per 1,000 population aged 75+ but without any additional provision, this would fall significantly to 390 units per 1,000 population.

The potential need for specialist housing with some form of additional care for older people can be estimated by bringing together data on population projections, rates of disability, and what tenure of housing the current 55-75 cohort occupy in the NA. This can be sense-checked using a toolkit based on national research and assumptions.

These two methods of estimating the future need in Stow on the Wold and the Swells produce a range of 51 to 70 specialist accommodation units that might be required during the Plan period. These estimates are based on the projected growth of the older population, thereby assuming that today's older households are already well accommodated. If this is found not to be the case, it would justify aspiring to exceed the range identified here.

This can be broken down to a recommendation for between 14 and 28 housing with care units, and 36 to 42 units of retirement housing.

There is a key consideration to take into account, which is the Neighbourhood Plan's goal for a sustainable mixed demographic in the community as a wider goal. We suggest that provision of specialist housing for older people will help to reduce demand on the conventional housing stock and thereby improve the availability of homes for younger buyers.

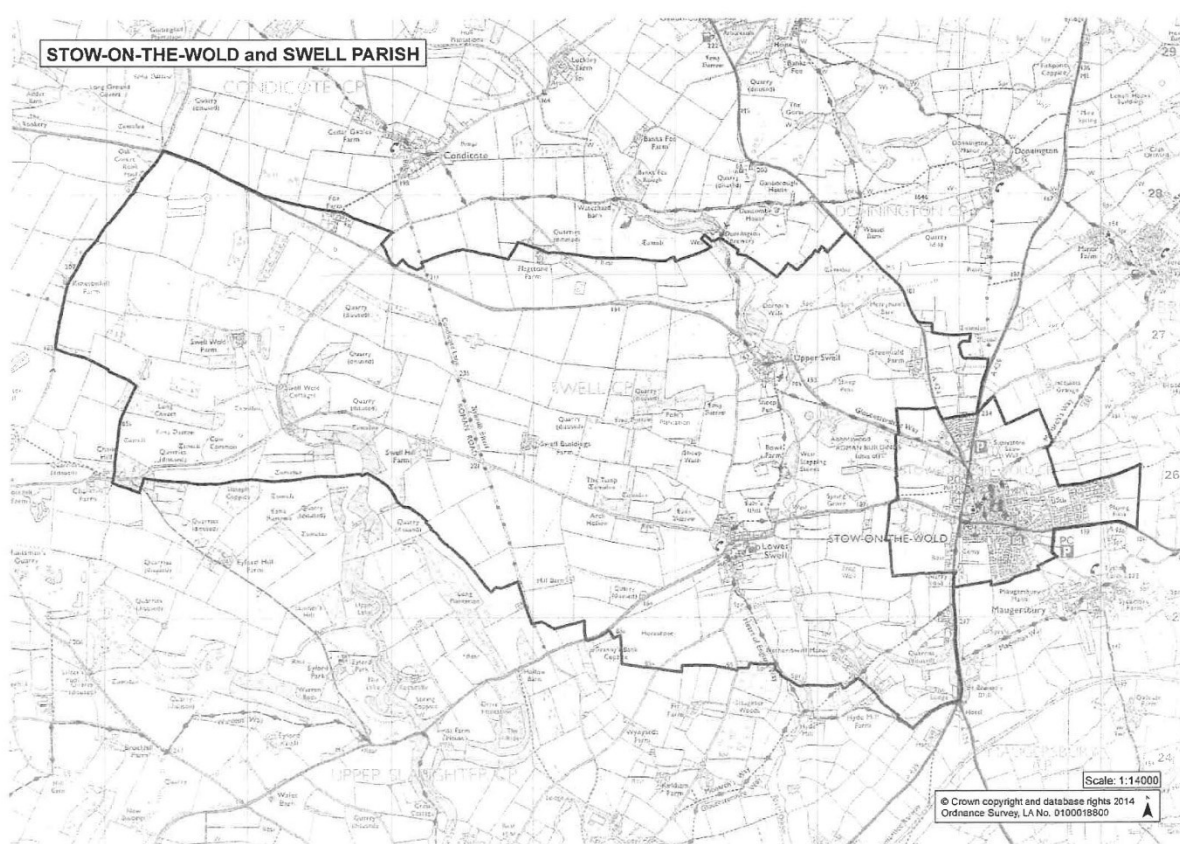
2. Context

Local context

1. Stow on the Wold and the Swells is a Neighbourhood Area located in the Cotswold District, Gloucestershire. The Neighbourhood Area (NA) boundary covers two parishes, Stow on the Wold and the Swells, and was designated on 9 April 2015. The NA previously just covered Stow on the Wold parish and this was designated on 6 September 2012, before later being expanded to cover the Swell parish.
2. The proposed Neighbourhood Plan period starts in 2021 and extends to 2031, therefore comprising a planning period of 10 years. The evidence supplied in this report will look forward to the Plan end date of 2031, but where possible will also provide annualised figures which can be extrapolated to a different term if the Plan period changes.
3. The Neighbourhood Area covers the town of Stow on the Wold and a large rural hinterland to its west, including the villages of Upper Swell and Lower Swell and a scattering of farmsteads and isolated dwellings. Stow on the Wold is a very historic town and lies on the Roman Fosse Way (A429). It plays a role as a key service centre for the surrounding rural part of the Cotswolds. In terms of transport links, Stow on the Wold is connected to Moreton-in-Marsh to the north and Cirencester and A40 to the south by the A429, Evesham by the A424 and A44 to the north-west and Burford and A40 by the A424 to the south-east, and by A436 to Chipping Norton. The Swells parish is rural and has two small villages, Upper Swell and Lower Swell alongside a large area of agricultural countryside.
4. Stow on the Wold once had its own railway station, but since the line was closed, the nearest stations are at Moreton-in-Marsh or Kington, providing links to Oxford, Worcester and onto the Midlands and South-East. A regular bus service provides links to Cheltenham and Moreton-in-Marsh. There are also semi-regular services to Cirencester and surrounding villages. Geographically, Moreton-in-Marsh is located 4 miles north, Chipping Norton 9 miles east, Burford 13 miles south and Cirencester 20 miles south-west.
5. The data source for the NA is the two parishes of Stow on the Wold and the Swell parish which correspond to the NA exactly.
6. The statistics show that in the 2011 Census the NA had a total of 2,431 residents, formed into 1,151 households and occupying 1,387 dwellings. The Office for National Statistics (ONS) produces mid-year population estimates for parishes and wards throughout the country. The mid-2020 population estimate for Stow on the Wold and the Swells is 2,278 – indicating population decline of around 153 individuals since 2011. It is worth noting that this figure is an estimate only, based on data which is mostly available at local authority level such as administrative registers of births and deaths, data on moves between local authorities, small-area population estimates and official population projections, and not based on a survey count.

7. According to completions data gathered by Cotswold District Council 167 dwellings were added between 2011 and 2020 in the NA. This means that we can now estimate that there are approximately 1,554 dwelling. There are 96 commitments in the pipeline, which when completed will mean a forecast total of 1,650 dwellings. The population of the NA has fallen according to ONS estimates despite the concurrent increase in the number of dwellings. This is atypical, but can be explained by changing household structures, e.g. more individual and fewer family households, increasing second home-ownership, or both. It may also be a consequence of the method used in the ONS estimates, which draws more on Local Authority than truly localised data. A map of the Plan area appears below in Figure 2-1.

Figure 2-1: Map of the Stow on the Wold and the Swells Neighbourhood Area¹



Source: Cotswold District Council

¹ Available at <https://www.cotswold.gov.uk/planning-and-building/planning-policy/neighbourhood-planning/neighbourhood-plans-in-development/>

Planning policy context

8. Neighbourhood Plans are required to be in general conformity with strategic policies of the adopted local plan.² In the case of Stow on the Wold and the Swells, the relevant adopted Local Plan for the Cotswold District consists of:
 - Cotswold District Local Plan (2011 to 2031)³, adopted 3 August 2018.
9. Note the Council are partially updating the Local Plan. Informal engagement is anticipated shortly with publication of a pre-submission draft in the latter part of 2022.

Policies in the adopted local plan

10. Table 2-1 below summarises adopted Local Plan policies that are relevant to housing need and delivery in Stow on the Wold and the Swells.

Table 2-1: Summary of relevant adopted policies in the Cotswold District Local Plan (2011 to 2031)

Policy	Provisions
Policy DS1: Development Strategy	Sufficient land will be allocated to deliver at least 8,400 dwellings, together with completions and commitments, and 24 hectares of B class employment use over the plan period 2011 – 2031, including in the Principal Settlement of Stow on the Wold. As of 1 April 2017, the district had 7.6 years' supply available expressed as number of years against the residual requirement.
Policy DS2: Development within Development Boundaries	Within the Development Boundaries indicated on the Policies Maps, applications will be permissible in principle.
Policy DS3: Small-Scale Residential Development in Non-Principal Settlements	<ol style="list-style-type: none"> 1. In non-Principal Settlements, small-scale residential development will be permitted provided it: <ol style="list-style-type: none"> a. demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally; b. is of a proportionate scale and maintains and enhances sustainable patterns of development; c. complements the form and character of the settlement; and d. does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the Local Plan period. 2. Applicants proposing two or more residential units on sites in non-Principal Settlements should complete a rural housing pro-forma and submit this with the planning application.

² A description of the Basic Conditions of Neighbourhood Planning is available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

³ Available at <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-2011-to-2031/>

Policy	Provisions
Policy DS4: Open Market Housing Outside Principal and Non-Principal Settlements	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.
Policy S13: Stow on the Wold	The development of a town museum to support the tourism economy is supported in principle. The provision of a new community facility is proposed.
Policy H1: Housing Mix and Tenure to Meet Local Needs	<ol style="list-style-type: none"> 1. 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. Developers will be required to comply with the Nationally Described Space Standard. 2. Any affordable accommodation with two or more bedrooms will be expected to be houses or bungalows unless there is a need for flats or specialist accommodation. 3. Proposals of more than 20 dwellings will be expected to provide 5% of dwelling plots for sale as serviced self or custom build plots unless demand identified on the Local Planning Authority's Self-Build and Custom Register, or other relevant evidence, demonstrates that there is a higher or lower level of demand for plots. 4. Starter Homes will be provided by developers in accordance with Regulations and National Policy and Guidance. 5. Exception sites on land that has been in commercial or industrial use, and which has not currently been identified for residential development, will be considered for Starter Homes.
Policy H2: Affordable Housing	<ol style="list-style-type: none"> 1. All housing developments that provide 11 or more new dwellings (net) or have a combined gross floorspace of over 1,000sqm will be expected to contribute towards affordable housing provision to meet the identified need in the District and address the Council's strategic objectives on affordable housing. 2. In rural areas, as defined under s157 of the Housing Act 1985, all housing developments that provide 6 to 10 new dwellings (net) will make a financial contribution by way of a commuted sum towards the District's affordable housing need subject to viability. Where financial contributions are required payment will be made upon completion of development. 3. The affordable housing requirement on all sites requiring a contribution, subject to viability is: <ol style="list-style-type: none"> i. Up to 30% of new dwellings gross on brownfield sites; and ii. Up to 40% of new dwellings gross on all other sites. 4. In exceptional circumstances, consideration may be given to accepting a financial contribution from the developer where it is justified that affordable housing cannot be delivered on-site, or that the District's need for affordable housing can be better satisfied

Policy	Provisions
	<p>through this route. A financial contribution will also be required for each partial number of affordable units calculated to be provided on site.</p> <p>5. The type, size and mix, including the tenure split, of affordable housing will be expected to address the identified and prioritised housing needs of the District and designed to be tenure blind and distributed in clusters across the development to be agreed with the Council. It will be expected that affordable housing will be provided on site as completed dwellings by the developer, unless an alternative contribution is agreed, such as serviced plots.</p> <p>6. Where viability is questioned or a commuted sum is considered, an “open book” assessment will be required. The local planning authority will arrange for an external assessment which will be paid for by the developer.</p>
Policy H4: Specialist Accommodation for Older People	<p>Proposals for specialist accommodation for older people, including sheltered and extra care housing, care homes and other appropriate models of accommodation for the elderly and those with particular needs, will be permitted provided that the development:</p> <ul style="list-style-type: none"> a. meets a proven need for that type of accommodation; b. is designed to meet the particular requirements of residents with social, physical, mental and/or health care needs; c. is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and their visitors; and d. where accommodation is provided on a freehold or leasehold basis, it should provide affordable housing in accordance with Policy H2. <p>This includes proposals for self-contained units of accommodation within a residential institution (use class C2). In the case of sheltered accommodation and extra care accommodation a mix of tenures will be encouraged. Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement.</p>

Source: Cotswold District Council

Quantity of housing to provide

11. The NPPF 2021 (paragraphs 66 and 67) requires Local Authorities to provide neighbourhood groups upon request with a definitive or an indicative number of houses to plan for over the Neighbourhood Plan period.
12. Cotswold District Council has fulfilled that requirement by providing Stow on the Wold and the Swells with a definitive figure of no dwellings to be accommodated within the Neighbourhood Area by the end of the Plan period.⁴ This is because the Local Plan has already identified how to meet the district’s housing needs through completions, commitments, allocations and other supply including windfall development. However, the

⁴ As confirmed by the adopted Local Plan.

Council has indicated that it supports the Stow on the Wold and the Swells Neighbourhood Plan bringing forward housing based on the level of local affordable housing need, which this assessment will determine.

3. Approach

Research Questions

13. The following research questions were formulated at the outset of the research through discussion with the Stow on the Wold and the Swells Neighbourhood Plan Steering Group. They serve to direct the research and provide the structure for the HNA.

Tenure and Affordability

14. The neighbourhood planning group would like to understand the needs of the community for housing of varying tenures, as well as the relative affordability of those tenures that should be provided to meet local need now and into the future.
15. This evidence will allow Stow on the Wold and the Swells to establish the right conditions for new development to come forward that is affordable, both in the broader sense of market housing attainable for first-time buyers, and as Affordable Housing for those who may be currently priced out of the market.
16. The neighbourhood planners are interested in exploring the need for Affordable Housing for sale (also known as affordable home ownership) and are therefore eligible for support under the Affordable Housing for sale element of the Neighbourhood Planning Technical Support programme. Analysis and commentary on this issue has been provided where relevant and possible in the HNA.

RQ 1: What quantity and tenures of Affordable Housing should be planned for over the Neighbourhood Plan period?

Type and Size

17. The neighbourhood planning group is seeking to determine what size and type of housing would be best suited to the local community.
18. The aim of this research question is to provide neighbourhood planners with evidence on the types and sizes needed by the local community. This will help to shape future development so that it better reflects what residents need.
19. While this study is not able to advise on space standards or home configurations, it may reveal imbalances between the available stock and demographic trends.
20. Note, however, that the evidence gathered here takes the current population as its starting point and projects forward trends that exist today. It therefore risks embedding features of the housing stock and occupation patterns that the community may actually wish to change. In that sense, the findings in this report might be viewed as the baseline scenario on top of which the community's objectives and primary evidence should be layered to create a more complete picture and vision for the future.

RQ 2: What type (terrace, semi, bungalows, flats and detached) and size (number of bedrooms) of housing is appropriate for the Plan area over the Neighbourhood Plan period?

Specialist Housing for Older People

21. This chapter supplements the demographic evidence relating to Type and Size, including the potential demand for downsizing, to consider the quantity and characteristics of need for housing for older people with some form of additional care.

RQ 3: What provision should be made for specialist housing for older people over the Neighbourhood Plan period?

Relevant Data

22. This HNA assesses a range of evidence to ensure its findings are robust for the purposes of developing policy at the Neighbourhood Plan level and is locally specific. This includes data from the 2011 Census and a range of other data sources, including:
- Other Office of National Statistics (ONS) datasets providing more up-to-date demographic information;
 - ONS population and household projections for future years;
 - Valuation Office Agency (VOA) data on the current stock of housing;
 - Land Registry data on prices paid for housing within the local market;
 - Rental prices from Home.co.uk;
 - Local Authority housing waiting list data;
 - Cotswold SHMA, Further Update, Affordable Housing (2016);⁵
 - Gloucestershire Local Housing Needs Assessment (2020).⁶
23. More recent data sources for the population and existing housing stock will be used wherever possible in this report. However, Census datasets providing, for example, the breakdown of households (as opposed to individuals) by age and the tenure of dwellings, cannot accurately be brought up to date in this way. Such patterns are instead generally assumed to persist to the present day.

⁵ <https://www.cotswold.gov.uk/media/sevngyf5/3108-gloucestershire-shma-affordable-housing-update-april-2016.pdf>

⁶ <https://www.cotswold.gov.uk/media/b43lc01k/3110-gloucestershire-local-housing-needs-assessment-sept-2020.pdf>

4. RQ 1: Tenure, Affordability and the Need for Affordable Housing

RQ 1: What Affordable Housing (e.g. social housing, affordable rented, shared ownership, discounted market sale, intermediate rented) and other market tenures should be planned for in the housing mix over the Neighbourhood Plan period?

Introduction

24. This section approaches the question of affordability from two perspectives. First, it examines what tenure options are currently available in the parish and which of them might be most appropriate going forward, based on the relationship between how much they cost and local incomes. Second, it estimates the quantity of Affordable Housing that might be required during the Neighbourhood Plan period. The scale of need for these homes can justify planning policies to guide new development.
25. Tenure refers to the way a household occupies their home. Broadly speaking, there are two categories of tenure: market housing (such as homes available to purchase outright or rent from a private landlord) and Affordable Housing (including subsidised products like social rent and shared ownership). We refer to Affordable Housing, with capital letters, to denote the specific tenures that are classified as affordable in the current NPPF. A relatively less expensive home for market sale may be affordable but it is not a form of Affordable Housing.
26. The definition of Affordable Housing set out in the NPPF 2021 makes clear the Government's commitment to home ownership by broadening the definition to include a range of low-cost housing opportunities for those aspiring to own a home. As part of this effort, the Government has recently introduced a new product called First Homes.⁷
27. Because the First Homes product is new and expected to be an important part of the strategy for improving access to home ownership, it is worth summarising its key features and implications:
- First Homes should be available to buy with a minimum discount of 30% below their full market value (i.e. the value of an equivalent new home);
 - The discount level can be set higher than 30% – at 40% or 50% – where this can be suitably evidenced. The setting and justifying of discount levels can happen at neighbourhood as well as local authority scale;
 - After the discount is applied the initial sale price must not exceed £250,000 (or £420,000 in Greater London), and lower caps can be set locally;

⁷ The shape that the new First Homes product will take is set out in a Ministerial Statement issued in May 2021, available here: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>. The relevant update to PPG is available here: <https://www.gov.uk/guidance/first-homes#contents>.

- Purchasers must be first-time buyers with an income less than £80,000 (or £90,000 in Greater London), and First Homes can be prioritised for local people and/or key workers;
- They will be subject to legal restrictions ensuring the discount is retained for future occupants, and renting out or sub-letting will not normally be permitted;
- In addition to setting the discount level, local authorities and neighbourhood planning groups can apply additional criteria, such as a lower income cap, local connection test or prioritisation for key workers through adopted plans, emerging policy or Supplementary Planning Documents.
- 25% of all homes delivered through section 106 developer contributions on sites enabled through the planning process should be sold as First Homes. In simpler terms, 25% of all subsidised Affordable Housing on mainstream housing developments should be First Homes. This is likely to mean that First Homes will take the place of shared ownership housing in many circumstances, and in some cases may also displace social or affordable rented homes.

Current tenure profile

28. The current tenure profile is a key feature of the Neighbourhood Area (NA). Patterns of home ownership, private renting and affordable/social renting reflect demographic characteristics including age (with older households more likely to own their own homes), and patterns of income and wealth which influence whether households can afford to rent or buy and whether they need subsidy to access housing.
29. Table 4-1 presents data on tenure in Stow on the Wold and the Swells compared with Cotswold and England from the 2011 Census, which is the most recent available source of this information.
30. The NA has a higher proportion of social rented and lower proportion of private rented than both local or national averages. The proportion of owned households is very close to the local and national average. Overall, this is an interesting tenure mix for the NA's geography and particularly demonstrates a healthier supply of social housing than would be expected.
31. There is no current data on the proportion of housing that is rented because the choice to let out a property does not require planning permission or other changes that would be recorded centrally. The 2021 Census will provide the most robust and up-to-date picture of this when the results are released in the coming months. However, it is interesting to observe the change recorded between the 2001 and 2011 Census: in Stow on the Wold and the Swells the private rented sector expanded by 61.9% in that period, a rate of growth that was moderately above the district average of 56.2% and below the national average of 82.4%. In contrast to the national picture of near stasis, both the NA and Cotswold had around 9% growth in social rented housing stock between 2001 and 2011.

32. It is important to note that a rate of shared ownership likely to be above the 17% of dwellings not occupied at the time of the last Census, is not reflected in this data, not captured in the upcoming Census. The dwellings used as second homes and holiday lets are not associated with a permanent household, and only households report on tenure in the Census. These second homes and those added since are most likely to have formerly been in the owner-occupied tenure, although it is reasonable to assume that landlords renting their properties out to long term tenants may increasingly be turning to shorter-term holiday lets. These trends impact on the ability of local people to access tenures suitable to their needs, as well as creating upward pressure on housing costs generally.

Table 4-1: Tenure (households) in the NA, 2011

Tenure	NA	Cotswold	England
Owned; total	65.1%	65.7%	63.3%
Shared ownership	0.4%	1.2%	0.8%
Social rented; total	19.1%	14.9%	17.7%
Private rented; total	11.8%	15.2%	16.8%

Sources: Census 2011, AECOM Calculations

Affordability

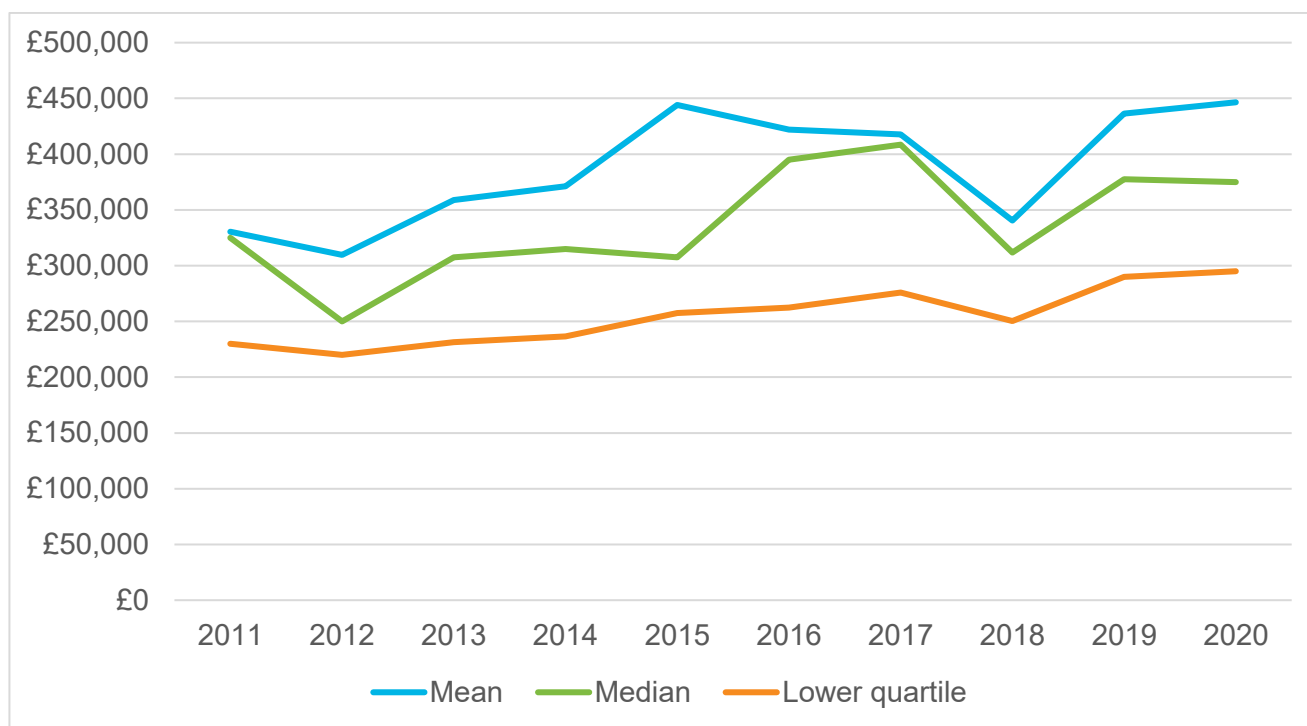
House prices

33. House prices provide an indication of the level of demand for homes within an area. The relationship between house prices and incomes determines whether housing is affordable to local households and, to a large extent, what tenure, type and size of home they occupy. Changes in affordability over time can indicate pressures in the housing market. As such, it is useful for the evidence base for plans to examine trends in prices and consider what this reveals about the local housing market.
34. Figure 4-1 looks at selected measures of house prices in Stow on the Wold and the Swells. It is worth quickly explaining the difference between mean and median. The mean captures the average of all the house prices, both highest and lowest, and the few outlying data points on the high end skew the mean higher, making it higher than the median. This can also be explained by the fact that lower house prices will tend to cluster around a lower price limit, whereas there are fewer economic constraints on the price of an exceptionally high house price for a particularly spacious or luxurious property. The median is more useful as a metric because it is the middle number when sorting the data from smallest to largest, therefore it is not skewed by exceptional data points and is a better representative average.
35. The data shows an overall trend of high price growth, with mean prices having increased 35% between 2011 and 2020 and the more useful metric of median prices having increased 15% between 2011 and 2020. As noted, the high divergence between mean and median growth can be explained by the increase of exceptionally expensive property sales over time which skews the mean above the median. There is also a large gap between the lower quartile and the median, demonstrating that a notable proportion of properties in the NA remain considerably cheaper than the overall average. In 2020, lower

quartile property prices were £295,000 in comparison with a median of £375,000, a difference of £80,000.

36. Home values have tended to follow a trend line except for a considerable drop in 2018 which was more than recovered in 2019. Upon inspecting the land registry entries for 2018, it appears that the sales of many homes in the Hawkesbury Place development had the effect of reducing average prices this year.

Figure 4-1: House prices by quartile in Stow on the Wold and the Swells, 2011-2020



Source: Land Registry PPD

37. Table 4-2 below breaks down house prices by type, presenting the median within each type. It shows that detached houses at an exceptional 58% had much more rapid price growth than other types, corroborating the possibility that the largest and most expensive properties are leading price growth. Semi-detached properties also had considerable growth at 31%. Terraced properties had the lowest price growth of just 5%. Flats were closer to the overall average at 12%. This data underlines that a process is occurring in the NA by which the larger and more desirable properties are leading price growth, with growing divergence between types such as terraced and detached over time. Detached properties were just £5,000 more expensive on average than terraced homes in 2011, but this difference increased to £203,000 by 2020.

Table 4-2: Median house prices by type in Stow on the Wold and the Swells, 2011-2020 (£,000)

Type	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Growth
Detached	£370	£335	£540	£400	£456	£588	£625	£445	£555	£585	58.1%
Semi-detached	£270	£249	£250	£265	£323	£302	£290	£342	£325	£353	30.6%
Terraced	£365	£306	£235	£283	£300	£412	£445	£345	£395	£382	4.7%
Flats	£283	£210	£310	£232	£195	£231	£275	£284	£296	£315	11.5%
All Types	£325	£250	£308	£315	£308	£395	£409	£312	£378	£375	15.4%

Source: Land Registry PPD

Income

38. Household incomes determine the ability of households to exercise choice in the housing market, and consequently the level of need for affordable housing products. Two sources of data are used to examine household incomes in the NA.
39. The first source is ONS's estimates of incomes in small areas. This is locally specific but limited to the overall average income (i.e. it does not provide the average income of lower earners). The average total household income before housing costs locally was £42,900 in 2018. A map of the area to which this data applies is provided in Appendix A.
40. The second source is ONS's annual estimates of UK employee earnings. This provides lower quartile average earnings (i.e. the income of the lowest 25% of earners). However, it is only available at the Local Authority level. It also relates to individual earnings. While this is an accurate representation of household incomes where there is only one earner, it does not represent household income where there are two or more people earning. Cotswold District's gross individual lower quartile annual earnings were £14,368 in 2019. To estimate the income of households with two lower quartile earners, this figure is doubled to £28,736.
41. It is immediately clear from this data that there is a large gap between the spending power of average earning households and those earning the lowest 25% of incomes, particularly where the household in question has one earner only.

Affordability Thresholds

42. To gain a clearer understanding of local affordability, it is useful to understand what levels of income are required to afford different tenures. This is done using 'affordability thresholds': the estimated amount of annual income required to cover the cost of rent or a mortgage given local housing prices.
43. AECOM has determined thresholds for the income required in Stow on the Wold and the Swells to buy a home in the open market (average and entry-level prices), and the income required to afford private rent and the range of Affordable Housing tenures as set out in the NPPF. These calculations are detailed and discussed in more detail in Appendix A.
44. The key assumptions made in assessing the affordability of different tenures are explained alongside the calculations, but it is worth noting here that we have assumed that the maximum percentage of household income that should be spent on rent is 30% and that mortgage financing will be offered at a maximum of 3.5 times household income.
45. Table 4-3 summarises the estimated cost of each tenure, the annual income required to support these costs within the NA, and whether local incomes are sufficient. The income required column assumes the household already has access to a deposit (which we have assumed to be 10% of the value to be purchased) but does not reflect the possibility that households may already hold equity from an existing property. Although these factors may

be crucial to whether housing will be affordable, they are highly dependent on individual circumstances that cannot be anticipated here.

46. The same information is presented as a graph in Figure 4-2 on a subsequent page, with selected measures from the table presented for clarity.

Table 4-3: Affordability thresholds in Stow on the Wold and the Swells (income required, £)

Tenure	Mortgage value (90% of price)	Annual rent	Income required	Affordable on average incomes? £42,900	Affordable on LQ earnings (single earner)? £14,368	Affordable on LQ earnings (2 earners)? £28,736
Market Housing						
Median House Price	£337,500	-	£96,429	No	No	No
LA New Build Mean House Price	£369,000	-	£105,429	No	No	No
LQ/Entry-level House Price	£265,500	-	£75,857	No	No	No
Average Market Rent	-	£17,508	£58,361	No	No	No
Entry-level Market Rent	-	£15,285	£50,949	No	No	No
Affordable Home Ownership						
First Homes (-30%)	£212,625	-	£60,750	No	No	No
First Homes (-40%)	£182,250	-	£52,071	No	No	No
First Homes (-50%)	£151,875	-	£43,393	Marginal	No	No
Shared Ownership (50%)	£168,750	£4,688	£63,839	No	No	No
Shared Ownership (25%)	£84,375	£7,031	£47,545	Marginal	No	No
Shared Ownership (10%)	£33,750	£8,438	£37,768	Yes	No	No
Affordable Rented Housing						
Affordable Rent	-	£7,025	£23,329	Yes	No	Yes
Social Rent	-	£5,445	£18,132	Yes	No	Yes

Source: AECOM Calculations

47. Before considering each tenure category in turn, it is important to stress that these affordability thresholds have been calculated to give a sufficiently robust indication of the costs of various tenures to inform Neighbourhood Plan policy choices. These figures rely on existing data and assumptions, and it is not possible to estimate every possible permutation. The income figures also disguise a large degree of variation. For simplicity the analysis below speaks in terms of tenure products being 'affordable' or 'not affordable' for different groups, but individual circumstances and the location, condition and other factors of specific properties in each category have a large impact. These conclusions should therefore be interpreted flexibly.

Market housing for purchase and rent

48. Thinking about housing for purchase on the open market, it appears that local households on average incomes are unable to access even entry-level homes unless they have the advantage of a very large deposit. Market housing, even with the benefit of a higher than average income, is likely to remain out of reach to most. The median

house price would require an annual income 56% higher than the current average, and an entry-level house price would require an annual income 43% higher. This demonstrates that the NA has severe issues with housing affordability.

49. Private renting is generally only affordable to higher than average earners. Households made up of two lower quartile earners cannot afford the given rental thresholds. Affordability is improved if households are able or willing to dedicate a larger proportion of their incomes to rental costs, although this has repercussions for other quality of life aspects and cannot be assumed to suit all individuals' circumstances.

Affordable home ownership

50. There is a relatively large group of households in Stow on the Wold and the Swells who may be able to afford to rent privately but cannot afford home ownership. They are typically earning between around £50,949 per year (at which point entry-level rents become affordable) and £75,857 (at which point entry-level market sale homes become affordable). This 'can rent, can't buy' cohort may benefit from the range of affordable home ownership products such as First Homes and shared ownership.
51. First Homes are to be offered at a discount of at least 30% on equivalent market prices (i.e. new build, entry-level properties). Local authorities and neighbourhood plan qualifying bodies will have discretion to increase the discount on First Homes to 40% or 50% where there is evidence to suggest this is appropriate.
52. This report has estimated the income required to afford First Homes and tested the implications of 30%, 40% and 50% discount levels. Even the 50% discount level would only marginally bring average earner households within reach of being able to afford a home, and is unfortunately not in reach of dual lower quartile earner households. There is certainly evidence to require the maximum 50% discount level in the case of the NA, but owing to the extent of affordability issues, this will only just bring average earners within reach of home ownership.
53. Table 4-4 on the following page shows the discount required for First Homes to be affordable to the three income groups. Because it is not possible to estimate the cost of a typical First Home due to the small sample of new build entry-level house prices in the NA, it is worth considering the discounts required for some additional price benchmarks. The table above uses median house prices in the NA as the best proxy for the cost of a newly built entry-level home in the area, because this reflects the local market and accounts for the price premium usually associated with newly built housing (which would bring the price closer to the price of median existing homes than existing entry-level homes). However, it is worth thinking about First Homes in relation to the cost of new build prices in the wider area, and of entry-level existing prices locally to get a more complete picture. The discount levels required for these alternative benchmarks are given on the following page, but do not change the main conclusion that 50% discounts appear necessary.

Table 4-4: Discount on sale price required for households to afford First Homes

Tenure/product	Mean Income	LQ Income x1	LQ Income x2
NA Median house price	56%	85%	70%
LA New build mean house price	59%	86%	73%
NA Entry-level house price	43%	81%	62%

Source: Land Registry PPD; ONS MSOA total household income

54. Shared ownership appears to be slightly more affordable than First Homes, but is broadly accessible to the same groups. The Government has recently announced that the minimum equity share for shared ownership will fall to 10% of the property value.⁸ If this is delivered in the NA, it will make shared ownership easier to access for more people. However, while the income threshold for a 10% equity shared ownership home is lower, this product may not necessarily be more attractive than the alternatives (such as shared ownership at higher equity shares and First Homes) for those who can afford them.
55. The transition from 10% to 100% ownership would be long, and during this period the rent on the 90% unsold value would not be subsidised, meaning that monthly costs for occupants will remain relatively high and the build-up of equity will be relatively slow. This product would therefore only be a realistic route to full ownership for households prepared to take a long-term view.
56. The income required to access rent to buy is assumed to be the same as that required to afford market rents. On that basis, First Homes and shared ownership are more affordable options.
57. These three products need to be considered in relation to what they offer occupants in the long term beyond simply being affordable to access or not.
- First Homes allow for a greater ownership stake in the property, enabling occupiers to benefit from price appreciation over time. Monthly outgoings are also limited to mortgage costs alone, which tend to be cheaper than renting.
 - Shared ownership at high equity shares performs a similar function to First Homes, but there are additional costs associated with the rented portion.
 - Shared ownership at low equity shares can usually be accessed by lower earning households (than First Homes) and requires a smaller deposit. However, this is a potentially less attractive route to eventual ownership because monthly outgoings remain high. The occupant has to pay a significant monthly rent as well as service charges and other costs, so it can be harder for them to save funds to buy out a greater share in the property over time.

⁸ The previous minimum equity share was 25%. This change took effect from 28 June 2021 and transitional arrangements are in place for planning policy documents that are prepared during the implementation timeframe. Changes are also introduced to make the process of staircasing to full ownership more gradual with lower minimum increments of 1%. The ministerial statement confirming and detailing the changes is available here: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>.

- Rent to buy requires no deposit, thereby benefitting those with sufficient incomes but low savings. It is more attractive than renting but results in a much slower accumulation of the funds that can provide an eventual route to ownership than the other tenures discussed above.

58. In conclusion, First Homes and shared ownership products would provide valuable to different segments of the local population, with shared ownership at a lower than 25% equity share potentially allowing more average earning households to get a foot on the housing ladder and First Homes (at 50% discount) may provide a better long-term investment to those who can afford to access it. Rent to buy is not recommended because market rents are unaffordable even to average earners in the NA.

Affordable rented housing

59. Affordable rented housing is generally affordable to households with two lower earners depending on their household size (average earning households are unlikely to be eligible). However, households with a single lower earner appear unable to afford any of the tenures considered including the smallest socially rented units. Many such individuals will, if unable to secure a social rented dwelling require additional subsidy through Housing Benefit to access housing.
60. The evidence in this chapter suggests that the affordable rented sector performs a vital function in Stow on the Wold and the Swells as the only option for a large segment of those in the greatest need. Social rents are cheaper and would therefore leave households on lower earnings better off and better able to afford their other living costs, such as food and fuel etc. Where households are supported by housing benefit the difference in the cost of affordable and social rents may be irrelevant as the level of housing benefit flexes according to the rent. This mean that households supported by housing benefit may be no better off in social rented accommodation because they receive a lower rate of housing benefit to cover their rent.

Figure 4-2: Affordability thresholds in Stow on the Wold and the Swells, income required (additional cost of deposit in black)



Source: AECOM Calculations

Affordable housing- quantity needed

61. The starting point for understanding the need for affordable housing in Stow on the Wold and the Swells is the relevant Local Housing Need Assessment (LHNA). An LHNA was undertaken for six local authorities in Gloucestershire in 2020.⁹ This study estimates the need for affordable housing in the respective authorities based on analysis of the Councils' waiting lists and analysis of other data sets in line with Planning Practice Guidance at the time. The LHNA identifies the need for 125 additional affordable homes each year in Cotswold District as a whole, for the period 2021 - 2041. Broken down by social rent, affordable rent and affordable home ownership products, the report sets out a need for 56 social rent homes a year, 18 affordable rent homes a year and 51 affordable home ownership product homes a year.
62. When the LHNA figures are pro-rated to Stow on the Wold and the Swells based on its fair share of the population (2.93% of the LPA's population), this equates to 4 homes per annum (rounded) or 37 homes over the Neighbourhood Plan period (2021-2031). Following the LHNA distribution of need by affordable housing type, this would indicate 17 homes for social rent, 5 homes for affordable rent, therefore 22 rented homes in total, and 15 affordable owned homes over the plan period. This can be summarised as a tenure split of 59% affordable rent (of which 45% social and 14% other affordable rent) and 41% affordable home ownership.
63. In Table 4-5 on the following page we have also calculated, using PPG as a starting point,¹⁰ our own estimate of the total need for affordable rented housing in Stow on the Wold and the Swells over the Plan period. It should, however, be noted that the accuracy of the findings generated by the model is only as strong as the evidence we have available to us. For example, Census 2011 data is increasingly out-of-date. However, given the test of proportionality for evidence supporting neighbourhood plans, and the need to be in conformity with Local Authority strategic policies, the calculations set out here are considered a reasonable basis for understanding and planning for neighbourhood-level affordable housing need.
64. It should also be noted that figures in Table 4-6: Estimate of the potential demand for affordable housing for sale in Stow on the Wold and the Swells

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Current number of renters in parish	165.8	Census 2011 number of renters x national % increase to 2018.
1.2 Percentage renters on housing benefit in LA	11%	% of renters in 2018 on housing benefit.
1.3 Number of renters on housing benefits in parish	18.2	Step 1.1 x Step 1.2.

⁹ Available at [Evidence base and monitoring - Cotswold District Council](#)

¹⁰ Paragraphs 024-026 Reference ID: 2a-026-20140306, at <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

1.4 Current need (households)	110.7	Current renters minus those on housing benefit and minus 25% assumed to rent by choice.
1.5 Per annum	11.1	Step 1.4 divided by plan period.
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	186.1	LA household projections for plan period (2018 based) pro-rated to NA.
2.2 % of households unable to buy but able to rent	8.7%	(Step 1.4 + Step 3.1) divided by number of households in NA.
2.3 Total newly arising need	17.5	Step 2.1 x Step 2.2.
2.4 Total newly arising need per annum	1.3	Step 2.3 divided by plan period.
STAGE 3: SUPPLY OF AFFORDABLE HOUSING		
3.1 Supply of affordable housing	3	Cotswold District Council data (2021)
3.2 Supply - intermediate resales	0.1	Step 3.1 x 3% (assumed rate of re-sale).
NET SHORTFALL PER ANNUM		
Overall shortfall per annum	12.2	(Step 1.5 + Step 2.4) - Step 3.2.
Overall shortfall over the plan period	126.1	((Step 1.5 + Step 2.4)) – Step 3.2) * plan period

Source: AECOM model, using Cotswold District Council data (2021) Census 2011, English Housing Survey 2018, DLUHC 2018 based household projections and net additions to affordable housing stock. 2018 is the latest reliable data for some datasets so is used throughout for consistency.

65. Reviewing the two models together, it appears that the models may be overstating the extent to which affordable home ownership products are required in comparison with affordable rented homes. This is largely down to the divergent amounts of existing stock and consequently greatly differing level of re-lets. There are also other considerations that suggest that the LHNA tenure mix may be more proportionate.
66. Firstly, affordable rented homes require much lower income thresholds and reach those on dual lower quartile incomes. As discussed, even First Homes at 50% discount level only just reach average earner households. In cases such as these, it is generally best practice to prioritise reaching the most households, and affordable rented homes extend affordability to many lower income households.
67. Secondly, there is an extent to which the existing social housing stock, whilst a positive, is acting to conceal the level of affordable rented need in the models. It would present a risk to assume that current levels of turnover will persist in future. On a related point, the current deficit of affordable home ownership homes is leading to a very high need for this tenure. This imbalance should be redressed, but not by overly restricting the supply of affordable rented homes.
68. Therefore, having run independent models of affordable housing need, it is concluded that reverting to the LHNA mix is the best solution for the Neighbourhood Plan. This relatively balanced approach of 59% affordable rent and 41% affordable home ownership will help foster a more balanced tenure mix whilst also ensuring that the needs of those households in greatest need are prioritised.

69. There is no policy or legal obligation on the part either of the Local Authority or Neighbourhood Plan to meet affordable housing needs in full, though there are tools available to the Steering Group that can help ensure that it is met to a greater extent if resources permit (e.g. the ability to allocate sites for affordable housing).
70. It is also important to remember that even after the Neighbourhood Plan is made the assessment of need for Affordable Housing, the allocation of affordable rented housing to those in need, and the management of the housing waiting list all remain the responsibility of the Local Authority rather than the neighbourhood planning group.
71. are largely dependent on information provided by the Cotswold District in its capacity as manager of the local housing waiting list. The latest data shows that there are 48 households with a local connection to Stow on the Wold and the Swells parishes on the housing register.
72. In line with the data supplied by Cotswold District Council, the table shows that there are currently about 48 households in Stow on the Wold and the Swells unable to access affordable rented homes suitable to their needs. The table also suggests that, over the Plan period, 47 additional households in the Neighbourhood Area will fall into need, producing total need for affordable rented homes of 5 after turnover in the existing stock (which can accommodate arising need) is accounted for.
73. This result may initially be surprising since there is understood to be a high current backlog of need (in the region of 48 households). The reason for the apparently small need over the long-term is that model includes the rate of turnover in the relatively high existing affordable housing stock of 9 homes per annum, based on the latest data. So, it can be expected that around 9 homes will come vacant in any given year as their current occupants move to a new location, pass away or cease to be eligible as their circumstances change. This helps to satisfy the projected newly arising need as well as some of the backlog, which is effectively spread out over the 10-year period to produce an annualized figure. This figure of 9 homes is also backed up by an alternative calculation, assuming a stock re-let rate of 3% which is considered standard in rural areas, which arrives at a figure of 8 homes per year based on the estimated existing affordable housing stock in the NA of 261 homes.
74. An important caveat to this finding is that there are at least 48 households currently in need in the NA, and to 'spread them out' over the Plan period suggests that some of them can be accommodated in ten years' time once a sufficient surplus has been built up through new supply and turnover of the existing stock. While possible, this is not favourable to the individuals involved. In practice, it would be better to frontload any future affordable rented provision to meet those needs as soon as possible, leaving newly arising need in future to be met by turnover in the existing stock.
75. A further caveat worth emphasizing is that one unit of Affordable Housing does not necessarily service one household worth of need, since the unit might have 2

bedrooms while the applicant household might require 4 bedrooms, may be located in an inappropriate location, or be otherwise unsuitable.

76. As such, it is recommended that Stow on the Wold and the Swells considers encouraging the delivery of more affordable rented housing, particularly early in the Plan period, with the understanding that if this results in oversupply in future years, the vacancies created when existing occupants leave their properties may need to satisfy new need from elsewhere in the district.
77. The NA differs substantially from the wider District in that it has a significantly higher social housing stock than would typically be expected. The high amount of re-lets may therefore be concealing the level of affordable housing need in Table 4-5.

Table 4-5: Estimate of need for Affordable Housing for rent in Stow on the Wold and the Swells

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Current households in need	48	Cotswold District Council data (2021)
1.2 Per annum	4.8	Step 1.1 divided by the plan period to produce an annualised figure.
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	186.1	DLUHC 2018-based household projections for the LA between start and end of plan period. % increase applied to NA.
2.2 Proportion of new households unable to rent in the market	25.2%	(Steps 1.1 + 2.2.1 + 2.2.2) divided by number of households in NA.
2.2.1 Current number of social renters in parish	261.3	2011 Census social rented occupancy + LA % increase.
2.2.2 Number of private renters on housing benefits	18.2	Housing benefit caseload May 2018. Pro rata for NA.
2.3 New households unable to rent	46.9	Step 2.1 x Step 2.2.
2.4 Per annum	4.7	Step 2.3 divided by plan period.
STAGE 3: TURNOVER OF AFFORDABLE HOUSING		
3.1 Supply of social/affordable re-lets (including transfers)	9	Cotswold District Council data (2021)
NET SHORTFALL OF RENTED UNITS PER ANNUM		
Overall shortfall per annum	0.5	(Step 1.2 + Step 2.4) - Step 3.1
Overall shortfall over the plan period	4.9	((Step 1.2 + Step 2.4) – Step 3.1) * plan period

Source: AECOM model, using Cotswold District Council data 2021, Census 2011, English Housing Survey 2018, DLUHC 2018 based household projections and net

additions to affordable housing stock. 2018 is the latest reliable data for some datasets so is used throughout for consistency. Figures may not sum due to rounding.

78. Turning now to Affordable Housing providing a route to home ownership, Table 4-6 on the next page estimates the potential demand in Stow on the Wold and the Swells. This model aims to estimate the number of households might wish to own their own home but cannot afford to – the ‘can rent, can’t buy’ group described in the previous section. The model is consistent with methods used at Local Authority scale in taking as its starting point households currently living in or expected to enter the private rented sector who are not on housing benefit.
79. There may be other barriers to these households accessing home ownership on the open market, including being unable to save for a deposit, or being unable to afford a home of the right type/size or in the right location. The model also discounts 25% of households potentially in need, assuming a proportion will be renting out of choice. This is assumption is based on consistent results for surveys and polls at the national level which demonstrate that most households (typically 80% or more) aspire to home ownership.¹¹ No robust indicator exists for this area or a wider scale to suggest aspirations may be higher or lower in the NA.
80. The result of the calculation is 12 households per annum who may be interested in affordable home ownership (or 126 for the entirety of the Plan period).
81. Again this assumes a rate of turnover in the existing stock will satisfy some need, though this is extremely minimal because of the lack of shared ownership properties in the NA currently, at only 3 homes.
82. It is important to keep in mind that the households identified in this estimate are, by and large, adequately housed in the private rented sector, Affordable Housing, or living in other circumstances. They do not necessarily lack their own housing but would prefer to buy rather than rent. They have been included in the national planning definition of those in need of Affordable Housing, but their needs are less acute than those on the waiting list for affordable rented housing.

¹¹ <http://www.ipsos-mori-generations.com/housing.html>

Table 4-6: Estimate of the potential demand for affordable housing for sale in Stow on the Wold and the Swells

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Current number of renters in parish	165.8	Census 2011 number of renters x national % increase to 2018.
1.2 Percentage renters on housing benefit in LA	11%	% of renters in 2018 on housing benefit.
1.3 Number of renters on housing benefits in parish	18.2	Step 1.1 x Step 1.2.
1.4 Current need (households)	110.7	Current renters minus those on housing benefit and minus 25% assumed to rent by choice. ¹²
1.5 Per annum	11.1	Step 1.4 divided by plan period.
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	186.1	LA household projections for plan period (2018 based) pro-rated to NA.

¹² The assumption of approximately 25% preferring to rent and 75% preferring to buy is AECOM's judgement, based on national level polls which consistently reveal that most households who prefer home ownership e.g. <http://www.ipsos-mori-generations.com/housing.html> and informed by our experience across numerous neighbourhood level HNAs. The assumption is based on the fact that some households choose to rent at certain stages in their life (e.g. when young, when needing flexibility in employment market, or when new migrants move into an area). While most households prefer the added security and independence of owning their own home, private renting is nevertheless a tenure of choice at a certain points in many households' journey through the housing market. The actual percentage of preference will differ between areas, being higher in large metropolitan areas with younger households and more new migrants, but lower in other areas. 25% is used as a reasonable proxy and for consistency across HNAs and similar assumptions are used in some larger scale assessments such as LHNAs and SHMAs. If the neighbourhood planning group feel this is not an appropriate assumption in their particular locality they could use the results of a local residents survey to refine or confirm this calculation.

2.2 % of households unable to buy but able to rent	8.7%	(Step 1.4 + Step 3.1) divided by number of households in NA.
2.3 Total newly arising need	17.5	Step 2.1 x Step 2.2.
2.4 Total newly arising need per annum	1.3	Step 2.3 divided by plan period.
STAGE 3: SUPPLY OF AFFORDABLE HOUSING		
3.1 Supply of affordable housing	3	Cotswold District Council data (2021)
3.2 Supply - intermediate resales	0.1	Step 3.1 x 3% (assumed rate of re-sale).
NET SHORTFALL PER ANNUM		
Overall shortfall per annum	12.2	(Step 1.5 + Step 2.4) - Step 3.2.
Overall shortfall over the plan period	126.1	((Step 1.5 + Step 2.4)) – Step 3.2) * plan period

Source: AECOM model, using Cotswold District Council data (2021) Census 2011, English Housing Survey 2018, DLUHC 2018 based household projections and net additions to affordable housing stock. 2018 is the latest reliable data for some datasets so is used throughout for consistency.

83. Reviewing the two models together, it appears that the models may be overstating the extent to which affordable home ownership products are required in comparison with affordable rented homes. This is largely down to the divergent amounts of existing stock and consequently greatly differing level of re-lets. There are also other considerations that suggest that the LHNA tenure mix may be more proportionate.
84. Firstly, affordable rented homes require much lower income thresholds and reach those on dual lower quartile incomes. As discussed, even First Homes at 50% discount level only just reach average earner households. In cases such as these, it is generally best practice to prioritise reaching the most households, and affordable rented homes extend affordability to many lower income households.
85. Secondly, there is an extent to which the existing social housing stock, whilst a positive, is acting to conceal the level of affordable rented need in the models. It would present a risk to assume that current levels of turnover will persist in future. On a related point, the current deficit of affordable home ownership homes is leading to a very high need for this tenure. This imbalance should be redressed, but not by overly restricting the supply of affordable rented homes.
86. Therefore, having run independent models of affordable housing need, it is concluded that reverting to the LHNA mix is the best solution for the Neighbourhood Plan. This relatively balanced approach of 59% affordable rent and 41% affordable home ownership will help foster a more balanced tenure mix whilst also ensuring that the needs of those households in greatest need are prioritised.
87. There is no policy or legal obligation on the part either of the Local Authority or Neighbourhood Plan to meet affordable housing needs in full, though there are tools available to the Steering Group that can help ensure that it is met to a greater extent if resources permit (e.g. the ability to allocate sites for affordable housing).

88. It is also important to remember that even after the Neighbourhood Plan is made the assessment of need for Affordable Housing, the allocation of affordable rented housing to those in need, and the management of the housing waiting list all remain the responsibility of the Local Authority rather than the neighbourhood planning group.

Affordable Housing policy guidance

89. Cotswold District's adopted policy on this subject Policy H2 requires 30 to 40% of developments of 11 or more dwellings or over 1,000sqm to be affordable. Specifically, the affordable housing requirement on all sites requiring a contribution, subject to viability is: up to 30% of new dwellings gross on brownfield sites; and up to 40% of new dwellings gross on all other sites.
90. The overall proportion of housing that must be affordable is not an area of policy that a Neighbourhood Plan can usually influence, but it is worth emphasizing that the HNA finds there to be robust evidence of need for Affordable Housing in the NA, and every effort should be made to maximise delivery where viable.
91. The HNA can supply more localized evidence, and this section summarises the factors that might be taken into account before proposing a suggested Affordable Housing tenure mix that might be suitable for Stow on the Wold and the Swells specifically.
92. The following evidence and considerations may be used as a starting point in the development of policy concerning the Affordable Housing mix:
- A. **Evidence of need for Affordable Housing:** Applying conclusions from the LHNA, this study estimates that Stow on the Wold and the Swells requires roughly 22 units of affordable rented housing and 15 units of affordable home ownership over the Plan period. Both forms of Affordable Housing appear to be valuable in meeting the needs of people on various incomes.
- The relationship between these figures suggests that 59% of Affordable Housing should be rented and 41% should offer a route to ownership. However, as noted above, these figures are not directly equivalent: the former expresses the identified need of a group with acute needs and no alternative options; the latter expresses potential demand from a group who are generally adequately housed in rented accommodation and may not be able to afford the deposit to transition to ownership.
- B. **Can Affordable Housing needs be met in full?** How far the more urgently needed affordable rented housing should be prioritised in the tenure mix depends on the quantity of overall housing delivery expected.
- It is not currently known how many affordable homes might be expected in the NA. If the majority of Stow on the Wold and the Swells' development is expected to come forward in the form of small infill developments, those schemes are unlikely to be large enough to meet the threshold of 11 dwellings, above which the Affordable Housing policy

applies. If that is the case, the potential delivery of Affordable Housing is likely to be lower still. This would not be sufficient to satisfy the total potential demand for Affordable Housing identified here.

As a result, affordable rented housing should have a higher weighting in the tenure mix to ensure that the most acute needs are met as a priority. But given the expected volume of future delivery it is reasonable to assume that supply will be limited, and affordable rented accommodation should be prioritised. The 59% rented 41% ownership guideline mix in the LHNA offers an appropriate benchmark.

- C. **Government policy (e.g. NPPF) requirements:** current NPPF policy requires 10% of all homes to be delivered for affordable home ownership. For 10% of all housing to be affordable ownership in Cotswold District, where 30 to 40% of all housing should be affordable, 33% of Affordable Housing should be for affordable ownership.

There can be exceptions to this requirement if it would prevent the delivery of other forms of Affordable Housing. Based on the findings of this HNA there is no evidence that meeting the 10% threshold in Stow on the Wold and the Swells would prejudice the provision of much needed affordable rented homes. There is substantial evidence of affordable home ownership need in the NA and the District.

- D. **First Homes policy:** the Government recently concluded a consultation on the introduction of First Homes (to provide at least 30% discount on new build home prices). The proposals have now been enacted through a ministerial statement. A minimum of 25% of all Affordable Housing secured through developer contributions are now required to be First Homes.

This new minimum requirement may have the effect of displacing other products in any established tenure mix, and will reduce the amount of social or affordable rent if this was proposed to be more than 75% of Affordable Housing. However, this is not the case as the LHNA recommends 41% delivery as affordable home ownership products.

After the 25% First Homes requirement has been met, the remaining 75% of Affordable Housing units should as a first priority protect the provision for social rent set out in the Local Plan. The remaining units should then be allocated to other tenure products in the relative proportions set out in the Local Plan.

This guidance generally applies to district-level policy, and there may still be potential for a neighbourhood plan tenure mix to deviate from how the other tenures are rebalanced if appropriate.

- E. **Viability:** HNAs cannot take into consideration the factors which affect viability in the neighbourhood area or at the site-specific level. Viability issues are recognised in the Local Plan, and it is acknowledged that this

may affect the provision of affordable housing, the mix of tenures provided and the discounts that can be sought on First Homes properties.

- F. **Funding:** the availability of funding to support the delivery of different forms of Affordable Housing may also influence what it is appropriate to provide at a particular point in time or on any one site. The neighbourhood planning group may wish to keep this in mind so that it can take up any opportunities to secure funding if they become available.
 - G. **Existing tenure mix in Stow on the Wold and the Swells:** There is a considerable amount of social rented housing in the NA at 19.1% of households. This suggests that some provision of Affordable Housing would offer a wider choice of homes for local residents and, importantly, may allow those on lower incomes including newly forming households and younger families to remain in or move to the area.
 - H. **Views of registered providers:** it is not within the scope of this HNA to investigate whether it would be viable for housing associations (registered providers) to deliver and manage affordable rented homes in the parish. The funding arrangements available to housing associations will determine rent levels.
 - I. **Wider policy objectives:** the neighbourhood planning group may wish to take account of broader policy objectives for Stow on the Wold and the Swells and/or the wider district. These could include, but are not restricted to, policies to attract younger households, families or working age people to the NA. These wider considerations may influence the mix of Affordable Housing provided.
- 93. On the basis of the considerations above, Table 4-7 proposes an indicative Affordable Housing tenure mix that might be sought through Neighbourhood Plan policy.
 - 94. This indicative mix reflects the affordable housing need mix in the LHNA. This balanced mix prioritises affordable housing for rent whilst also accounting for the substantial need for affordable home ownership products. Our calculations estimated a much greater level of affordable home ownership need, however, this has been reflected upon earlier. We have considered the priority of reaching those on the lowest incomes and the extent to which a high level of stock re-lets results in an optimistic view of net need.
 - 95. Since First Homes appears the most affordable and helpful affordable home ownership option locally, assuming it can be offered at the appropriate discount level of 50%, national policy that First Homes should represent 25% of the affordable mix should be exceeded here. We recommend a slightly higher 30% share. In the interests of diversity and maximizing choice, a further 11% is then allocated to shared ownership rather than more First Homes. Shared ownership has the advantage of requiring a smaller deposit and may therefore be useful to some households. Rent to buy does not feature in the recommended mix as market rents are not affordable to average income households locally. The

breakdown of affordable housing for rent follows the LHNA recommended split, with 45% as social rent and 14% affordable rent.

96. This mix should be viewed as a starting point, based primarily on secondary evidence, which should be reconsidered in light of considerations F to J on the previous page, and in particular the views and objectives of the community.
97. Where the neighbourhood planning group wish to develop policy that deviates from that outlined in the Local Plan – either by differing from the headline split between renting and ownership or by specifying a greater level of detail around sub-tenures, it is important that they liaise with Cotswold District to gather more detailed income and viability information, and to ensure that departures from the local policy context have their support.
98. Another option when developing Neighbourhood Plan policies on tenure splits is to add caveats to the policy in question, to the effect that the precise mix of affordable housing will be considered on the basis of site-by-site circumstances in addition to this evidence.

Table 4-7: Indicative tenure split (Affordable Housing)

Tenure	Indicative mix	Considerations and uncertainties
Routes to home ownership, of which	41%	
First Homes (50% discount)	30%	Product untested so uncertainties around viability, developer, lenders and buyer appetite etc.
Shared ownership	11%	Recently confirmed changes to the model to allow purchases of 10% share - impact on viability unknown. RPs business plans currently reliant on shared ownership model. Impact of displacement by First Homes unknown.
Rent to buy	0%	Emerging product with popularity and effectiveness as yet unknown. Impact of displacement by First Homes unknown. Not recommended on the basis that the income required to afford average market rents is well above the average household income.
Affordable Housing for rent, of which	59%	
Social rent	45%	Uncertain how much funding available to support this tenure in local area. Uncertain whether RPs willing to own/manage stock in this area.
Affordable rent	14%	Uncertain whether RPs willing to own/manage stock in this area.

Source: AECOM calculations

Conclusions- Tenure and Affordability

99. The NA has a higher proportion of social rented and lower proportion of private rented occupancy than both local and national averages. The proportion of owned households is very close to the local and national average. Overall, this is an interesting tenure mix for the NA's geography and particularly demonstrates a healthier supply of social housing than would be expected, albeit a supply of social housing that needs to be substantially increased to meet local housing needs. An additional key factor to consider in the NA is the proportion of second homes, which accounts for a substantial 17% of housing stock. This is having a significant impact on the availability of tenures in the area and consequently housing affordability.
100. The data on house prices shows an overall trend of high price growth, with mean prices having increased 35% between 2011 and 2020 and the more useful metric of median prices having increased 15% between 2011 and 2020. The high divergence between mean and median growth can be explained by the increase of exceptionally expensive property sales over time which skews the mean above the median. There is also a large gap between the lower quartile and the median, demonstrating that a notable proportion of properties in the NA remain considerably cheaper than average. In 2020, lower quartile property prices were £295,000 in comparison with a median of £375,000, a difference of £80,000.
101. Prices have tended to follow a trend line except for a considerable drop in 2018 which was more than recovered in 2019. Upon inspecting the land registry entries for 2018, it appears that the sales of many homes in the Hawkesbury Place development had the effect of reducing average prices in that year.
102. Detached houses had much more rapid price growth than other types at 58%, adding to the data signal that the largest and most expensive properties are leading price growth. Semi-detached properties also had considerable growth at 31%. Terraced properties had the lowest price growth of just 5%. Flats were closer to the overall average at 12%.
103. Thinking about housing for purchase on the open market, it appears that local households on average incomes are unable to access even entry-level homes unless they have the advantage of a very large deposit. Market housing, even with the benefit of a higher than average income, is likely to remain out of reach to most. The median house price would require an annual income 56% higher than the current average, and an entry-level house price would require an annual income 43% higher. This demonstrates that the NA has severe issues with housing affordability.
104. Private renting is generally only affordable to higher than average earners. Households made up of two lower quartile earners cannot afford the given rental thresholds. Affordability is improved if households are able or willing to dedicate a larger proportion of their incomes to rental costs, although this has repercussions for other quality of life aspects and cannot be assumed to suit all individuals' circumstances.

105. There is a relatively large group of households in Stow on the Wold and the Swells who may be able to afford to rent privately but cannot afford home ownership. They are typically earning between around £50,949 per year (at which point entry-level rents become affordable) and £75,857 (at which point entry-level market sale homes become affordable). This 'can rent, can't buy' cohort may benefit from the range of affordable home ownership products such as First Homes and shared ownership.
106. This report has estimated the income required to afford First Homes and tested the implications of 30%, 40% and 50% discount levels. Even the 50% discount level would only marginally bring average earner households within reach of being able to afford a home, and is unfortunately not in reach of dual lower quartile earner households. There is certainly evidence to require the maximum 50% discount level in the case of the NA, but owing to the extent of affordability issues, this will only just bring average earners within reach of home ownership.
107. Affordable rented housing is generally affordable to households with two lower earners depending on their household size (average earning households are unlikely to be eligible). However, households with a single lower earner appear unable to afford any of the tenures considered including the smallest socially rented units. Many such individuals will, if unable to secure a social rented dwelling require additional subsidy through Housing Benefit to access housing.
108. The evidence in this chapter suggests that the affordable rented sector, and especially social rent, performs a vital function in Stow on the Wold and the Swells as the only option for a large segment of those in the greatest need.
109. A key issue the Neighbourhood Plan group feel needs addressing, which is supported by CDC, is the need to ensure there is a mixed demographic to maintain the sustainability of the community. Given recent trends show an increase in older people, it will be essential for social rented dwellings to be delivered in the Parish to allow younger people and families to move to or stay in the Parish.
110. Turning to the quantity of affordable homes needed, the first source of analysis is the most recent LHNA, produced for the six Gloucestershire local authorities in 2020. The LHNA identifies the need for 125 additional affordable homes each year in Cotswold District as a whole, for the period 2021 - 2041. The report breaks this down to a need for 56 social rent homes a year, 18 affordable rent homes a year and 51 affordable home ownership product homes a year.
111. When the LHNA figures are pro-rated to Stow on the Wold and the Swells based on its fair share of the population (2.93% of the LPA's population), this equates to 4 homes per annum (rounded) or 37 homes over the Neighbourhood Plan period (2021-2031). Following the LHNA distribution of need by affordable sub-tenure, this would indicate 17 homes for social rent, 5 homes for affordable rent, therefore 22 rented homes in total, and 15 affordable owned homes over the plan period. This can be summarised as a tenure split of 59% affordable rent (of which 45% social and 14% other affordable rent) and 41% affordable home ownership.

112. When testing our own models of the need for affordable homes by rent and as home ownership products, it appeared that the need was skewed towards home ownership products. It is observed that the strong rate of re-lets in the affordable rent stock is concealing the level of affordable rented need, and the very small amount of affordable home ownership homes in the NA currently is inflating affordable home ownership need. Whilst this imbalance should be redressed, it should not be done so by restricting the supply of affordable rented properties.
113. Affordable rented homes also require much lower income thresholds and reach those on dual lower quartile incomes. As discussed, even First Homes at 50% discount level only just reach average earner households. In cases such as these, it is generally best practice to prioritise reaching the most households, and affordable rented homes extend affordability to many lower income households. The greatest priority for the NA going forward is greater supply of social rent homes as these will meet the needs of the greatest number of people living locally, as well as ensure that a mixed demographic is retained in the Parish, a key aim of the Neighbourhood Planning group.
114. Therefore, having run independent models of affordable housing need, it is concluded that reverting to the LHNA mix is the best solution for the Neighbourhood Plan. This approach of 59% affordable rent, of which 45% social rent, and 41% affordable home ownership will help foster a more balanced tenure mix whilst also ensuring that the needs of those households in greatest need are prioritised.
115. In terms of our recommendations for the detailed breakdown of tenure mix, we recommend a 30% share of First Homes, offered at the maximum 50% discount rate. In the interests of diversity and maximizing choice, a further 11% is then allocated to shared ownership rather than more First Homes. Shared ownership has the advantage of requiring a smaller deposit and may therefore be useful to some households. Rent to buy does not feature in the recommended mix as market rents are not affordable to average income households locally. The breakdown of affordable housing for rent follows the LHNA recommended split, with 45% as social rent and 14% affordable rent.

5. RQ 2: Type and Size

RQ 2: What type (terrace, semi, bungalows, flats and detached) and size (number of bedrooms) of housing is appropriate for the Neighbourhood Area over the Neighbourhood Plan period?

Introduction

116. The evidence in this chapter is intended to give a snapshot of the existing dwelling stock in Stow on the Wold and the Swells in terms of type and size, as well as some of the population characteristics that tend to influence housing needs. From this, it is possible to develop an understanding of what sort of housing would be appropriate going forward.
117. It is worth emphasising that this evidence assumes that existing demographic and occupation patterns will persist into the future. It can therefore be thought of as the baseline or default scenario, into which the community may wish to intervene – for example to attract a different or more balanced demographic. The recommendations in this chapter, particularly the final suggested size mix, are a starting point that may be adjusted in light of other community objectives and primary evidence.

Existing types and sizes

Background and definitions

118. Before beginning to explore issues of dwelling type and size, it is important to note that the demand for housing by size and type tends to be determined primarily by wealth – with those having more buying power choosing to occupy larger homes, and often preferring detached properties to denser types, such as flats.
119. This study is concerned primarily with need rather than demand. Need for homes of different sizes is chiefly determined by the number of people occupying the home. In the strict sense, there is no ‘need’ for dwellings of any particular type, other than the specific needs of those with certain disabilities for level access properties, for example.
120. The best proxy for the number of people in a household is age or ‘life stage’, with younger and then older households tending to have one or two people, and those in between these poles more likely to have larger families including children. Life stage is therefore a main indicator considered here for the size of housing needed. But it is worth pointing out that wealth is also correlated with age, so it is not possible to attain a pure view of what is needed from the secondary data alone.
121. It is also useful to clarify the terminology around dwellings and households. Dwellings are counted in the Census by combining address information with Census returns on whether people’s accommodation is self-contained. As such,

all dwellings are classified as either shared or unshared dwellings. Households are groups of people who live together as a coherent unit (such as a family), and a dwelling is shared where there is more than one household occupying it (e.g. two families or a group of individual students). Hence, there is usually a different number of households and dwellings in any given area. The number of dwellings can also exceed that of households in areas with large numbers of holiday or second homes.

122. As noted in the Context section of this report, there is no perfect data source for the current mix of dwellings in the NA. For some aspects, such as the size mix of homes, adding together Census figures and completions data for the intervening period is highly accurate. For others, such as the type mix of homes, this method is not available and Valuation Office Agency (VOA) must be used. The most appropriate combination of approaches is used in this section.

Dwelling type

123. For the NA, the most accurate data on dwelling type available dates to 2011. Unfortunately, more recent VOA data covers a larger area than the NA such that the raw figures are not reliable, however, it is useful for percentages. The figures indicate that the NA has a well-balanced mix of dwelling types, unusually for a rural area. This includes a substantial number of flats.

Table 5-1: Accommodation type, Stow on the Wold and the Swells, 2011

Dwelling type	2011 (Census)
Flat	195
Terrace	354
Semi-detached	465
Detached	373
Total	1,387

Source: ONS 2011, AECOM Calculations

124. This table shows more recent VOA data. The proportion of dwelling types in the NA is generally very similar to the district wide average. It differs substantially from England in having a lower proportion of flats and higher proportion of detached homes, which is to be expected in a rural area.

Table 5-2: Accommodation type, various geographies, 2021

Dwelling type	NA	Cotswold	England
Bungalow	8.6%	8.3%	9.4%
Flat	11.8%	11.6%	23.2%
Terrace	22.2%	23.5%	26.3%
Semi-detached	24.4%	23.1%	23.8%
Detached	30.3%	30.9%	16.0%
Unknown/other	2.7%	2.6%	1.4%

Source: VOA 2021, AECOM Calculations

Dwelling size

125. In terms of size, the NA has a very well-balanced distribution of sizes, offering a great deal of choice, and seems to have avoided the overrepresentation of very large homes which can occur in rural areas.

Table 5-3: Dwelling size (bedrooms), Stow on the Wold and the Swells, 2011

Number of bedrooms	2011 (Census)
Studio	1
1	136
2	307
3	480
4	156
5+	71
Total	1,151

Source: ONS 2011, VOA 2021, AECOM Calculations

126. Again it is useful to look at the percentage breakdown of dwelling sizes in comparison with the wider district and country. This recent VOA data demonstrates that the NA has a healthy mix, comparable to national averages, with a slightly higher proportion of 4 and 5 bed properties.

Table 5-4: Dwelling size (bedrooms), various geographies, 2021

Number of bedrooms	NA	Cotswold	England
1	9.4%	8.3%	12.3%
2	26.4%	24.4%	28.1%
3	41.0%	41.7%	43.4%
4	15.6%	18.1%	12.2%
5+	7.6%	7.3%	3.3%
Unknown	0.0%	0.1%	0.6%

Source: VOA 2021, AECOM Calculations

Age and household composition

127. Having established the current stock profile of Stow on the Wold and the Swells and identified recent changes to it, the evidence gathered below examines the composition and age structure of households living in the NA. Many of these indicators have a bearing on what housing might be needed in future years.

Age structure

128. Table 5-5 on the following page shows the most recent estimated age structure of the NA population, alongside 2011 Census figures.
129. Note that ONS advises exercising caution with population estimates by single year of age (from which this 2020 data has been derived), as patterns of variance and bias make it relatively less accurate compared to Census data.
130. It is also worth noting that only the age structure of the population (individuals) can be brought up to date in this way. The life stage of households, which forms the basis of the subsequent analysis of future dwelling size needs, is not

estimated each year. The 2011 Census therefore remains the most accurate basis to use in those areas, and the brief comparison here demonstrates that the change from 2011-2020 has not been so significant as to invalidate the 2011 household data used in modelling later in this chapter.

131. In terms of changes, it does appear the population is ageing quite quickly, particularly regarding the increase of 65-84 year olds over the last decade. Concurrently, there has been a fall in the 0-15 and 25-44 age categories as a proportion of the population, and also in raw numbers.

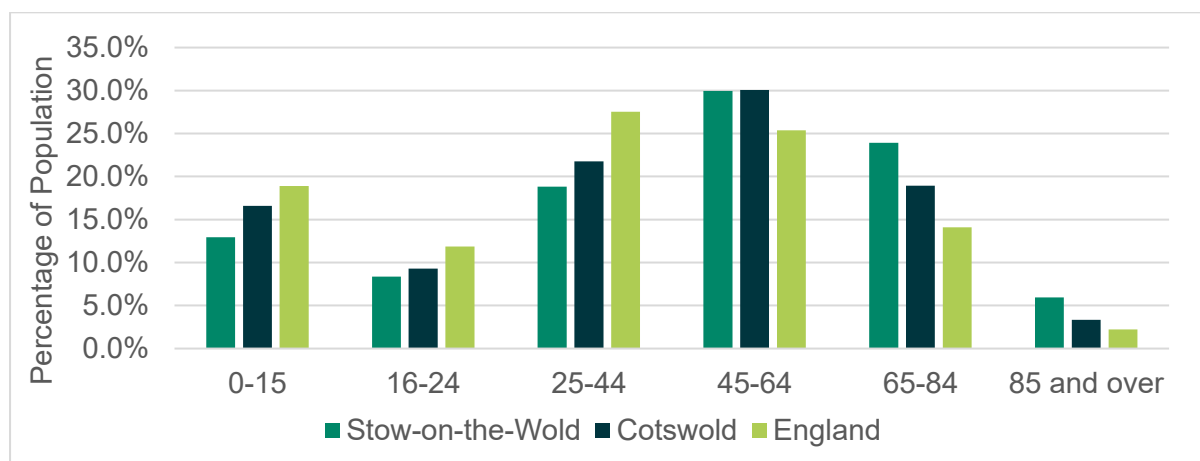
Table 5-5: Age structure of Stow on the Wold and the Swells population, 2011 and 2020

Age group	2011 (Census)		2020 (ONS, estimated)	
0-15	315	13.0%	241	10.6%
16-24	203	8.4%	185	8.1%
25-44	458	18.8%	329	14.4%
45-64	728	29.9%	692	30.4%
65-84	582	23.9%	676	29.7%
85 and over	145	6.0%	155	6.8%
Total	2,431	100%	2,278	100%

Source: ONS 2011, ONS mid-2020 population estimates, AECOM Calculations

132. For context, it is useful to look at the parish population structure alongside that of the district and country. Figure 5-1 below (using 2011 Census data) shows that the NA has a considerably older population profile than nationally, and at the district level. The proportion of population aged 65 and over is very high, and this has significant implications. The NA will need to attract more young couples and families to ensure more of a balanced age structure. This is a key aim as highlighted by the Neighbourhood Planning group to maintain the sustainability of the community.

Figure 5-1: Age structure in Stow on the Wold and the Swells, 2011



Source: ONS 2011, AECOM Calculations

Household composition

133. Household composition (i.e. the combination and relationships of adults and children in a dwelling) is an important factor in the size (and to an extent, the

type) of housing needed over the Neighbourhood Plan period. Table 5-6 shows that there are notably more one person households in the NA, particularly those aged 65 and over. There are fewer family households, particularly the dependent children category. This suggests that the NA may not be attracting as many incoming young families and there may be barriers to entry for these groups.

134. Between 2001 and 2011, there was a trend by which the NA saw a significant reduction of around 5% of households with dependent children, and a mirrored increase of 5% in the households with no children.
135. Note that non-dependent children refer to households in which adult children are living at home, or which students still call their primary residence despite living for most of the year near to university. A marked increase in this category can be taken to indicate the relative unaffordability of entry-level homes, where young people are financially unable to move out and form their own households. While the data is quite old at this point, it is interesting to observe that this category fell 1% between 2001 and 2011 in the NA – opposite the district average. Our perspective is that this potentially indicates worse issues, that young people are leaving the area entirely, as shown by the sharp fall in population aged 25-44 between 2011 and 2020.

Table 5-6: Household composition, Stow on the Wold and the Swells, 2011

Household composition		NA	Cotswold	England
One person household	Total	37.1%	30.2%	30.2%
	Aged 65 and over	21.8%	15.5%	12.4%
	Other	15.3%	14.8%	17.9%
One family only	Total	57.7%	65.0%	61.8%
	All aged 65 and over	13.3%	11.9%	8.1%
	With no children	18.8%	21.7%	17.6%
	With dependent children	17.6%	23.2%	26.5%
	All children Non-Dependent ¹³	8.0%	8.1%	9.6%
Other household types	Total	5.2%	4.8%	8.0%

Source: ONS 2011, AECOM Calculations

Occupancy ratings

136. The tendency of households to over- or under-occupy their homes is another relevant consideration to the future size needs of the NA. A person is considered to under-occupy their home when there are more bedrooms in their home than a family of their size and composition would normally be expected to need. This is

¹³ Refers to households containing children who are older than 18 e.g. students or young working people living at home.

expressed as an occupancy rating of +1 or +2, indicating that there is one surplus bedroom or at least two surplus bedrooms (respectively). Over-occupancy works in the same way, with a rating of -1 indicating at least one bedroom too few.

137. Under-occupancy is very high in the NA, especially among over 65 households and under 65 households without children. The level of under-occupancy is extremely high for families over 65, with 71% having two surplus bedrooms. This suggests the housing stock is being very inefficiently occupied. 61% of families without children have two or more surplus bedrooms. Meanwhile, rates of occupancy remain slightly lower among single households over 65, and much lower for families with children, although actually the majority have at least one spare bedroom.

Table 5-7: Occupancy rating by age in Stow on the Wold and the Swells, 2011

Household type	+2 rating	+1 rating	0 rating	-1 rating
Family 65+	70.6%	26.1%	3.3%	0.0%
Single person 65+	45.0%	31.5%	23.5%	0.0%
Family under 65 - no children	60.6%	28.7%	10.6%	0.0%
Family under 65 - dependent children	21.7%	39.4%	35.5%	3.4%
Family under 65 - adult children	29.3%	53.3%	17.4%	0.0%
Single person under 65	35.8%	36.9%	27.3%	0.0%
All households	43.35%	34.40%	21.03%	1.22%

Source: ONS 2011, ONS mid-2019 population estimates, AECOM Calculations

138. The Neighbourhood Plan Steering Group have identified a specific problem of second homes driving some of the affordability challenges as discussed in the previous chapter. It is therefore relevant to look at the percentage of dwellings in the area which might constitute second homes/holiday lets.
139. The best data to assess this is it look at the rate of non-occupied dwellings in the Parish. At the 2011 Census there were 236 non-occupied dwellings, when compared with the total number of households (1,387) this indicates 17% of the housing in the NA are second homes. Consideration must also be given to how this may have increased since 2011. The forthcoming Census data will will provide a clearer picture on this.
140. For comparison, the rate across Cotswolds as a whole was 9.3%. For England, the rate was 4.3%.

Dwelling mix determined by life-stage modelling

Suggested future dwelling size mix

141. As noted above, there is a strong link between the life stage of a household and the size of dwelling that household can be expected to need. The final part of this chapter presents the results of a model that aims to estimate the dwelling size needs of the parish at the end of the Neighbourhood Plan period. The steps involved in this model are not presented in full, but can be summarised – along with the underpinning assumptions and some limitations – as follows:

- The starting point is the age distribution of Stow on the Wold and the Swells households in 2011.
 - The life stage of a household is determined by the age of the household reference person (HRP), a more modern term for the head of household.
 - As noted above, household life stages are not estimated annually, so the older Census data must be used.
- This life stage data is then projected forward to the end of the Plan period by applying the growth rates for each household age group as suggested by the latest household projections. This allows for an estimate of how the parish population might evolve in future.
 - ONS household projections are produced every two years but are only available at Local Authority level. The growth rates are therefore applied to the 2011 starting household age profile of the NA.
- Next, we turn to a Census dataset that shows the occupation patterns or preferences of each household life stage (e.g. what proportion of households aged under 24 tend to live in 1 bedroom homes as opposed to 2, 3 or 4 bedroom homes). This data is mapped to the distribution of the projected NA population for each life stage and each dwelling size category to form a picture of what mix of homes might be appropriate in future.
 - This occupation data is again only available at Local Authority scale, so it does risk embedding any unusual characteristics present in the area.
 - The model also assumes that today's occupation patterns persist into the future, which is not a given, particularly with the change in preferences for home working space and other features arising from the Covid-19 pandemic. However, there is no better indication of what those patterns might look like. It is considered more appropriate to adjust the end mix that results from this model to reflect such trends than to build further speculative assumptions into the model.
- Finally, this 'ideal' future mix of dwelling sizes can be compared to the current stock of housing in the NA. From this we can identify how future development might best fill the gaps.
 - The 2011 dwelling size mix is used for consistency, so any imbalances in new development since then may justify adjustments to the final results.

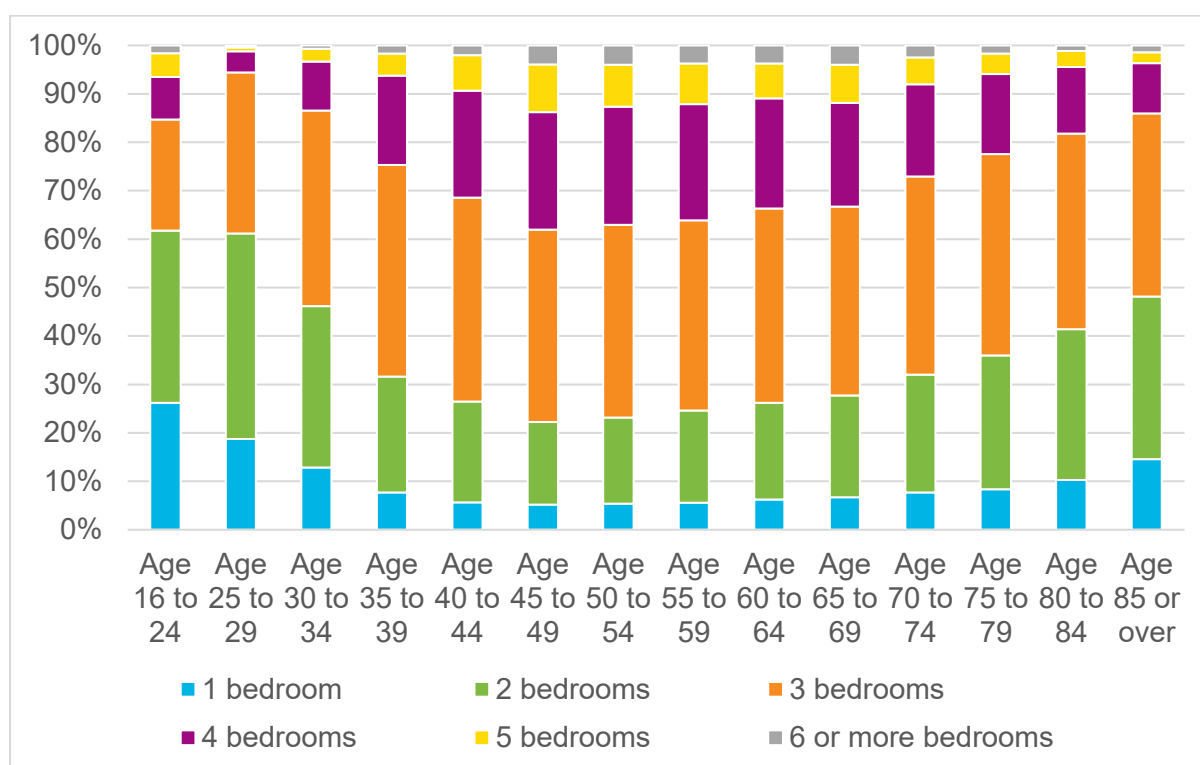
142. It is important to keep in mind that housing need is not an exact science and this exercise provides an estimate based on demographic trends and occupancy patterns alone. It does not take into account income and wealth, other than in an indirect way through the tendency of households to occupy more or less space than they 'need'. It also does not anticipate changes in how people may wish to occupy their homes in response to social and technological change.

143. The approach therefore embeds existing patterns of occupancy which may or may not be desirable. As such, it is appropriate for the result of this model to be taken as a baseline scenario – what would occur if current trends persisted. It may well be the intention of the community to intervene to produce a different

outcome more in line with their interpretation of emerging trends and their place- and community-shaping objectives. Layering these factors on top of the indicative picture provided by this model is considered entirely appropriate for the purpose of drafting neighbourhood plan policy.

144. Before presenting the results of this exercise, it may be interesting to review two of the inputs described above.
145. The first, given as Figure 5-2 below, sets out the relationship between household life stage and dwelling size for Cotswold District in 2011. This shows how the youngest households occupy the smallest dwellings, before rapidly taking up larger homes as their families expand, and then more gradually downsizing to smaller homes again as they age.

Figure 5-2: Age of household reference person by dwelling size in the Cotswold District, 2011



Source: ONS 2011, AECOM Calculations

146. The second dataset of note is the result of applying Local Authority level household projections to the age profile of Stow on the Wold and the Swells households in 2011 and the updated estimates of household numbers described in the bullets above. Table 5-8 below makes clear that population growth can be expected to be driven by the oldest households, with 65% growth between 2011 and the end of the plan period.

Table 5-8: Projected distribution of households by age of HRP, Stow on the Wold and the Swells

Year	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
2011	11	75	351	234	480

2031	12	84	360	263	790
% change 2011-2031	14%	11%	3%	12%	65%

Source: AECOM Calculations

147. The final result of this exercise is presented in Table 5-9 below. The model suggests that a split of 17% 2 bed, 33% 3 bed, 34% 4 bed and 16% 5 bed homes would be suitable.

Table 5-9: Suggested dwelling size mix to 2031, Stow on the Wold and the Swells

Number of bedrooms	Current mix (2011)	Target mix (2031)	Balance of new housing to reach target mix
1 bedroom	136	125	0.0%
2 bedrooms	307	369	16.8%
3 bedrooms	480	602	33.1%
4 bedrooms	156	283	34.4%
5 or more bedrooms	71	129	15.8%

Source: AECOM Calculations

148. It is never advisable to restrict future housing delivery to selected size categories only. The result of this model is a relatively blunt measure of what could be beneficial given population change and existing imbalances in housing options. It is a starting point for thinking about how best to address the more nuanced needs of the future population.
149. For example, the young starter families and downsizing older households mentioned above may both need 'mid-sized' homes, but are likely to have extremely different requirements and degrees of purchasing power. There is limited scope for Neighbourhood Planning policy to influence the more detailed characteristics of new housing, but additional guidance and prioritisation could be informed by further primary research.
150. The preceding chapter found that affordability is a serious and worsening challenge in the NA. While the provision of Affordable Housing (subsidised tenure products) is one way to combat this, another is to ensure that homes come forward which are of an appropriate size, type and density for local residents' budgets. Continuing to provide smaller homes with fewer bedrooms would help to address this situation.
151. To best meet the needs of the large cohort of older households expected to be present by the end of the Plan period, it should be considered whether the existing options are well tailored to older people's requirements in terms of space, flexibility, quality, location and accessibility. Variety should be sought within the mid-sized homes that come forward in future to attract both newly forming households on lower budgets and older households with substantial equity from their existing larger homes. Facilitating downsizing among older households may release those larger homes for use by families who need more bedrooms.

152. That said, it may not be realistic to expect growing families to be able to afford the larger detached homes that are currently under-occupied in the NA. Reducing the issue of dwelling size to a number of bedrooms is potentially unhelpful in this case. There may be a strong justification to continue supplying larger homes despite their abundance because a different kind of larger home is needed to accommodate growing families with less buying power. This is too speculative to quantify in a percentage size mix, but is among the good reasons not to inhibit any size of dwelling entirely.
153. More generally, it would be unwise for any new housing that does come forward to be delivered in an unbalanced way. Those wishing to move within or relocate to the area will have a range of circumstances and preferences, and they should be offered a range of choices. As such, it is recommended that priority is given to smaller/larger/mid-sized homes but that this is done to a degree that aligns with the wider objectives of the community and does not limit choice or threaten viability. The evidence in this section represents a starting point for further thought and consultation.

Conclusions- Type and Size

154. This study provides an indication of the likely need for different types and sizes of homes based on demographic change. It is important to remember that other factors should be considered in determining the dwelling mix that is desirable in the parish or on any particular site. These include the specific characteristics of the nearby stock of housing (such as its condition and design), the role of the NA or site within the wider housing market area (linked to any Local Authority strategies or plans) and site-specific factors which may justify a particular dwelling mix.
155. There are some very positive aspects to the housing mix in the NA, and some concerning demographic indicators which reflect the heightened affordability issues in the NA. At first glance, the figures indicate that the NA has a well-balanced mix of dwelling types, unusually for a rural area. This includes a substantial number of flats. In terms of size, the NA has a very well-balanced distribution of sizes, offering a great deal of choice, and seems to have avoided the overrepresentation of very large homes which can occur in rural areas.
156. In terms of changes, it does appear the population is ageing quite quickly, from an already much older population profile than would be expected nationally or at the district level, it is particularly worth noting the increase of 65-84 year olds over the last decade. Concurrently, there has been a fall in the 0-15 and 25-44 age categories as a proportion of population, and also in raw numbers. The fall of 25-44 year olds from 458 to 329 between 2011 and 2020 is concerning because this comprises the bulk of families with children, indicating further future demographic imbalances.
157. The data indicates that young families are leaving the area and are being priced out by the lack of affordable homes. The proportion of population aged 65 and

over is very high, and this has significant implications. The NA will need to attract more young couples and families to ensure more of a balanced age structure.

158. Under-occupancy is very high in the NA, especially among over 65 households and under 65 households without children. The level of under-occupancy is extremely high for families over 65, with 71% having two surplus bedrooms. This suggests the housing stock is being very inefficiently occupied. 61% of families without children have two surplus bedrooms. Meanwhile, rates of occupancy remain slightly lower among single households over 65, and much lower for families with children, although actually the majority have at least one spare bedroom.
159. The Census 2011 suggests that there is a high level of second homes in the Parish, a total of 236, accounting for 17% of the housing stock. This rate may have also increased since 2011 and the forthcoming census data will provide a clearer picture on this.
160. An increase in second home ownership can often be associated with increasing affordability challenges, which are apparent in the NA as outlined in Chapter 4. It is possible to apply principle residence restrictions to development in the parishes (or neighbourhood area as a whole) if, in the 2021 or 'latest' Census, a certain proportion of housing that is not usually occupied is exceeded, or if a certain rate of increase is observed on the 2011 figures. What those thresholds might be should be determined with reference to the evidence underpinning adopted policies in nearby or similar neighbourhood plans.
161. Our life-stage modelling suggests that a split of 17% 2 bed, 33% 3 bed, 34% 4 bed and 16% 5 bed homes would be suitable to help best meet needs of the plan period. This will provide more homes suitable for families with children, which are a key demographic to ensure that the population of the NA does not age as rapidly as it has in recent years.

6. RQ 3: Specialist housing for older people

RQ 3: What provision should be made for specialist housing for older and disabled people over the Neighbourhood Plan period?

Introduction

162. This chapter considers in detail the specialist housing needs of older and disabled people in Stow on the Wold and the Swells. The level of care associated with specialist housing products can vary widely, and is broadly categorised, in descending order from highest to lowest care level, as follows
- Specialist schemes that have 24-hour onsite care and support, typically including onsite catering (e.g. extra care, flexicare, and enhanced care);
 - Specialist housing that is designed with the relevant group in mind. This may be suitable for receiving care or support, but this is not typically provided onsite or at all times of day (e.g. sheltered housing); and
 - Mainstream housing that is adapted or capable of adaptation so that the inhabitant can live independently and care or support can be provided in the home.
163. People experience ageing differently. Much depends on their health, lifestyle and relationship with work. Some people live healthy and active lives into advanced old age while others may need support and care much earlier in their lives. Some will be interested in moving to a suitable home closer to services while for others ageing independently in place will be key to their wellbeing.
164. Because of the wide variation in the level of support needed, as well as the financial capabilities of those affected, the estimates of need presented here should be viewed with caution – as an idea of the broad scale of potential need rather than an obligatory target that must be met.
165. The specialist housing needs of older people (75+) are assessed below using two methods. The first is a tenure-led projection, based on rates of mobility limitation among this age group and the tenure of housing they currently occupy. The second, included for the purposes of comparison, is based on the Housing Learning and Improvement Network (HLIN) Strategic Housing for Older People (SHOP) tool,¹⁴ which is based on best practice nationally and sets a recommended level of provision per 1,000 head of population.
166. It is important to note that the need for housing for particular groups of people may well exceed, or be proportionally high in relation to, the total housing need or requirement. This is because the needs of particular groups will often be

¹⁴ Available at [https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/S
HOP/SHOPv2/](https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPv2/)

calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for estimating housing need overall.¹⁵

167. This study covers the need for housing, i.e. buildings that the planning system classifies as Use Class C3 (private dwellings).¹⁶ Residences that fall into Use Class C2 (institutions including prisons, boarding schools and some care homes for the elderly) are not within the scope of this research. Unfortunately, however, the dividing line between care homes for older people that fall into use class C2 and those where accommodation is counted as C3 is blurred. As such, the findings of this chapter may justify the provision of extra-care C3 housing and/or C2 care home units, but it is not possible to state definitively how much of each would be required.

Current supply of specialist housing for older people

168. When determining a final target for the need for specialist dwellings, it is necessary first to take account of current supply. Information on the current stock is collated manually using the search function on the Elderly Accommodation Counsel's Website: <http://www.housingcare.org>.
169. Table 6-1 on the following page counts a total of 251 units of specialist accommodation in the NA at present, of which 64 units, or 25%, are offered for social rent, the rest a mixture of leasehold, freehold, market rent and shared ownership. Of the 251 units, 187 units, or 75%, have on-site care provision.
170. It must be noted that the units on each site differ in size, the Neighbourhood Plan group have highlighted that much of the existing provision include larger accommodation of 2 and 3 bedrooms. In addition, they have noted the lack of affordability in the existing provision for local people, with many of the units being rented or purchased by elderly people moving into the area.
171. ONS 2020 population estimates suggest that there are currently around 440 individuals aged 75 or over in Stow on the Wold and the Swells. This suggests that current provision is in the region of 570 units per 1,000 of the 75+ population (a common measure of specialist housing supply).

Table 6-1: Existing specialist housing for the elderly in Stow on the Wold and the Swells

Name	Description	Units	Tenure	Type
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¹⁵ See Paragraph: 017 Reference ID: 2a-017-20190220, at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>)

¹⁶ For a full description of Planning Use Classes, please refer to https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

1	Newlands of Stow	Retirement housing / housing-with-care / close care housing	37	Leasehold and freehold	Housing with care
2	Brio Beechwood Park	Extra care housing	106	Leasehold, market rent and shared ownership	Housing with care
3	Abbeyfield House	Retirement housing	8	Rent (social landlord)	Retirement housing
4	Bartletts Park	Age exclusive housing	9	Rent (social landlord)	Retirement housing
5	Chamberlayne House	Retirement housing	15	Rent (social landlord)	Retirement housing
6	Fisher House	Retirement housing	32	Rent (social landlord)	Retirement housing
7	Hawkesbury Place	Extra care housing	44	Leasehold, market rent and shared ownership	Housing with care

Source: <http://www.housingcare.org>

Tenure-led projections

172. Turning to determining future need for specialist housing, the first step is to review data on the tenure of households aged 55-75 across the Cotswold District, as this is the most recent and smallest geography for which tenure by age bracket data is available.
173. The 2011 55-75 age bracket is considered the best proxy for the group likely to fall into need for specialist accommodation during the Plan period to 2031. It is assumed that those currently occupying their own home will wish to do so for as long as practicably possible in future, even where downsizing or moving into specialist accommodation. Equally, those who currently rent, either in the private or social sectors, are projected to need affordable rented specialist accommodation.
174. According to Table 6-2 on the following page, roughly three quarters of households are owner occupied and one quarter are rented, of which 12% social rent.

Table 6-2: Tenure of households aged 55-75 in the Cotswold District, 2011

All owned	Owned outright	Owned with a mortgage or loan or	All Rented	Social rented	Private rented	Living rent free
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Shared Ownership						
75.8%	54.3%	21.5%	24.2%	12.4%	9.1%	2.7%

Source: Census 2011

175. The next step is to project how the overall number of older people in Stow on the Wold and the Swells is likely to change in future, by extrapolating from the ONS Sub-National Population Projections for the Cotswold District at the end of the Plan period. The figure must be extrapolated from the Local Authority level data because such projections are not available at neighbourhood level. The results are set out in Table 6-3 below. This shows growth of 203 in the population aged over 75 over the plan period.

Table 6-3: Modelled projection of elderly population in Stow on the Wold and the Swells by end of Plan period

Age group	2020	2031		
	NA (ONS 2020)	Cotswold (ONS 2020)	NA (AECOM)	Cotswold (ONS SNPP 2018)
All ages	2,278	90,264	2,635	104,399
75+	440	11,194	643	16,346
%	19.3%	12.4%	24.4%	15.7%

Source: ONS SNPP 2018, AECOM Calculations

176. A key assumption for the next stages of the calculation is that the older people living in the NA currently are already suitably accommodated, either because they occupy the existing stock of specialist accommodation, have made appropriate adaptations to their own homes or do not require support or adaptations. This is unlikely to be completely true, but it is not possible to determine how many such individuals are inadequately housed without evidence from a household survey (which itself may not give a complete picture).
177. The people whose needs are the focus of the subsequent analysis are therefore the additional 203 individuals expected to join the 75+ age group by the end of the Plan period. This figure should also be converted into households with reference to the average number of people per household with a life stage of 75+ in Cotswold District in 2011 (the smallest and most recent dataset to capture households). In 2011 there were 9,063 individuals aged 75+ and 6,502 households headed by a person in that age group. The average household size is therefore 1.39, and the projected growth of 203 75+ people in Stow on the Wold and the Swells can be estimated to be formed into around 146 households.
178. The next step is to multiply this figure by the percentages of 55-75 year olds occupying each tenure (shown in the table above). This is set out in Table 6-4 below. This provides a breakdown of which tenures those households are likely to need.

Table 6-4: Projected tenure of households aged 75+ in Stow on the Wold and the Swells to the end of the Plan period

Owned	Owned outright	Owned with a mortgage or loan or shared ownership	All rented	Social rented	Private rented	Living rent free
110	79	31	35	18	13	4

Source: Census 2011, ONS SNPP 2018, AECOM Calculations

179. Next, rates of disability by tenure are considered. The tendency for people in rented housing to have higher disability levels is well established. It arises partly because people with more limiting disabilities tend to have lower incomes. It also reflects the fact that as people develop support and care needs they may find that the only suitable and affordable option to them is available in the social rented sector. Table 6-5 below presents this data for Stow on the Wold and the Swells from the 2011 Census. Note that the closest proxy for the 75+ age group in the Census is the 65+ age group.

Table 6-5: Tenure and mobility limitations of those aged 65+ in Stow on the Wold and the Swells, 2011

Tenure	All categories: Long-term health problem or disability	Day-to-day activities limited a lot		Day-to-day activities limited a little		Day-to-day activities not limited	
All categories: Tenure	674	132	19.6%	192	28.5%	350	51.9%
Owned or shared ownership: Total	498	76	15.3%	148	29.7%	274	55.0%
Owned: Owned outright	448	71	15.8%	134	29.9%	243	54.2%
Owned: Owned with a mortgage or loan or shared ownership	50	5	10.0%	14	28.0%	31	62.0%
Rented or living rent free: Total	176	56	31.8%	44	25.0%	76	43.2%
Rented: Social rented	124	42	33.9%	29	23.4%	53	42.7%
Rented: Private rented or living rent free	52	14	26.9%	15	28.8%	23	44.2%

Source: DC3408EW Health status

180. It is now possible to multiply the projected number of 75+ households occupying each tenure by the rates of mobility limitation for that tenure to arrive at the final tenure-led estimate for specialist housing needs. The number of households

falling into potential need for specialist accommodation over the Plan period is 70.

181. These findings are set out in the table below, based on the assumption that those whose day-to-day activities are limited a lot may need housing with care (e.g. extra care housing, with significant on-site services, including potentially medical services), while those with their day to day activities limited only a little may simply need adaptations to their existing homes, or alternatively sheltered or retirement living that can provide some degree of oversight or additional services. However, it is important to note that, even those people who have high support or care needs can often be supported to live in their own homes. This is often reflected in policy of local authorities, with explicit aim to reduce the need to commission increasing numbers of care home beds.

Table 6-6: AECOM estimate of specialist housing need in Stow on the Wold and the Swells by the end of the Plan period

Type	Affordable	Market	Total (rounded)
Housing with care (e.g. extra care)	Multiply the number of people across all rented tenures (not just social rent as those aged 65+ who need to rent are overwhelmingly likely to need Affordable Housing) by the percent of occupiers in that tenure who have day to day activity limitations limited a lot	Multiply the number of people across all owner-occupied housing by the percent of occupiers in that tenure who have day to day activity limitations limited a lot	28
	11	17	
Adaptations, sheltered, or retirement living	Multiply the number of people across all rented housing by the percent of occupiers in that tenure who have day to day activity limitations limited a little	Multiply the number of people across all owned housing by the percent of occupiers in that tenure who have day to day activity limitations limited a little	42
	9	33	
Total	20	50	70

Source: Census 2011, AECOM Calculations

Housing LIN-recommended provision

182. It is worth comparing these findings with the recommendations of the Housing Learning and Improvement Network (HLIN), one of the most simple and widely used models estimating for the housing needs of older people. Table 6-7 below reproduces the key assumptions of HLIN's Strategic Housing for Older People (SHOP) toolkit. The table serves as a guide to the numbers of specialist dwellings for older people that should be provided given the increase in their

numbers over the Plan period, and how these should be split into the different tenures.

183. It is worth highlighting that the HLIN model suggests that the level of unmet demand for specialist housing for older people of all kinds is approximately 251 units per 1,000 of the population aged 75+.

Table 6-7: Recommended provision of specialist housing for older people from the SHOP toolkit

FORM OF PROVISION	ESTIMATE OF DEMAND PER THOUSAND OF THE RELEVANT 75+ POPULATION
Conventional sheltered housing to rent	60
Leasehold sheltered housing	120
Enhanced sheltered housing (divided 50:50 between that for rent and that for sale) ³⁶	20
Extra care housing for rent	15
Extra care housing for sale	30
Housing based provision for dementia	6

Source: *Housing LIN SHOP Toolkit*

184. As Table 6-3 shows, Stow on the Wold and the Swells is forecast to see an increase of 203 individuals aged 75+ by the end of the Plan period. According to the HLIN tool, this translates into need as follows:
- Conventional sheltered housing to rent = $60 \times 0.203 = 12$
 - Leasehold sheltered housing = $120 \times 0.203 = 24$
 - Enhanced sheltered housing (divided 50:50 between that for rent and that for sale) = $20 \times 0.203 = 4$
 - Extra care housing for rent = $15 \times 0.203 = 3$
 - Extra care housing for sale = $30 \times 0.203 = 6$
 - Housing based provision for dementia = $6 \times 0.203 = 1$
185. This produces an overall total of 51 specialist dwellings which might be required by the end of the plan period.
186. Table 6-8 on the following page sets out the HLIN recommendations in the same format as Table 6-6 on the previous page. It is important to stress that the SHOP toolkit embeds assumptions that uplift the provision of specialist accommodation compared to current rates.

Table 6-8: HLIN estimate of specialist housing need in Stow on the Wold and the Swells by the end of the Plan period

Type	Affordable	Market	Total
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Housing with care (e.g. extra care)	Includes: enhanced sheltered housing for rent + extra care housing for rent + housing based provision for dementia	Includes: enhanced sheltered housing for sale + extra care housing for sale	14
	6	8	
Sheltered housing	Conventional sheltered housing for rent	Leasehold sheltered housing	36
	12	24	
Total	18	32	51

Source: Housing LIN, AECOM calculations

Conclusions- Specialist Housing for the Older People

187. The NA has a relatively high amount of existing specialist housing, with 251 units, of which 187 have on-site care provision. However, the NA is also forecast to have significant growth in the population aged over 75, with 203 additional individuals over the plan period, meaning a total population aged over 75 of 643. At present, there are 570 units per 1,000 population aged 75+ but without any additional provision, this would fall significantly to 390 units per 1,000 population.
188. The potential need for specialist housing with some form of additional care for older people can be estimated by bringing together data on population projections, rates of disability, and what tenure of housing the current 55-75 cohort occupy in the NA. This can be sense-checked using a toolkit based on national research and assumptions.
189. These two methods of estimating the future need in Stow on the Wold and the Swells produce a range of 51 to 70 specialist accommodation units that might be required during the Plan period, of which 18 to 20 affordable. These estimates are based on the projected growth of the older population, thereby assuming that today's older households are already well accommodated. If this is found not to be the case, it would justify aspiring to exceed the range identified here.
190. This can be broken down to a recommendation for between 14 and 28 housing with care units, and 36 to 42 units of retirement housing.
191. Additionally, the affordability of such additional housing needs to be considered to ensure that it is accessible to the local community. 18 to 20 of the units should be affordable to meet identified local needs.
192. Local Plan policy H4 provides explicit encouragement for development to accommodate specific groups such as older people. However, it does not set specific targets for the proportion of new housing that might be required to meet national standards for accessibility and adaptability (Category M4(2)), or for wheelchair users (Category M4(3)). The evidence gathered here would appear to justify applying such a target in the Neighbourhood Plan if this avenue has the support of the LPA.

193. It is relatively common for Local and Neighbourhood Plans to require that all or a majority of new housing meets Category M4(2) standards in response to the demographic shifts being observed nationwide, and the localised evidence gathered here would further justify this. The proportion of new housing that might accommodate those using wheelchairs might be set with reference to the proportion of affordable housing applicants falling into this category and/or evidence from a household survey.
194. While it is important to maximise the accessibility of all new housing, it is particularly important for specialist housing for older people to be provided in sustainable, accessible locations, for a number of reasons, as follows:
- so that residents, who often lack cars of their own, are able to access local services and facilities, such as shops and doctor's surgeries, on foot;
 - so that any staff working there have the choice to access their workplace by more sustainable transport modes; and
 - so that family members and other visitors have the choice to access relatives and friends living in specialist accommodation by more sustainable transport modes.
195. Alongside the need for specialist housing to be provided in accessible locations, another important requirement is for cost effectiveness and economies of scale. This can be achieved by serving the specialist elderly housing needs arising from a number of different locations and/or Neighbourhood Areas from a single, centralised point (i.e. what is sometimes referred to as a 'hub-and-spoke' model).
196. It is considered that Stow on the Wold and the Swells is, in broad terms, a suitable location for specialist accommodation on the basis of the accessibility criteria and the considerations of cost-effectiveness above. As such, there is potential for such accommodation to be provided within the Neighbourhood Area (while noting there is no specific requirement or obligation to do so if there is potential to meet need arising from Stow on the Wold and the Swells in other suitable locations near to but outside the Plan area boundaries). Where it is considered for any reason desirable to meet some of the specialist need outside the Neighbourhood Area boundaries, there will be a degree of overlap between the number of specialist dwellings to be provided and the overall dwellings target for the Neighbourhood Area itself.
197. Wherever specialist housing is to be accommodated, partnership working with specialist developers is recommended, so as to introduce a greater degree of choice into the housing options for older people who wish to move in later life.

7. Conclusions

Overview

198. Table 7-1 below sets out in full the conclusions and recommendations of this Neighbourhood Plan housing needs assessment, based on the evidence reviewed and analysed.

Table 7-1: Summary of study findings specific to Stow on the Wold and the Swells with a potential impact on Neighbourhood Plan housing policies

Issue	Summary of evidence and data assessed	Conclusions and recommendations
Quantity of affordable housing to plan for	The first source of analysis is the most recent LHNA, produced for the six Gloucestershire local authorities in 2020. The LHNA identifies the need for 125 additional affordable homes each year in Cotswold District as a whole, for the period 2021 - 2041. The report breaks this down to a need for 56 social rent homes a year, 18 affordable rent homes a year and 51 affordable home ownership product homes a year.	When the LHNA figures are pro-rated to Stow on the Wold and the Swells based on its fair share of the population (2.93% of the LPA's population), this equates to 4 homes per annum (rounded) or 37 homes over the Neighbourhood Plan period (2021-2031). Following the LHNA distribution of need by affordable sub-tenure, this would indicate 17 homes for social rent, 5 homes for affordable rent, therefore 22 rented homes in total, and 15 affordable owned homes over the plan period.

<p>Housing tenure and affordability</p>	<p>Stow -on-the-Wold has a higher proportion of social rented and lower proportion of private rented occupancy than both local and national averages.</p> <p>Data on house prices shows an overall trend of high price growth, with mean prices having increased 35% between 2011 and 2020 and median prices having increased 15%. The high divergence between mean and median growth can be explained by the increase of exceptionally expensive property sales over time which skews the mean above the median. There is also a large gap between the lower quartile and the median, demonstrating that a notable proportion of properties in the NA remain considerably cheaper than average.</p> <p>Detached houses had much more rapid price growth than other types at 58%, adding to the data signal that the largest and most expensive properties are leading price growth. Terraced properties had the lowest price growth of just 5%.</p> <p>It appears that local households on average incomes are unable to access even entry-level homes unless they have the advantage of a very large deposit. The median house price would require an annual income 56% higher than the current average, and an entry-level house price would require an annual income 43% higher. This demonstrates that the NA has severe issues with housing affordability. Private renting is generally only affordable to higher than average earners.</p> <p>There is a relatively large group of households in Stow on the Wold and the Swells who may be able to afford to rent privately but cannot afford home ownership. They are typically earning between around £50,949 per year (at which point entry-level rents become affordable) and £75,857 (at which point entry-level market sale homes become affordable). This 'can rent, can't buy' cohort may benefit from the range of affordable home ownership products such as First Homes and shared ownership.</p> <p>Affordable rented housing is generally affordable to households with two lower earners depending on their household size (average earning households are unlikely to be eligible). However, households with a single lower earner appear unable to afford any of the tenures considered including the smallest socially rented units. Many such individuals will, if unable to secure a social rented dwelling require additional subsidy through Housing Benefit to access housing.</p>	<p>This report has estimated the income required to afford First Homes and tested the implications of 30%, 40% and 50% discount levels. Even the 50% discount level would only marginally bring average earner households within reach of being able to afford a home, and is unfortunately not in reach of dual lower quartile earner households. There is certainly evidence to require the maximum 50% discount level in the case of the NA, but owing to the extent of affordability issues, this will only just bring average earners within reach of home ownership.</p> <p>When testing our own models of the need for affordable homes by rent and as home ownership products, it appeared that the need was skewed towards home ownership products. It is observed that the strong rate of re-lets in the affordable rent stock is concealing the level of affordable rented need, and the very small amount of affordable home ownership homes in the NA currently is inflating affordable home ownership need. Whilst this imbalance should be redressed, it should not be done so by restricting the supply of affordable rented properties.</p> <p>Affordable rented homes also require much lower income thresholds and reach those on dual lower quartile incomes. As discussed, even First Homes at 50% discount level only just reach average earner households. In cases such as these, it is generally best practice to prioritise reaching the most households, and affordable rented homes extend affordability to many lower income households.</p> <p>Therefore, having run independent models of affordable housing need, it is concluded that reverting to the LHNA mix is the best solution for the Neighbourhood Plan. This approach of 59% affordable rent and 41% affordable home ownership will help foster a more balanced tenure mix whilst also ensuring that the needs of those households in greatest need are prioritised.</p> <p>In terms of our recommendations for the detailed breakdown of tenure mix, we recommend a 30% share of First Homes, offered at the maximum 50% discount rate. In the interests of diversity and maximizing choice, a further 11% is then allocated to shared ownership rather than more First Homes. Shared ownership has the advantage of requiring a smaller deposit and may therefore be useful to some households. Rent to buy does not feature in the recommended mix as market rents are not affordable to average income households locally. The breakdown of affordable housing for rent</p>
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Issue	Summary of evidence and data assessed	Conclusions and recommendations
		follows the LHNA recommended split, with 45% as social rent and 14% affordable rent.
Housing type and size	<p>The NA has a well balanced mix of dwelling types, unusually for a rural area. This includes a substantial number of flats. In terms of size, The NA has a very well balanced distribution of sizes, offering a great deal of choice, and seems to have avoided the overrepresentation of very large homes which can occur in rural areas.</p> <p>In terms of changes, it does appear the population is ageing quite quickly, from an already much older population profile than would be expected nationally or at the district level, it is particularly worth noting the increase of 65-84 year olds over the last decade. Concurrently, there has been a fall in the 0-15 and 25-44 age categories as a proportion of population, and also in raw numbers. The fall of 25-44 year olds from 458 to 329 between 2011 and 2020 is concerning because this comprises the bulk of families with children, indicating further future demographic imbalances.</p> <p>Under-occupancy is very high in the NA, especially among over 65 households and under 65 households without children.</p> <p>The Census 2011 suggests that there is a high level of second homes in the Parish, a total of 236, accounting for 17% of the housing stock. This rate may have also increased since 2011 and the forthcoming census data will provide a clearer picture on this.</p>	<p>There are some very positive aspects to the housing mix in the NA, and some concerning demographic indicators which reflect the heightened affordability issues in the NA.</p> <p>The data indicates that young families are leaving the area and are being priced out by the lack of affordable homes. The proportion of population aged 65 and over is very high, and this has significant implications. The NA will need to attract more young couples and families to ensure more of a balanced age structure.</p> <p>Our life-stage modelling suggests that a split of 17% 2 bed, 33% 3 bed, 34% 4 bed and 16% 5 bed homes would be suitable to help best meet needs of the plan period. This will provide more homes suitable for families with children, which are a key demographic to ensure that the population of the NA does not age as rapidly as it has in recent years.</p>

Issue	Summary of evidence and data assessed	Conclusions and recommendations
Specialist housing for older people	<p>The NA has a relatively high amount of existing specialist housing, with 251 units, of which 187 have on-site care provision. However, the NA is also forecast to have significant growth in the population aged over 75, with 203 additional individuals over the plan period, meaning a total population aged over 75 of 643. At present, there are 570 units per 1,000 population aged 75+ but without any additional provision, this would fall significantly to 390 units per 1,000 population.</p>	<p>Two methods of estimating the future need in Stow on the Wold and the Swells produce a range of 51 to 70 specialist accommodation units that might be required during the Plan period. These estimates are based on the projected growth of the older population, thereby assuming that today's older households are already well accommodated. If this is found not to be the case, it would justify aspiring to exceed the range identified here.</p> <p>This can be broken down to a recommendation for between 14 and 28 housing with care units, and 36 to 42 units of retirement housing.</p> <p>Local Plan policy H4 provides explicit encouragement for development to accommodate specific groups such as older people. However, it does not set specific targets for the proportion of new housing that might be required to meet national standards for accessibility and adaptability (Category M4(2)), or for wheelchair users (Category M4(3)). The evidence gathered here would appear to justify applying such a target in the Neighbourhood Plan if this avenue has the support of the LPA.</p>

Recommendations for next steps

199. This Neighbourhood Plan housing needs assessment aims to provide Stow on the Wold and the Swells with evidence on a range of housing trends and issues from a range of relevant sources. We recommend that the neighbourhood planners should, as a next step, discuss the contents and conclusions with the Cotswold District with a view to agreeing and formulating draft housing policies, bearing the following in mind:
- All Neighbourhood Planning Basic Conditions, but in particular Condition E, which is the need for the Neighbourhood Plan to be in general conformity with the strategic policies of the adopted development plan;
 - The views of the Cotswold District Council;
 - The views of local residents;
 - The views of other relevant local stakeholders, including housing developers and estate agents; and
 - The numerous supply-side considerations, including local environmental constraints, the location and characteristics of suitable land, and any capacity work carried out by the Cotswold District.
200. This assessment has been provided in good faith by AECOM consultants on the basis of housing data, national guidance and other relevant and available information current at the time of writing.

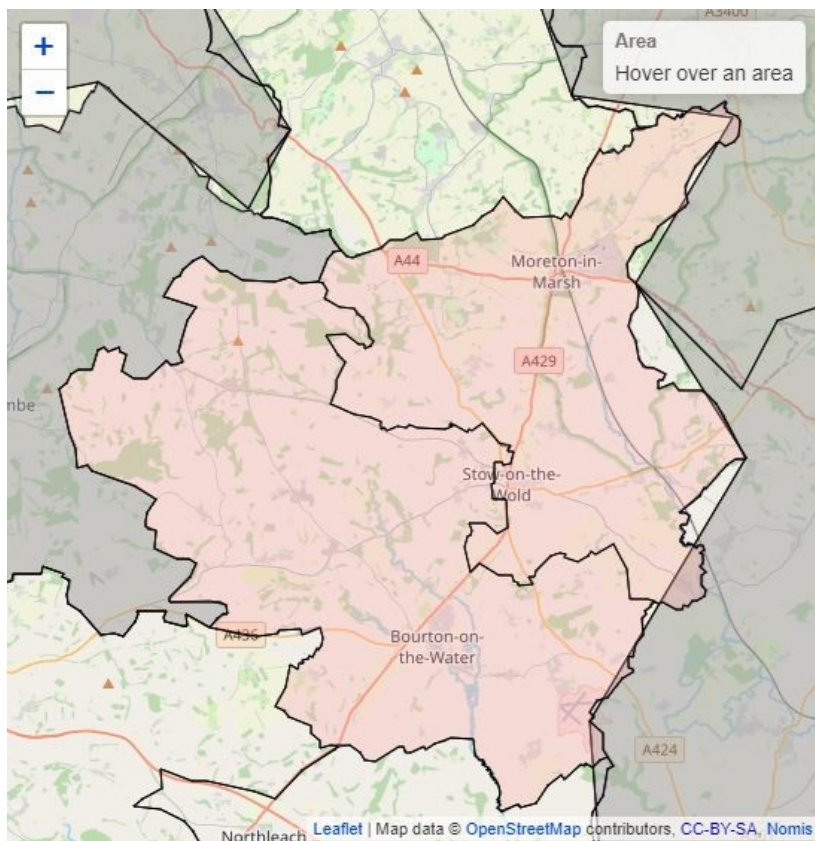
201. Bearing this in mind, it is recommended that the Neighbourhood Plan steering group should monitor carefully strategies and documents with an impact on housing policy produced by the Government, the Cotswold District or any other relevant party and review the Neighbourhood Plan accordingly to ensure that general conformity is maintained.
202. At the same time, monitoring on-going demographic or other trends over the Neighbourhood Plan period will help ensure the continued relevance and credibility of its policies.

Appendix A : Calculation of Affordability Thresholds

A.1 Assessment geography

203. As noted in the Tenure and Affordability chapter above, affordability thresholds can only be calculated on the basis of data on incomes across the Neighbourhood Area. Such data is available at MSOA level but not at the level of Neighbourhood Areas.
204. As such, when calculating affordability thresholds, an MSOA needs to be selected that is a best-fit proxy for the Neighbourhood Area. In the case of Stow on the Wold and the Swells, it is considered that MSOAs E02004616 Cotswold 002 and E02004617 Cotswold 003 are the closest realistic proxy for the Neighbourhood Area boundary, and as such, this is the assessment geography that has been selected. A map of both E02004616 and E02004617 appears below in Figure A-1. The NA straddles the two MSOAs and it is therefore the best-fit geography available. It is important to reflect that the assessment geography for average income includes settlements with different characteristics to Stow on the Wold and the Swells, as Moreton-in-Marsh and Bourton-on-the-Water have seen more growth than the NA in recent years.

Figure A-1: MSOAs E02004616 and E02004617 used as a best-fit geographical proxy for the Neighbourhood Area



Source: ONS

A.2 Market housing

205. Market housing is not subsidised, and tends to be primarily accessible to people on higher incomes.
206. To determine affordability in market housing, this assessment considers two primary indicators: income thresholds, which denote the maximum share of a family's income that should be spent on accommodation costs, and purchase thresholds, which denote the standard household income required to access mortgage products.

i) Market sales

207. The starting point for calculating the affordability of a dwelling for sale (i.e. the purchase threshold) from the perspective of a specific household is the loan to income ratio which most mortgage companies are prepared to agree. This ratio is conservatively estimated to be 3.5.
208. To produce a more accurate assessment of affordability, the savings required for a deposit should be taken into account in addition to the costs of servicing a mortgage. However, unlike for incomes, data is not available for the savings available to households in Stow on the Wold and the Swells, and the precise deposit a mortgage provider will require of any buyer will be determined by their individual circumstances and the state of the mortgage market. An assumption is therefore made that a 10% purchase deposit is required and is available to the prospective buyer. In reality it is possible that the cost of the deposit is a greater barrier to home ownership than the mortgage costs.
209. The calculation for the purchase threshold for market housing is as follows:
- Value of a median NA house price (2020) = £375,000;
 - Purchase deposit at 10% of value = £37,500;
 - Value of dwelling for mortgage purposes = £337,500;
 - Divided by loan to income ratio of 3.5 = purchase threshold of £96,429.
210. The purchase threshold for an entry-level dwelling is a better representation of affordability to those with lower incomes or savings, such as first-time buyers. To determine this threshold, the same calculation is repeated but with reference to the lower quartile rather than the median house price. The lower quartile average in 2020 was £295,000, and the purchase threshold is therefore £75,857.
211. Finally, it is worth assessing the purchase threshold for new build homes, since this most closely represents the cost of the new housing that will come forward in future. Land Registry records 88 sales of new build properties across Cotswold District in 2020. The NA sample was too small and unreliable at 2 properties only. The median new build house price in the district was £410,000, and the purchase threshold is therefore £105,429.

ii) Private Rented Sector (PRS)

212. Income thresholds are used to calculate the affordability of rented and affordable housing tenures. It is assumed here that rented housing is affordable if the annual rent does not exceed 30% of the household's gross annual income.
213. This is an important assumption because it is possible that a household will be able to afford tenures that are deemed not affordable in this report if they are willing or able to dedicate a higher proportion of their income to housing costs. It is becoming increasingly necessary for households to do so. However, for the purpose of planning it is considered more appropriate to use this conservative lower benchmark for affordability on the understanding that additional households may be willing or able to access housing this way than to use a higher benchmark which assumes that all households can afford to do so when their individual circumstances may well prevent it.
214. The property website [Home.co.uk](https://www.home.co.uk) shows rental values for property in the area. The minimum reliable data is derived from properties available for rent within the GL7, GL54, GL55 and GL56 postcode areas, which covers a considerably larger area than the Plan area itself but can be used as a reasonable proxy for its geographical context. Moreover, because it forms a larger geography with a greater number of rental properties offered, the larger sample size is likely to generate more robust findings. There was an insufficient number of properties in the NA to provide reliable figures.
215. According to [home.co.uk](https://www.home.co.uk), there were 66 properties for rent at the time of search in November 2021 with an average monthly rent of £1,459. There were 26 two-bed properties listed, with an average price of £1,274 per calendar month.
216. The calculation for the private rent income threshold for entry-level (2 bedroom) dwellings is as follows:
- Annual rent = £1,274 x 12 = £15,285;
 - Multiplied by 3.33 (so that no more than 30% of income is spent on rent) = income threshold of £50,949.
217. The calculation is repeated for the overall average to give an income threshold of £58,361.

A.3 Affordable Housing

218. There are a range of tenures that constitute the definition of Affordable Housing within the NPPF 2021: social rent and affordable rent, discounted market sales housing, and other affordable routes to home ownership. More recently, a new product called First Homes has been introduced in 2021. Each of the affordable housing tenures are considered below.

i) Social rent

219. Rents in socially rented properties reflect a formula based on property values and average earnings in each area, resulting in substantial discounts to market rents. As such, this tenure is suitable for the needs of those on the lowest incomes and is subject to strict eligibility criteria.
220. To determine social rent levels, data and statistical return from Homes England is used. This data is only available at the Local Authority level so must act as a proxy for Stow on the Wold and the Swells. This data provides information about rents and the size and type of stock owned and managed by private registered providers and is presented for the Cotswold District in the table below.
221. To determine the income needed, it is assumed that no more than 30% of income should be spent on rent. This is an assumption only for what might generally might make housing affordable or unaffordable – it is unrelated to the eligibility criteria of Affordable Housing policy at Local Authority level. The overall average across all property sizes is taken forward as the income threshold for social rent.

Table A-1: Social rent levels (£)

Size	1 bed	2 beds	3 beds	4 beds	All
Average social rent per week	£86.33	£102.19	£114.44	£131.55	£104.71
Annual average	£4,489	£5,314	£5,951	£6,841	£5,445
Income needed	£14,949	£17,695	£19,816	£22,779	£18,132

Source: Homes England, AECOM Calculations

ii) Affordable rent

222. Affordable rent is controlled at no more than 80% of the local market rent. However, registered providers who own and manage affordable rented housing may also apply a cap to the rent to ensure that it is affordable to those on housing benefit (where under Universal Credit the total received in all benefits to working age households is £20,000).
223. Even an 80% discount on the market rent may not be sufficient to ensure that households can afford this tenure, particularly when they are dependent on benefits. Registered Providers in some areas have applied caps to larger properties where the higher rents would make them unaffordable to families under Universal Credit. This may mean that the rents are actually 50-60% of market levels rather than 80%.
224. Data on the most realistic local affordable rent costs is obtained from the same source as social rent levels for Cotswold District. Again it is assumed that no more than 30% of income should be spent on rent, and the overall average is taken forward.
225. Comparing this result with the average 2 bedroom annual private rent above indicates that affordable rents in the NA are actually closer to 45% of market rates, well below the maximum of 80%, a feature that is necessary to make them achievable to those in need.

Table A-2: Affordable rent levels (£)

Size	1 bed	2 beds	3 beds	4 beds	All
Average affordable rent per week	£108.40	£133.53	£154.80	£192.62	£135.09
Annual average	£5,637	£6,944	£8,050	£10,016	£7,025
Income needed	£18,771	£23,122	£26,805	£33,354	£23,392

Source: Homes England, AECOM Calculations

iii) Affordable home ownership

226. Affordable home ownership tenures include products for sale and rent provided at a cost above social rent, but below market levels. The three most widely available are discounted market housing (a subset of which is the new First Homes product), shared ownership, and rent to buy. These are considered in turn below.
227. In paragraph 65 of the NPPF 2021, the Government introduces a recommendation that “where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership.” The recently issued Ministerial Statement and updates to PPG state that 25% of all Affordable Housing should be First Homes – the Government’s new flagship discounted market sale product. When the NPPF is next updated, it is expected that the 10% affordable home ownership requirement referenced above may be replaced by the First Homes requirement.

First Homes

228. Whether to treat discounted market housing as affordable or not depends on whether discounting the asking price of new build homes of a size and type suitable to first time buyers would bring them within reach of people currently unable to buy market housing.
229. The starting point for these calculations is the estimated cost of new build entry-level homes in the NA, based on the cost of median house prices in the NA noted above of £375,000, and the assumption that the new build premium on an entry-level home would bring it close to the cost of an existing (not new) median property. This is within range of the median new build price across Cotswold district of £410,000.
230. For the minimum discount of 30% the purchase threshold can be calculated as follows:
- Median value of a home (NA average) = £375,000;
 - Discounted by 30% = £236,250;
 - Purchase deposit at 10% of value = £23,625;
 - Value of dwelling for mortgage purposes = £212,625;
 - Divided by loan to income ratio of 3.5 = purchase threshold of £60,750.
231. The income thresholds analysis in the Tenure and Affordability chapter also compares local incomes with the costs of a 40% and 50% discounted First

Home. This would require an income threshold of £52,071 and £43,393 respectively.

232. All of the income thresholds calculated here for First Homes are below the cap of £80,000 above which households are not eligible.
233. Note that discounted market sale homes may be unviable to develop if the discounted price is close to (or below) build costs. Build costs vary across the country but as an illustration, the build cost for a 2 bedroom home (assuming 70 sq m and a build cost of £1,500 per sq m) would be around £105,000. This cost excludes any land value or developer profit. This would not appear to be an issue in Stow on the Wold and the Swells.

Shared ownership

234. Shared ownership involves the purchaser buying an initial share in a property, typically of between 25% and 75% (but now set at a minimum of 10%), and paying rent on the share retained by the provider. Shared ownership is flexible in two respects, in the share which can be purchased and in the rental payable on the share retained by the provider. Both of these are variable. The share owned by the occupant can be increased over time through a process known as 'staircasing'.
235. In exceptional circumstances (for example, as a result of financial difficulties, and where the alternative is repossession), and at the discretion of the provider, shared owners may staircase down, thereby reducing the share they own. Shared equity is available to first-time buyers, people who have owned a home previously and council and housing association tenants with a good credit rating whose annual household income does not exceed £80,000.
236. To determine the affordability of shared ownership, calculations are again based on the estimated costs of new build entry-level housing as discussed above. The deposit available to the prospective purchaser is assumed to be 10% of the value of the dwelling, and the standard loan to income ratio of 3.5 is used to calculate the income required to obtain a mortgage. The rental component is estimated at 2.5% of the value of the remaining (unsold) portion of the price. The income required to cover the rental component of the dwelling is based on the assumption that a household spends no more than 30% of the income on rent (as for the income threshold for the private rental sector).
237. The affordability threshold for a 25% equity share is calculated as follows:
- A 25% equity share of £375,000 is £93,750;
 - A 10% deposit of £9,375 is deducted, leaving a mortgage value of £84,375;
 - This is divided by the loan to value ratio of 3.5 to give a purchase threshold of £24,107;
 - Rent is charged on the remaining 75% shared ownership equity, i.e. the unsold value of £281,250;

- The estimated annual rent at 2.5% of the unsold value is £7,031;
- This requires an income of £23,438 (annual rent multiplied by 3.33 so that no more than 30% of income is spent on rent).
- The total income required is £47,545 (£24,107 plus £23,438).

238. The same calculation is repeated for equity shares of 10% and 50% producing affordability thresholds of £37,768 and £63,839 respectively.
239. The thresholds for 10%, 25% and 50% shared ownership are all below the £80,000 income threshold. Although, 75% shared ownership is slightly above, however, it is therefore not recommended anywhere as a product in this report.

Rent to buy

240. Rent to buy is a relatively new and less common tenure, which through subsidy allows the occupant to save a portion of their rent, which is intended to be used to build up a deposit to eventually purchase the home. It is therefore estimated to cost the same as private rents – the difference being that the occupant builds up savings with a portion of the rent.

Help to Buy (Equity Loan)

241. The Help to Buy Equity Loan is not an affordable housing tenure but allows households to afford market housing through a loan provided by the government. With a Help to Buy Equity Loan the government lends up to 20% (40% in London) of the cost of a newly built home. The household must pay a deposit of 5% or more and arrange a mortgage of 25% or more to make up the rest. Buyers are not charged interest on the 20% loan for the first five years of owning the home.
242. It is important to note that this product widens access to market housing but does not provide an affordable home in perpetuity.

Appendix B : Housing Needs Assessment Glossary

Adoption

This refers to the final confirmation of a local plan by a local planning authority.

Affordability

The terms 'affordability' and 'affordable housing' have different meanings. 'Affordability' is a measure of whether housing may be afforded by certain groups of households. 'Affordable housing' refers to particular products outside the main housing market.

Affordability Ratio

Assessing affordability involves comparing housing costs against the ability to pay. The ratio between lower quartile house prices and the lower quartile income or earnings can be used to assess the relative affordability of housing. The Ministry for Housing, Community and Local Governments publishes quarterly the ratio of lower quartile house price to lower quartile earnings by local authority (LQAR) as well as median house price to median earnings by local authority (MAR) e.g. income = £25,000, house price = £200,000. House price: income ratio = £200,000/£25,000 = 8, (the house price is 8 times income).

Affordable Housing (NPPF Definition)

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

c) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Affordable rented housing

Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). The national rent regime is the regime under which the social rents of tenants of social housing are set, with particular reference to the Guide to Social Rent Reforms (March 2001) and the Rent Influencing Regime Guidance (October 2001). Local market rents are calculated using the Royal Institution for Chartered Surveyors (RICS) approved valuation methods¹⁷.

Age-Restricted General Market Housing

A type of housing which is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.

Annual Monitoring Report

A report submitted to the Government by local planning authorities assessing progress with and the effectiveness of a Local Development Framework.

Basic Conditions

The Basic Conditions are the legal tests that are considered at the examination stage of neighbourhood development plans. They need to be met before a plan can progress to referendum.

Backlog need

The backlog need constitutes those households who are eligible for Affordable Housing, on account of homelessness, over-crowding, concealment or affordability, but who are yet to be offered a home suited to their needs.

Bedroom Standard¹⁸

The bedroom standard is a measure of occupancy (whether a property is overcrowded or under-occupied, based on the number of bedrooms in a property and the type of household in residence). The Census overcrowding data is based on occupancy rating (overcrowding by number of rooms not including bathrooms and hallways). This tends to produce higher levels of overcrowding/ under occupation. A detailed definition of the standard is given in the Glossary of the EHS Household Report.

Co-living

Co-living denotes people who do not have family ties sharing either a self-contained dwelling (i.e., a 'house share') or new development akin to student housing in which people have a bedroom and bathroom to themselves, but share living and kitchen space with others. In co-living schemes each individual represents a separate 'household'.

¹⁷ The Tenant Services Authority has issued an explanatory note on these methods at <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1918430.pdf>

¹⁸ See <https://www.gov.uk/government/statistics/english-housing-survey-2011-to-2012-household-report>

Community Led Housing/Community Land Trusts

Housing development, provision and management that is led by the community is very often driven by a need to secure affordable housing for local people in the belief that housing that comes through the planning system may be neither the right tenure or price-point to be attractive or affordable to local people. The principle forms of community-led models include cooperatives, co-housing communities, self-help housing, community self-build housing, collective custom-build housing, and community land trusts. By bringing forward development which is owned by the community, the community is able to set rents and/or mortgage payments at a rate that it feels is appropriate. The Government has a range of support programmes for people interested in bringing forward community led housing.

Community Right to Build Order¹⁹

A community right to build order is a special kind of neighbourhood development order, granting planning permission for small community development schemes, such as housing or new community facilities. Local community organisations that meet certain requirements or parish/town councils are able to prepare community right to build orders.

Concealed Families (Census definition)²⁰

The 2011 Census defined a concealed family as one with young adults living with a partner and/or child/children in the same household as their parents, older couples living with an adult child and their family or unrelated families sharing a household. A single person cannot be a concealed family; therefore one elderly parent living with their adult child and family or an adult child returning to the parental home is not a concealed family; the latter are reported in an ONS analysis on increasing numbers of young adults living with parents.

Equity Loans/Shared Equity

An equity loan which acts as a second charge on a property. For example, a household buys a £200,000 property with a 10% equity loan (£20,000). They pay a small amount for the loan and when the property is sold e.g. for £250,000 the lender receives 10% of the sale cost (£25,000). Some equity loans were available for the purchase of existing stock. The current scheme is to assist people to buy new build.

Extra Care Housing or Housing-With-Care

Housing which usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are included in retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

¹⁹ See <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

²⁰ See http://webarchive.nationalarchives.gov.uk/20160107160832/http://www.ons.gov.uk/ons/dcp171776_350282.pdf

Fair Share

'Fair share' is an approach to determining housing need within a given geographical area based on a proportional split according to the size of the area, the number of homes in it, or its population.

First Homes

The Government has recently confirmed the introduction of First Homes as a new form of discounted market housing which will provide a discount of at least 30% on the price of new homes. These homes are available to first time buyers as a priority, but other households will be eligible depending on agreed criteria. New developments will be required to provide 25% of Affordable Housing as First Homes. A more detailed explanation of First Homes and its implications is provided in the main body of the HNA.

Habitable Rooms

The number of habitable rooms in a home is the total number of rooms, excluding bathrooms, toilets and halls.

Household Reference Person (HRP)

The concept of a Household Reference Person (HRP) was introduced in the 2001 Census (in common with other government surveys in 2001/2) to replace the traditional concept of the head of the household. HRPs provide an individual person within a household to act as a reference point for producing further derived statistics and for characterising a whole household according to characteristics of the chosen reference person.

Housing Market Area

A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap.

The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.

Housing Needs

There is no official definition of housing need in either the National Planning Policy Framework or the National Planning Practice Guidance. Clearly, individuals have their own housing needs. The process of understanding housing needs at a population scale is undertaken via the preparation of a Strategic Housing Market Assessment (see below).

Housing Needs Assessment

A Housing Needs Assessment (HNA) is an assessment of housing needs at the Neighbourhood Area level.

Housing Products

Housing products simply refers to different types of housing as they are produced by developers of various kinds (including councils and housing associations). Housing products usually refers to specific tenures and types of new build housing.

Housing Size (Census Definition)

Housing size can be referred to either in terms of the number of bedrooms in a home (a bedroom is defined as any room that was intended to be used as a bedroom when the property was built, any rooms permanently converted for use as bedrooms); or in terms of the number of rooms, excluding bathrooms, toilets halls or landings, or rooms that can only be used for storage. All other rooms, for example, kitchens, living rooms, bedrooms, utility rooms, studies and conservatories are counted. If two rooms have been converted into one they are counted as one room. Rooms shared between more than one household, for example a shared kitchen, are not counted.

Housing Type (Census Definition)

This refers to the type of accommodation used or available for use by an individual household (i.e. detached, semi-detached, terraced including end of terraced, and flats). Flats are broken down into those in a purpose-built block of flats, in parts of a converted or shared house, or in a commercial building.

Housing Tenure (Census Definition)

Tenure provides information about whether a household rents or owns the accommodation that it occupies and, if rented, combines this with information about the type of landlord who owns or manages the accommodation.

Income Threshold

Income thresholds are derived as a result of the annualisation of the monthly rental cost and then asserting this cost should not exceed 35% of annual household income.

Intercensal Period

This means the period between the last two Censuses, i.e. between years 2001 and 2011.

Intermediate Housing

92. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as 'low-cost market' housing, may not be considered as affordable housing for planning purposes.

Life Stage modelling

Life Stage modelling is forecasting need for dwellings of different sizes by the end of the Plan period on the basis of changes in the distribution of household types and key age brackets (life stages) within the NA. Given the shared behavioural patterns associated with these metrics, they provide a helpful way of understanding and predicting future community need. This data is not available at neighbourhood level so

LPA level data is employed on the basis of the NA falling within its defined Housing Market Area.

Life-time Homes

Dwellings constructed to make them more flexible, convenient adaptable and accessible than most 'normal' houses, usually according to the Lifetime Homes Standard, 16 design criteria that can be applied to new homes at minimal cost: <http://www.lifetimehomes.org.uk/>.

Life-time Neighbourhoods

Lifetime neighbourhoods extend the principles of Lifetime Homes into the wider neighbourhood to ensure the public realm is designed in such a way to be as inclusive as possible and designed to address the needs of older people, for example providing more greenery and more walkable, better connected places.

Local Development Order

An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Enterprise Partnership

A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local housing need (NPPF definition)

The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).

Local Planning Authority

The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the District Council, London Borough Council, County Council, Broads Authority, National Park Authority or the Greater London Authority, to the extent appropriate to their responsibilities.

Local Plan

This is the plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies form part of the Local Plan and are known as 'Development Plan Documents' (DPDs).

Lower Quartile

The bottom 25% value, i.e. of all the properties sold, 25% were cheaper than this value and 75% were more expensive. The lower quartile price is used as an entry level price and is the recommended level used to evaluate affordability; for example for first time buyers.

Lower Quartile Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Lower Quartile Household Incomes and Lower Quartile House Prices, and is a key indicator of affordability of market housing for people on relatively low incomes.

Market Housing

Market housing is housing which is built by developers (which may be private companies or housing associations, or Private Registered Providers), for the purposes of sale (or rent) on the open market.

Mean (Average)

The mean or the average is, mathematically, the sum of all values divided by the total number of values. This is the more commonly used “average” measure as it includes all values, unlike the median.

Median

The middle value, i.e. of all the properties sold, half were cheaper and half were more expensive. This is sometimes used instead of the mean average as it is not subject to skew by very large or very small statistical outliers.

Median Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Median Household Incomes and Median House Prices, and is a key indicator of affordability of market housing for people on middle-range incomes.

Mortgage Ratio

The mortgage ratio is the ratio of mortgage value to income which is typically deemed acceptable by banks. Approximately 75% of all mortgage lending ratios fell below 4 in recent years²¹, i.e. the total value of the mortgage was less than 4 times the annual income of the person who was granted the mortgage.

Neighbourhood Development Order (NDO)

An NDO will grant planning permission for a particular type of development in a particular area. This could be either a particular development, or a particular class of development (for example retail or housing). A number of types of development will be excluded from NDOs, however. These are minerals and waste development, types of development that, regardless of scale, always need Environmental Impact Assessment, and Nationally Significant Infrastructure Projects.

Neighbourhood plan

A plan prepared by a Parish or Town Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Older People

People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

²¹ See <https://www.which.co.uk/news/2017/08/how-your-income-affects-your-mortgage-chances/>

Output Area/Lower Super Output Area/Middle Super Output Area

An output area is the lowest level of geography for publishing statistics, and is the core geography from which statistics for other geographies are built. Output areas were created for England and Wales from the 2001 Census data, by grouping a number of households and populations together so that each output area's population is roughly the same. 175,434 output areas were created from the 2001 Census data, each containing a minimum of 100 persons with an average of 300 persons. Lower Super Output Areas consist of higher geographies of between 1,000-1,500 persons (made up of a number of individual Output Areas) and Middle Super Output Areas are higher than this, containing between 5,000 and 7,200 people, and made up of individual Lower Layer Super Output Areas. Some statistics are only available down to Middle Layer Super Output Area level, meaning that they are not available for individual Output Areas or parishes.

Overcrowding

There is no single agreed definition of overcrowding, however, utilising the Government's bedroom standard, overcrowding is deemed to be in households where there is more than one person in the household per room (excluding kitchens, bathrooms, halls and storage areas). As such, a home with one bedroom and one living room and one kitchen would be deemed overcrowded if three adults were living there.

Planning Condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning Obligation

A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Purchase Threshold

Purchase thresholds are calculated by netting 10% off the entry house price to reflect purchase deposit. The resulting cost is divided by 4 to reflect the standard household income requirement to access mortgage products.

Proportionate and Robust Evidence

Proportionate and robust evidence is evidence which is deemed appropriate in scale, scope and depth for the purposes of neighbourhood planning, sufficient so as to meet the Basic Conditions, as well as robust enough to withstand legal challenge. It is referred to a number of times in the PPG and its definition and interpretation relies on the judgement of professionals such as Neighbourhood Plan Examiners.

Private Rented

The Census tenure private rented includes a range of different living situations in practice, such as private rented/ other including households living "rent free". Around 20% of the private rented sector are in this category, which will have included some benefit claimants whose housing benefit at the time was paid directly to their landlord. This could mean people whose rent is paid by their employer, including some people in the armed forces. Some housing association tenants may also have been counted

as living in the private rented sector because of confusion about what a housing association is.

Retirement Living or Sheltered Housing

Housing for older people which usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

Residential Care Homes and Nursing Homes

Housing for older people comprising of individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Rightsizing

Households who wish to move into a property that is a more appropriate size for their needs can be said to be rightsizing. This is often used to refer to older households who may be living in large family homes but whose children have left, and who intend to rightsize to a smaller dwelling. The popularity of this trend is debatable as ties to existing communities and the home itself may outweigh issues of space. Other factors, including wealth, health, status and family circumstance also need to be taken into consideration, and it should not be assumed that all older households in large dwellings wish to rightsize.

Rural Exception Sites

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable dwellings without grant funding.

Shared Ownership

Housing where a purchaser part buys and part rents from a housing association or local authority. Typical purchase share is between 25% and 75% (though this was lowered in 2021 to a minimum of 10%), and buyers are encouraged to buy the largest share they can afford. Generally applies to new build properties, but re-sales occasionally become available. There may be an opportunity to rent at intermediate rent level before purchasing a share in order to save/increase the deposit level

Sheltered Housing²²

Sheltered housing (also known as retirement housing) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are many different types of scheme, both to rent and to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3

²² See <http://www.housingcare.org/jargon-sheltered-housing.aspx>

bedroomed. Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on. Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed. Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will also usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden.

Strategic Housing Land Availability Assessment

A Strategic Housing Land Availability Assessment (SHLAA) is a document prepared by one or more local planning authorities to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the Plan period. SHLAAs are sometimes also called LAAs (Land Availability Assessments) or HELAAs (Housing and Economic Land Availability Assessments) so as to integrate the need to balance assessed housing and economic needs as described below.

Strategic Housing Market Assessment (NPPF Definition)

A Strategic Housing Market Assessment (SHMA) is a document prepared by one or more local planning authorities to assess their housing needs under the 2012 version of the NPPF, usually across administrative boundaries to encompass the whole housing market area. The NPPF makes clear that SHMAs should identify the scale and mix of housing and the range of tenures the local population is likely to need over the Plan period. Sometimes SHMAs are combined with Economic Development Needs Assessments to create documents known as HEDNAs (Housing and Economic Development Needs Assessments).

Specialist Housing for the Elderly

Specialist housing for the elderly, sometimes known as specialist accommodation for the elderly, encompasses a wide range of housing types specifically aimed at older people, which may often be restricted to those in certain older age groups (usually 55+ or 65+). This could include residential institutions, sometimes known as care homes, sheltered housing, extra care housing, retirement housing and a range of other potential types of housing which has been designed and built to serve the needs of older people, including often providing care or other additional services. This housing can be provided in a range of tenures (often on a rented or leasehold basis).

Social Rented Housing

Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008.). Guideline target rents for this tenure are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England.²³

²³ See

<http://www.communities.gov.uk/documents/planningandbuilding/doc/1980960.doc#Housing>

aecom.com

Representation to the Stow-on-the-Wold and the Swells



COTSWOLD
DISTRICT COUNCIL

Neighbourhood Plan Regulation 14 consultation

Please find below comments from **Cotswold District Council** (CDC) on the Stow-on-the-Wold and the Swells Neighbourhood Plan 2020-2031 (the Plan).

CDC acknowledges the work that has been put in by the authors of this Plan, and commends its structure and clarity.

The following comments, observations and suggested amendments have been written to try to identify either points which in officers' opinion may not meet the Basic Conditions against which the NDP will be assessed, or where the wording used may be open to interpretation during the development management process. While we have commented on the majority of policies, we hope these suggestions will enhance the policies and the plan.

Unfortunately, we have also raised some more fundamental concerns. We are concerned that the Plan does not have the full support of one of the two partner parishes, an issue we believe must be overcome before the Plan can proceed. We have also raised a number of concerns on Policy STOW7, which is clearly a central pillar of the Plan. While the comments below go into some detail, it is worth highlighting our principal concerns: that the Plan seeks to allocate a parcel of land which is but a part of a larger site - thus is not presented as developable in its own right; and, that the development will need to demonstrate exceptional circumstances, yet reasonable alternatives such as a smaller site or developing outside the AONB have not been formally considered.

As context, Cotswold District Council is committed to a partial update of its Local Plan, with an aim to adopt an updated Local Plan in 2024. Following an Issues and Options Consultation in early 2022, the focus of development will remain broadly consistent with our current strategy of directing development towards our 17 Principle Settlements. Reflecting the corporate ambitions of the Council, housing affordability and climate change considerations are likely to drive some other policy changes.

1.1. States that the plan is being jointly prepared by Stow Town Council and Swell Parish Council, yet we understand from Swell Parish Council they have concerns over the content and process. As they have not endorsed this draft plan, the introductory section is a little misleading in how it refers to their participation. We understand that advice from Stow's consultant and from Locality is that Stow is legally capable of presenting the NDP, as it is the Qualifying body for the Neighbourhood area. Assuming that is correct, Stow ought not to present the plan as fully supported by Swell if that is not the case.

Planning Policy guidance is clear that the consent of constituent parishes is required to undertake neighbourhood planning activity in a multi-parish area, and that gaining this consent is important if the pre-submission publicity and consultation and subsequently the submission to the local planning authority are to be valid (Paragraph: 027 Reference ID: 41-027-20140306). It is not explicit whether this consent, once given, can be withdrawn or altered, but we expect multi-parish plans to be carried out in partnership, and only progress beyond the key milestones with consent. Neighbourhood Planning practice has addressed some of the gaps in formal process, so that for example plans have been withdrawn post-examination, where the qualifying body no longer feels the plan as modified represents

their ambitions - i.e. neighbourhood plans are not imposed without support from the parish council. For all that Swell Parish is not the qualifying body, we are doubtful that the plan can proceed without the ongoing endorsement of the parish council responsible for the larger part of its neighbourhood area. It is therefore important that the two parishes meet after this consultation concludes, to take stock of responses and to see if they can agree a mutually acceptable approach to take forward the Neighbourhood Plan.

p5, Foreword A very minor point, but the phrase 'The process of consultation and inspection is likely to take until early 2023.' is not accurate, and will need revision for future drafts - furthermore, a neighbourhood plan is examined, not inspected.

p6, List of Policies We wonder whether referencing the policies as SSNP* or some alternative might be preferable to STOW*, given that some policies apply solely to Stow, have a specific Swell element, or apply to the area as a whole.

p7, Para 1.3. References the ambition of the Plan to set policies up to 2040, but the plan period is 2023-2031.

p8, para 1.5. The section on the Basic Conditions paraphrases these requirements. We would suggest the Basic Conditions are cited in full, if they are to be directly referenced - these are legal requirements, the precise meaning of which will be considered at examination. In other instances we have seen examiners suggest a similar modification.

p8. para 1.10 and 1.11. These paragraphs reference in error that the Plan was subject to SEA and HRA screening in early 2019. A draft screening report was prepared, but was not issued for consultation with the statutory bodies at this time, pending confirmation from Stow Town Council on the scale of its ambitions for the Neighbourhood Plan. The actual SEA and HRA Screening opinion was issued in October 2020, following consultation with the statutory consultees.

p.10 Provides a useful portrait of the town and demographic issues. As Census 2021 data is released, there is an opportunity to update a number of these statistics, which could serve to strengthen the points being made.

We are unclear why the plan only cites this particular list of policies, as policies such as biodiversity, Green Infrastructure etc are also relevant. There are, for example, local wildlife sites and areas of priority habitat within the two parishes.

p.11 Third bullet: Consider deleting the phrase 'frail' as not all residents will be. Fourth Bullet: consider better linking issues raised in bullet 3 with bullet 4. e.g. housing for those of working age to help address stated issues.

Para 3.6 It is inaccurate to say the dominant theme of the Local Plan in this part of the district, 'has been to see the town, villages and countryside remain much as they are and have been for many years'. This is a product of national policy and guidance that directs development to less sensitive areas in the district rather than an overriding objective to preserve in aspic.

Para 3.7 Consider reframing the last sentence, i.e. it provides a hook for the Neighbourhood Plan to respond directly to this matter.

Para 3.8 With regards to the statement ‘the council has advised...’ a more accurate account of correspondence would be to state that the Council’s latest version of the SHELAA identifies one site for further consideration for allocation. Please note submission of the Local Plan will now occur in 2024.

Para 3.10 The Gloucestershire Local Transport Plan is an important consideration in the preparation of development plans and neighbourhood plans and especially so given the plan’s intention to allocate major development.

Vision - The Council welcomes the Plan’s ambitious and well articulated vision and objectives for the future.

p20 Policy STOW1 The Stow on the Wold Development Boundary

The policy as currently drafted replicates Local Plan Policy DS2, which is unnecessary and should be avoided as per national policy.

All housing allocations within the Local Plan are placed within the development boundary. The proposed extent of development within site allocation STOW7 needs to be covered by the development boundary to meet the Basic Conditions. A recent and good example of this practice is the Fairford Neighbourhood Plan.

p20 Policy STOW2 Development in the Swells and the Countryside

This policy (at clause A) appears to introduce a new class of settlement “small village” which is not consistent with the strategic policies of the local plan (DS1). The Local Plan’s development strategy actively avoids listing non-principal settlements, such matters are considered on a case by case basis. This clause is not in general conformity with the Local Plan.

The second line of C seeks to disapply ss80(e) of the NPPF. NDPs have to have regard to the NPPF, but can differ, so this may be acceptable, but we’re not convinced that the mere assertion in the following paragraph is sufficient justification, given the robustness of the ss80 criteria, and the size and varied landscape of Swell Parish.

Clause C states, "In the Rural Area beyond the settlements of Lower Swell and Upper Swell proposals to improve the agricultural economy, equestrian facilities and local nature improvement will be supported." We think this would be better worded as "...proposals to improve the agricultural economy, equestrian facilities and to deliver nature recovery will be supported".

p21 Policy STOW3 Housing Mix

Achieving a housing mix to meet local needs is an aspiration we share for all development in the district. However, we wonder whether this policy represents an appropriate strategy to deliver that for the following reasons.

1. The very specific percentage requirements are not necessarily mathematically achievable - as illustration, the minimum development number of 6 does not strictly speaking break down in whole units against the percentages outlined in either part A or B. Thus, in order to achieve whole unit numbers, there will be process of rounding, and thus negotiation, which this policy does not specifically enable, but which is in reality the existing approach.
2. The housing mix in tenure and size on any development will need to reflect the viability of the development, in terms of the site, infrastructure requirements and the state of the housing market at the time. These variables are not immutable during the plan period, so whatever may be appropriate now may not be the best fit in future

years. A particular issue here would be the changing dynamic of need in Stow, particularly if a large development such as that proposed in policy STOW7 is built out.

3. Local Plan Policy H1 already says that, *"Developers should have regard to local evidence, for example, the latest SHMA and parish needs surveys, and show how the proposed mix of market housing provision will help to address identified local needs in terms of the size, type and tenure of housing."* Stow's housing needs survey can already be used to help determine the mix of houses in any planning application assessed against Policy H1.
4. The current NDP policy is not flexible to changing circumstances and the latest evidence.

All this said, local evidence, such as the Housing Assessment carried out by AECOM, and indeed any successor documents, should be a starting point for determining the housing mix. We would be supportive of a policy that states robustly that such evidence should direct the housing mix, and which presents the current summary information in the reasoned justification.

p22 Policy STOW4 Principal Residence

Second Home ownership, and other non-principal housing uses is often considered an issue within the neighbourhood area and the wider Cotswolds, which may affect housing availability and affordability for local people. Land use planning tools can be used to try to address this, but seem to be a rather blunt tool - with a policy such as this limited to new dwellings, when the main appetite for second homes will be for existing 'character' dwellings. There will still be the stock of (character) homes available for people to buy as second homes in Stow and the Swells. Therefore, will this policy be effective in preventing second home / holiday home ownership in the Neighbourhood Area?

There are also several national policy interventions underway that could go some way to resolving the issue in Stow without the proposed NDP policy. In January 2022 the [government introduced legislation](#) that will prevent owners of second homes from abusing a tax loophole by claiming their often-empty properties are holiday lets, thereby avoiding paying normal tax rates.

The Levelling-Up and Regeneration Bill also intends to introduce further restrictions:

- It is proposed that Councils will be granted powers to impose higher rates of council tax on empty and second homes (double the standard council tax rate on any home left empty for longer than a year, rather than two years as is currently the case).
- The government also proposed a new "tourist accommodation registration scheme" in England, through the [Tourism Recovery Plan](#).

The government also recently announced that second-home owners may face an Airbnb ban, which would aim to protect tenants living in tourist hotspots. Furthermore, it proposes to introduce a new planning use class for holiday homes, which would mean new holiday homes would require a change of use permission from conventional housing.

CDC is also seeking to address the issue by enabling the provision of short-term holiday let accommodation in suitable locations, such as Cotswold Water Park, to redirect the demand for this accommodation away from unsuitable locations and /or stressed locations.

The proposed policy approach has been supported in neighbourhood plans elsewhere in the country, subject to sufficient supporting evidence. However, the evidence justifying this policy is sparse. There should be far greater consideration of this matter (and its effects) in the SEA, given the role the Sustainability Appraisal played in the St Ives policy being upheld

in the face of legal challenge

(<https://stivesnplan.files.wordpress.com/2013/08/sustainability-appraisal-submission-version.pdf>, pp41-42, pp60-63).

The evidence quoted is taken from AECOM's Housing Needs Assessment, which we believe is the 2011 Census data on 'Household Spaces with no usual residents'. While often cited in this context, it should be noted this is not necessarily limited to non-principal dwelling uses. Our own Council Tax data, appended to this response at Annex A, may be useful, albeit it would be fair to acknowledge that not every second home owner will declare their property as such in their Council Tax return. Notably, it does not show a significant increase in Second Home ownership over recent years. While currently there is no formal threshold for when this approach might be acceptable, a similar level of second home ownership has not been deemed sufficiently high to justify the imposition of this type of restriction with another Neighbourhood Plan (Bridport), a judgement reached by the same examiner as St Ives. For this reason, we encourage you to review the more recent data which should be available from the 2021 Census shortly to evidence your proposal, and more fully illustrate why this is an issue in the neighbourhood area, to justify this policy constraint.

Stow is a Principal Settlement, and thus our strategy sees it having a role to play in meeting the district housing needs, which does include non-principal residency housing uses.

That said, CDC recognises that Stow is heavily constrained, to the extent that we have not allocated a site there within the current Local Plan - thus in the context of the district having sufficient housing supply, development, such as that proposed in STOW7, may only be considered to meet exceptional circumstances if it delivers growth on top of district needs, in order to meet housing demand arising from Stow. The principal residency policy could be considered to underpin this rationale, being a tool to enhance the benefit to the town. On this basis, we believe the policy may be judged to be in general conformity with the Local Plan.

We note that there are known difficulties with determining 'principal residency' and with enforcement action thereafter - this policy is likely to be most effective at the point of property sale. Moreover, there will be loopholes - e.g. someone can register the first home in their own name and the second home in the name of (e.g.) their partner. As a further observation, should the site proposed for allocation in STOW7 proceed as described, with the developer also seeking to deliver housing outside the boundary within Broadwell parish, this restriction would not apply to the houses that are functionally part of Stow, but are not within the parish/neighbourhood plan boundary. We could imagine this might influence how different sizes and tenures would be distributed around the site.

p22 Policy STOW5 Specialist Accommodation for Older People in Stow

The RJ suggests that the term 'small scale' used in the policy would be 5 homes or fewer. Given the range of different accommodation models referred to in the policy, we wonder whether this needs further exploration. Does the term 'home' refer to separate dwellings, so would not apply to a care home with more than 5 bedspaces? Is a limit of 5 dwellings on schemes incorporating an element of care realistic, given the costs of delivering care?

The policy uses the term 'genuinely affordable housing'. Affordable Housing is the defined planning term, which would add certainty to this policy. Adding the qualifier 'genuinely' suggests something different, that is not defined within the plan nor national policy, and thus may introduce doubt/subjectivity.

In a similar vein, the policy uses the term 'local connection'. The RJ does not state an intent to define this as such, but does include the phrase 'households relocating from within the Town or Parish or from a Parish that immediately adjoins the Neighbourhood Area' which might be read as such. We observe that such a definition would be more limited than the

definition of 'local connection' used by the district council, and which would be too restrictive if such affordable dwellings are managed through Gloucestershire Homeseeker Plus or any successor.

p23 Policy STOW6: Health and Wellbeing

We endorse the ambitions of this policy - it provides a clear message about healthy place-shaping to complement the design guidance.

Regarding the reference to major development, clarity is needed about whether this refers to the NPPF (2021) Annex definition or major development in the AONB referred to at NPPF (2021) para 177. For reference, the NPPF annex definition is "*For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more...*"

We would have expected this policy to make reference to Green Infrastructure since it mentions some of the components of GI - perhaps it could say that development should deliver GI that meets Building with Nature standards or the new Natural England principles and standards.

p24 Policy STOW7: Land North East of Stow

CDC recognises the importance of affordable housing in maintaining the vibrancy of Stow, and in defining Stow as a Principal Settlement, CDC supports the principle of new housing development within the settlement. However, the constraints in and around the town, most notably its hilltop location in the AONB, have dictated a Local Plan strategy that favours focussing strategic growth towards other settlements, particularly those that are not located within the AONB. The neighbourhood development plan may present an opportunity to address housing and other issues in Stow but we are concerned that there are various challenges that can be levelled at the current proposal.

- The SEA does not need to explore every possible option, but it does need to explore reasonable alternatives. NPPF (2021) para 177 specifies that "*great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs which have the highest status of protection in relation to these issues*" and that "*the scale and extent of development within these designated areas should be limited*". Furthermore, NPPF (2021) para 177 specifies that "*When considering applications for development within AONBs, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.... Consideration of such applications should include [amongst other things] an assessment of the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way*" (our emphasis).

We are not convinced by the current rationale in the SEA. We do not believe that sufficient consideration has been given assessing the scope for developing outside the designated area or meeting the need(s) in some other way. In particular, consideration should be given to whether Stow's affordable housing need can be / is already being accommodated outside the AONB. For example, Moreton-in-Marsh already has a 250-dwelling planning permission at Dunstall Farm, 67-dwellings under construction at Evenlode Road and other affordable housing developments. In addition, there is further potentially deliverable land elsewhere in the town that may be allocated in the partial update of the Local Plan. People living in Stow qualify as having a 'local connection' and can apply for an affordable home in Moreton. Furthermore, there are regular public transport connections between Moreton and Stow with a reasonable journey time.

Whilst this option does not deliver a community centre or a car park in Stow, it may be able to deliver Stow's affordable housing need without developing a highly sensitive major development site in the AONB.

Consideration should also be given a hybrid option whereby some of the affordable housing need could be delivered on sites that do not involve major development in the AONB combined with the remaining affordable housing need being met outside the AONB. The [Remainder of land at Tall Trees site at Oddington Road](#) may be one such location where the hybrid approach could be applied. This would have the advantage of delivering some affordable housing in Stow, albeit not the entire affordable housing need, with the remainder of the need being accommodated outside the AONB. This may provide another avenue for "meeting the need in some other way" without developing a highly sensitive major development site in the AONB.

- Is there sufficient evidence of housing need - that has to be delivered in Stow, to evidence the exceptional circumstances and public interest tests for major development? CDC is currently consulting on [guidance for major development in the AONB](#), which includes a proposed checklist to help users take consideration of the various issues that should be considered in the exceptional circumstances and public interest tests. This has been developed with the Cotswold National Landscape Board. Whilst this is still subject to further alteration, it would be beneficial for you to complete this.
- The Cotswold District Local Plan has been developed to meet the district's housing needs - is the need explored and enumerated in the AECOM housing report simply the Stow portion of this need, which our strategy is already addressing through allocations elsewhere in the district (in particular, recent development/permissions in Moreton-in-Marsh)? The Need Assessment is not supported by primary evidence, such as household surveys, but instead relies on modelling, using similar datasets to our district housing need. We note that GRCC's programme of work includes undertaking a Housing Need Assessment in Stow and its hinterlands towards the end of March 2023.
- Have you used the updated site assessments? We previously commented on the site assessments versions currently published on the town council website, as these are not wholly accurate - notably the assessment published for site 7 fails to mention the proximity of a nearby listed structure (Stow Well) and Scheduled Ancient Monument. We note these constraints are considered in the SEA.
- Assuming the argument for housing need can be upheld, the proposed development has a greater land take than a 'housing only' approach, through the inclusion of a community/business hub and a public car park. Is the argument for these aspects sufficiently robust so as not to undermine the proposal as a whole? Is the need for the community/business hub sufficient to justify major development in the AONB and does it outweigh the proposed level of harm? Is the need for either the public car park sufficient to justify major development in the AONB and does it outweigh the proposed level of harm? It is important to consider these aspects of the development separately to understand whether the level of harm can be mitigated by a smaller-scale development.
- The specification for the community hub (appendix C) envisages 6 x 25 sq m offices/retail units available for rent for periods of under one year. Both retail and office facilities are defined by the NPPF (2021) as Main Town Centre Uses. Supporting evidence would therefore be needed to demonstrate how this policy accords with Local Plan Policy EC8 and EC9, taking consideration of the proposed locations, which we assume to be out of centre given that the location would be near the car park to the north of the site (note the NPPF (2021) annex definitions of edge

of centre and out of centre). Would retail / office uses be viable in this location, which would be on the edge of the town? Would there be sufficient footfall to sustain retail in particular?

- The location of this community/business facility, on the periphery of the town, with adjacent parking, significantly risks generating short car journeys - within Stow, with residents opting for car transport to access the facility, and with tourists choosing to drive and park rather than incorporating a visit to the centre within a visit to the town centre.
- Would delivering additional parking support and possibly encourage the current reliance on the private motorcar? Is this consistent with the Plan's ambitions to tackle climate change and encourage zero-carbon ready housing. If additional housing enables more workers to live locally, and help sustain the town, then it would reduce the parking demand, not increase it. Transport emissions are a major component of our carbon footprint in Cotswold and Gloucestershire, and something that both CDC and Gloucestershire County Council are committed to reducing. On this point, we welcome the consideration given to electric car charging points, and note that building regs have recently been updated to require the provision of car chargepoints, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057375/AD_S.pdf
- Access from the car park and community centre to the rest of the town. The policy requires these facilities to be located close to the Broadwell junction. While we understand this location will avoid vehicle access through residential development, it also serves to put the facilities at the edge of the settlement. Given the local aspiration for a parking facility is driven by a desire to decant parking from the historic centre, is the access from this site to the town short enough, and attractive enough to achieve that objective? The site is circa 750 metres from the centre (using the library as the destination, contrasting with just under 450m for both the Shoppers' Car Park by Tesco and the Maugersbury Road Car Park, and unless access is achieved through Tesco, or routed down to Well Lane (increasing distance and inclines), requires a walk alongside the Fosseway for most of the route. Could the allocation make a play on creating an attractive feature walk into the town centre? A wildlife walk, boards explaining the history of the town, the landscape, etc, or something like that? Anything to make the route more attractive would encourage people to walk.
- The proposal which has been consulted upon is not limited to land within the neighbourhood area. While the NDP states that the viability of the policy is not subject to the whole site being developed, we are concerned about whether only a portion of a larger site can be considered a deliverable allocation, if it is not expected to come forward as a scheme in its right. The land area available for development within the plan area is surely contingent upon a defensible landscape barrier at the edge of the site, outside of the NDP boundary - i.e. a development only within the NDP would need to accommodate landscaping, which is not factored into the quantum of development the plan seeks to enable. . On this point, a variety of technical documents prepared on behalf of the scheme promoter have been published - on initial review, none of these explore the acceptability of a sub-scheme only within the neighbourhood area.
- In a similar vein, the shape of the allocation itself is an unusual 'L' shape, projecting into the countryside at the south eastern edge, and creating an unusual urban form that is determined by the administrative boundary rather than being 'landscape led'. The shape of the allocation would cause additional landscape harm and is rather at odds with the approach sought by the Cotswolds AONB, the Local Plan, and articulated in the SEA.

- As already discussed, the Local Plan strategy seeks to limit the scale and extent of development with the AONB and places great weight on conserving and enhancing its landscape and scenic beauty. However, if there is an exceptional circumstance for a major development in the AONB, and the development is in the public interest, the council would support such an approach. However, it would seem the full extent of the available land is needed (including the land within Broadwell parish) for it to have a chance of demonstrating the exceptional circumstances and public interest tests. If this is the case would it not be better to allocate the entirety of the site through an expanded neighbourhood plan area? This solution would have the benefit of making best use of available land and avoiding the landscape harm of the irregularly shaped site. As presented it is unlikely this site would secure the benefit of site allocation in the Local Plan, the justification is currently too weak to pass the test of soundness - a higher test than the general conformity test required of Neighbourhood Plans.
- The policy, the RJ and the building specification at pp 56-57 set out in some detail the scale of the car parking and the community building. However, the text does not specify the ownership model for either - while policy should rightly be focused on the land use, the ownership model is surely material to a view on whether the community benefit of these facilities outweighs the harm - will the town council own these assets, and accrue a financial return to manage them as set out in the policy, and to the benefit of the town, or will it be expected to pay rent on the space specified in the policy? Does the cost of these assets need to be recouped from the development and offset against other deliverables, or will the developer retain ownership?
- The policy specifies “for a low or zero carbon residential-led, mixed use development...”. If you include “low or”, you will never deliver zero carbon. We suggest having one or the other.
- The policy includes a 20% BNG requirement - is there a justification for that given the mandatory level is 10%? And where will it be delivered - within the Neighbourhood Area part of the development site? To what extent does this affect development viability and the deliverability of the plan and policy?
- Within part A of the policy, we would prefer wording such as “comprising 60% (approx. 100) open market homes and 40% (approx. 70) affordable homes”. Otherwise, there is ambiguity over the specific percentage that will be required. We note there is no part C to the policy. Please also avoid bullet points in policy, it makes it difficult to cite a policy criterion in reports..
- In part E, please replace ‘Cotswold Design Code’ with ‘the design policies of the Local Plan’. This will ensure the policy is flexible to any future changes to the Local Plan.
- Paragraph 5.26 specifies distances to the town centre and the superstore. Given the size of the site, there will be homes located much further away than these distances. To overcome this issue, we suggest instead providing a range including the closest point and the furthest point from the town centre and the superstore.
- Paragraph 5.27 states that, *“In this regard, the allocation proposal is considered to comprise a ‘major development’ in the AONB, the justification for which must show that its public benefits outweigh the harm to the AONB (as per NPPF §177 and set out in Appendix E)”*. To accurately reflect the NPPF (2021), the paragraph should read *“the justification for which must show that there must be exceptional circumstances for development and it can be demonstrated that the development is in the public interest”*.
- Paragraph 5.30 - please note, CDC is undertaking a partial update of its Local Plan. Part of the rationale is to accommodate increased housing needs and to maintain a five year housing land supply. It is expected that additional sites would be needed if

the district's current need of 533 homes a year up to 2031 is to be fully accommodated. This may be added to the reasoned justification of the policy.

- Paragraph 5.32 - *"new research has been commissioned but it is not considered that it will conclude anything other than capacity being an even greater problem."* We suggest deleting this as it predetermines the evidence.

p27 Policy STOW8: Stow Town Centre & Market Square

CDC welcomes the intent of this policy.

The policy reads as defining two areas, the 'Town Centre' and the 'Market Square'. However the Inset of the Policies Map on p38 only presents one area, outlined in pink, which may conceivably be the Town Centre, but which is labelled as the Market Square.

The policy refers to "buildings of local importance". These are not defined in the RJ, and please review the comment below on Policy STOW12.

Policy STOW10: Local Green Spaces

As a general point, CDC supports the identification of Local Green Spaces in Neighbourhood Plans. The sites proposed here, based on their description and distribution around the Plan area, appear to have been proposed based on their individual attributes in line with the guidance in the NPPF.

We note the importance of engaging with the site owners, as advised by the Planning Policy Guidance - as this is regularly something examiners have sought confirmation on. The sites are only shown on the wider maps of the area. It is crucial that detailed boundaries are clear, so we would strongly recommend site specific detailed scale maps are added. We encourage you to use the CDC LGS toolkit to fully evidence the LGS - it may be useful to do this where any sites may be challenged.

On a minor note, we'd suggest an alternative or additional site photograph for (5) Lower Swell Playing Field, as this photo does not really provide much insight into the nature of the site, rather simply depicting the access.

In terms of the final clause, for consistency with the Local Plan and clarity, we would suggest 'Development will only be permitted within a Local Green Space where there are very special circumstances, which outweigh the harm to the Local Green Space'. Logically, if development is permitted, it is not inappropriate, with the opposite also holding true, so the current phrasing perhaps underplays the strength of this policy in preserving important community assets,

p29 Policy STOW11: Stow and the Swells Design Code

The Design Code reads well, and reflects the different character areas of the Plan area sensitively and proportionately. The layout should assist with putting the Code into use. More specific comments are added as Annex B to this representation, below.

p30 Policy STOW12: Buildings of Local Importance

While the Local Plan already affords protection to non-designated local heritage assets, identifying these through neighbourhood plans provides useful granularity and certainty, and allows NDPs to celebrate local heritage, which we truly welcome. The policy proposed may not have sufficient regard to the NPPF as it makes no balance with the public benefit of any proposal.

For consistency with the terms used in the Local Plan and many other neighbourhood plans in the district, we invite SSNP to use the term ' Non-Designated Heritage Asset' (NDHA) instead.

Appendix B should include a map of each site to ensure that these can be mapped as part of CDC's systems and taken fully into account in the planning system. (Fairford NDHA work provides a useful example). Such an approach ensures that the full extent of the NDHA is considered. Currently, the sites are shown on the wider maps of the area but at quite a difficult scale to interpret onto the CDC mapping systems.

Photographs of the buildings identified in this policy are usefully supplied in the Plan, enabling some review. At p50, a photo of Newlands House is provided, but the photo is focused on the new development and not the historic building which is the reason for the citation. We would strongly encourage a different photograph.

p30 Policy STOW13: Zero Carbon Buildings

While we embrace the thinking behind this policy, we do not believe that it is reasonable that it applies to 'all development' (clause A) given the range of circumstances and scale of development that might require development consent.

It is not clear what "zero carbon ready" means. There are conflicts between this policy and the design code policy which would be better dealt with in the NDP itself than left for individual planning decisions.

Clause B will be very difficult to implement - how will any faults be rectified if the building is built? This places an additional resourcing burden on the Local Authority, how will this additional workload be delivered and funded? Are you able to provide examples of this policy criterion working in practice elsewhere?

Clause C appears to give some significant leeway on design to meet this criterion. As scripted it would apply in, and possibly be in conflict with the extensive Conservation areas.

p33 Policy STOW14: Walking & Cycling in the Town and Parish

We endorse the ambitions reflected in this policy. We note that a cycleway from Stow to Bourton-on-the Water would largely be outside the neighbourhood plan boundary. For the purpose of managing expectations, perhaps the words, 'To the extent the route lies within the neighbourhood area' or to similar effect should be added, and this ambition also picked up within section 6.4 as a community aspiration.

p33 Policy STOW15: Vehicle Parking

Transport emissions are a major component of our carbon footprint in Cotswold and Gloucestershire, and something that both CDC and Gloucestershire County Council are committed to reducing. On this point, we welcome the consideration given to electric car charging points - in locations such as Lower Swell, better parking facilities, enabling ULEVs perhaps even a shift away from private car ownership may be part of the solution.

p34 Policy STOW16: Digital Infrastructure

This is not consistent with national policy for designated heritage assets (eg NPPF para 202). Likewise it is not consistent with our AONB policy.

p35 Implementation

No specific comment, other to endorse the inclusion of this section.

p96--63 Appendix E

Please also refer to NPPF (2021) para 176, which specifies that “The scale and extent of development within AONBs should be limited”.

The level of harm of the major development proposal needs to be more comprehensively set out (see the Cotswold Conservation Boards’s major development checklists), which contain numerous different considerations. This is needed to show the level of harm resulting from the development proposal has been fully assessed and so it can be properly weighed against the benefits of the proposal in the planning balance. It would be useful to complete the CCB’s major development checklists as an evidence base document.

Point 3 should refer to “A multi-functional building of community facilities, retail and business workspace

Test A - regarding the ‘local person’ restriction, would this not be for anyone living in the District? The Local Plan, and policies presented above, would suggest so.

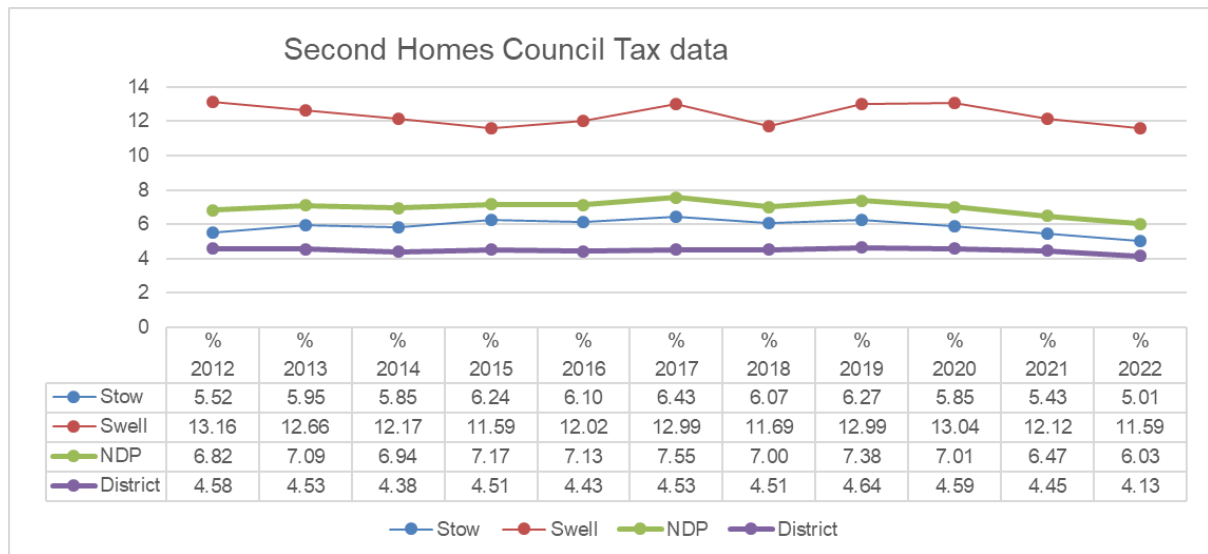
Typographical Errors

The following minor typographical errors have been identified.

p7, para 1.2 - first instance Cotswolds Area of Outstanding Natural Beauty

Joseph Walker, Community Partnerships Officer
Cotswold District Council
Trinity Road
Cirencester
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Annex A



A Second Home for tax purposes is a dwelling with is substantially furnished (enough to live in) but not considered to be the liable parties main residence. For example, properties that are owned by someone which are left unfurnished and not lived in, wouldn't be reflected in these numbers. This data has been gathered from Tax Base records, which is reported each year to allow the following years Council Tax charges. This is information collated from the system, which holds Council Tax records so is an official count.

Annex B Comments on the design code

We advise that the Cotswold Design Code will be up-dated and expanded in the review of the local plan (in line with the Council's 'green to the core' ambition, and the government's recent design code and guide guidance).

A number of the comments below will also apply to alter clauses that repeat the same type of wording but for other character areas.

The Stow design code is fairly architectural in focus and the references to Green Infrastructure (GI) are limited. There is no commentary on how the GI sections of the Cotswold Design Code should be considered in a Stow context. It also does not provide any guidance on how new sustainable technologies might best be installed in a way that retains the character of Stow, which is evidently a challenging operation particularly in the historic core of the town.

para 2.1 (and various coding clauses) We support the approach to divide the settlements into character areas, but the code also needs to be clear whether the design code also applies to developments in the more rural areas outside the character areas.

We have some concern that the preference for non-contemporary architecture in some character areas may be challenging when delivering net zero buildings.

D41A "CODING Roughcast or other rendering and lime washing are therefore not appropriate finishes for the Conservation Area." We are not convinced that completely avoiding the use of render is appropriate - maybe better to say that it should not usually be used. Limewash was much more commonly used in the Cotswolds in the past - "the white towns of the Cotswolds". We are not sure if this was the case in Stow, but might be worth further investigation.

D45A "CODING Roofs of Listed Buildings should be repaired and replaced with local Cotswold stone tiles, where that is the material used in the original building. There should be no replacement of original stone tiles with artificial stone tiles or blue slate. Blue slate is only acceptable on outbuildings and extensions to Listed Buildings on which it is already present. Roofs of modern buildings should be repaired or replaced with Cotswold Stone tiles."

It is very difficult in planning terms to "demand" local Cotswold stone although it is evidently preferable. We can usually only go on whether its appearance is acceptable regardless of origin. There may be instances where Welsh slate (or indeed artificial Cotswold stone tiles) are acceptable on modern buildings- to require any modern building with another roof covering to be replaced with Cotswold stone tiles is not proportionate (and often would not require planning permission anyway if residential).

D46A. Artificial stone and other more modern materials may be acceptable in some parts of the CA.

D50A. The use of muted colours has become more popular in recent years but in Victorian times strong colours were often used, for example on shop-fronts, therefore it may be difficult to justify this clause. See also D67A

D8B and D10B. The coding refers to the Conservation Area, but it is not quite clear what is meant by this clause. Does it mean that where these character areas are adjacent to the CA they should respect the character of the CA?

D22B and D25B. The coding clause is not very clear - it would benefit from being re-worded.

D34C "CODING However, the use of contemporary design and/or materials may be supported in an alteration or extension of an historic building where it is not visible and enables or supports improved sustainability and does not detract from the historical context of the building involved. The use of visible contemporary design and materials is not supported in historic buildings in this sub-area. For extensions or alterations to modern buildings or for new buildings, development proposals that include contemporary design features and materials which enable or support improved sustainability are encouraged as long as any visible technology does not detract from any adjacent historic building."

Contemporary extensions to historic buildings can be acceptable, particularly where they show a clear delineation between the modern and the historic. They would not necessarily have to be hidden from view. However a very high quality of design is required to deliver this.

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