



26 October 2023

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CABINET MEMBER FOR PLANNING AND REGULATORY SERVICES DECISION MEETING

A Cabinet Member for Planning and Regulatory Services Decision Meeting will be held at Council Chamber - Trinity Road on **Friday, 3 November 2023 at 2.00 pm.**

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 of interest by the Cabinet Member or Officers present.

2. **Neighbourhood Planning: Regulation 15 Decision For The Stow And The Swells Neighbourhood Development Plan (Pages 3 - 258)**

Purpose

To consider whether a Neighbourhood Plan submitted by Stow-on-the-Wold Town Council meets the legal criteria necessary to progress to public consultation, and subsequent independent examination.

Recommendations

1. That the Cabinet Member agrees that the submitted documents meet the requirement of Regulation 15 of the Neighbourhood Planning Regulations 2012;
2. Consequently, the Council will launch the statutory 'Regulation 16' publicity period for the standard six week period.

DATE OF DECISION: NO EARLIER THAN 3 NOVEMBER 2023

DEADLINE FOR COMMENTS: NOON ON 2 NOVEMBER 2023

Note: Any Member who wishes to comment on an item is requested to send those comments (preferably by e-mail) to the Reporting Officer, copied to Democratic Services, by the deadline identified.

(END)

Agenda Item 2



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET MEMBER FOR PLANNING AND REGULATORY SERVICES DECISION MEETING– 3 SEPTEMBER 2023
Subject	NEIGHBOURHOOD PLANNING: REGULATION 15 DECISION FOR THE STOW AND THE SWELLS NEIGHBOURHOOD DEVELOPMENT PLAN
Wards affected	Stow (directly), Fosseridge
Accountable member	Juliet Layton, Cabinet Member for Planning and Regulatory Services Email: juliet.layton@cotswold.gov.uk
Accountable officer	Charlie Jackson, Assistant Director, Planning and Sustainability Email: democratic@cotswold.gov.uk
Report author	Joseph Walker, Community Partnerships Officer Email: democratic@cotswold.gov.uk
Summary/Purpose	To consider whether a Neighbourhood Plan submitted by Stow-on-the-Wold Town Council meets the legal criteria necessary to progress to public consultation, and subsequent independent examination.
Annexes	Annex A Stow and the Swells Neighbourhood Plan A1: Stow and the Swells Neighbourhood Plan Regulation 16 Draft A2: Design Code Annex B: Basic Conditions Statement Annex C: Consultation Statement Annex D1 Strategic Environmental Assessment Annex D2 Habitat Regulations Assessment Screening
Recommendation(s)	<ol style="list-style-type: none">1. That the Cabinet Member agrees that the submitted documents meet the requirement of Regulation 15 of the Neighbourhood Planning Regulations 2012;2. Consequently, the Council will launch the statutory 'Regulation 16' publicity period for the standard six week period.

Corporate priorities	<ul style="list-style-type: none"> • Make our local plan green to the core • Providing good quality social rented homes • Support health and wellbeing
Key Decision	NO
Exempt	NO
Consultees/ Consultation	The Plan has been consulted on by the Town Council, and subsequent to this decision, will be subject to public consultation, following a statutory process. The Council will have the opportunity to make representations on the content of the Plan, for the consideration of an Independent Examiner.

1. EXECUTIVE SUMMARY

- 1.1** The purpose of this report is to consider whether a Neighbourhood Development Plan, submitted by Stow-on-the-Wold Town Council, meets the necessary conditions set out in the Neighbourhood Planning Regulations 2012 to proceed to the Regulation 16 publicity period and subsequently independent examination.

2. BACKGROUND

- 2.1** Stow-on-the-Wold Town Council (STC) first applied to this Council in 2012 to designate a neighbourhood area. The area applied for was the boundary of the parish. In 2015, STC and Swells Parish Council (SPC) applied for a new neighbourhood area, covering the entirety of the two parishes. They agreed that STC would act as the Qualifying Body, that is the body that qualifies to submit a neighbourhood plan for the designated neighbourhood area. Since that date, volunteers and councillors, and more recently, professional consultants have been working up the Plan, a process made more challenging by Covid 19 restrictions. Nevertheless, they carried out a statutory Regulation 14 consultation from February to March 2023. Representations to these consultations have been considered in preparing a submission draft, which has recently been received by this Council.

3. MAIN POINTS

- 3.1** At this stage, the Local Planning Authority (LPA) has a duty to assess the Plan for its compliance with the requirements of the Regulations and determine if it can proceed for Regulation 16 Consultation and Examination.
- 3.2** The assessment requires consideration of:
- whether the 'qualifying body' (a parish council or neighbourhood forum) is authorised to act;
 - whether the proposal and accompanying documents comply with rules of submission to the LPA, whether it meets the definition of a Neighbourhood Development Plan (NDP), and whether it meets the 'scope' of NDP provisions; and
 - whether the parish council or neighbourhood forum has undertaken the correct procedures in relation to consultation and publicity.
- 3.3** Should it be deemed that the above criteria have *not* been satisfied, and therefore the Plan *cannot* proceed for Regulation 16 Consultation and Examination, the LPA must refuse the Plan and notify the qualifying body of the reasons. In addition to this, it must also publicise its decision in a 'Decision Statement'.

- 3.4** Where the LPA is satisfied that the qualifying body has complied with the criteria, it must administer a 6 week period of consultation ('Regulation 16' consultation), inviting comment on the Neighbourhood Plan from statutory consultees and other stakeholders with an interest in the Plan. All comments are then submitted with the Neighbourhood Plan documentation to the independent examiner for assessment of whether or not the Plan meets the Basic Conditions (below) set out in the Regulations.
- 3.5** Following this consultation, the Plan will proceed to examination, and should it pass, subject to modifications, it would proceed to referendum and be 'made' (adopted) by this Council.
- 3.6** STC has submitted to Cotswold District Council a portfolio of documents, as required by the Neighbourhood Planning Regulations 2012. These evidence the other requirements which must be met (specified at section 2.2 above). The documentary evidence required and submitted is as follows:
- a map or statement identifying the area to which the plan relates,
 - the consultation statement,
 - the proposed NDP,
 - a statement explaining how the NDP meets the 'basic conditions' (the legal conditions that must be satisfied for an NDP to pass examination),
 - One of the following: a) a statement of reasons for a determination that the proposal is unlikely to have significant environmental effects OR b) an environmental report.
 - Where appropriate, the information to enable appropriate environmental assessments if required.

In this instance, A Strategic Environmental Assessment has been provided, along with a screening report to determine whether a Habitat Regulations Appropriate Assessment was required, which has been consulted upon with the statutory consultees, who upheld the Council's opinion that it was not.

4. CONCLUSIONS

- 4.1 These statutory requirements have been satisfied and therefore the officer recommendation is that the submission meets the criteria laid out in section 2.2 above, and should proceed to public consultation. The submission will be thoroughly reviewed, and any specific concerns will be brought to the attention of the Cabinet Member as part of a Council Representation to the Regulation 16 Consultation.

5. FINANCIAL IMPLICATIONS

- 5.1 The consultation is a statutorily defined process, with minimal costs, which is delivered using the current staff complement. The subsequent examination is paid for by the authority.
- 5.2 The cost of the examination is estimated to be up to £8,000. In the event that the examination fails these costs can increase, as the examination process tends to be more complex, but could be funded from non-ring fenced neighbourhood planning grant balances held from earlier successful examinations.

6. LEGAL IMPLICATIONS

- 6.1 As a published draft NDP, the Plan has some limited weight in planning determinations. This increases after consultation and after examination, and takes on full planning weight following a confirmatory vote at referendum.

7. RISK ASSESSMENT

- 7.1 This is a low risk decision, as the consequence of the decision is the launch of a consultation on a document prepared by a third party, which will subsequently be reviewed by an independent examiner.

8. EQUALITIES IMPACT

- 8.1 Not required for this decision.

9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 9.1 None for this decision, as it is procedural. Once the regulation 16 consultation starts, the Council has an opportunity to comment on the content of the attached draft plan.

10. ALTERNATIVE OPTIONS

10.1 None

11. BACKGROUND PAPERS

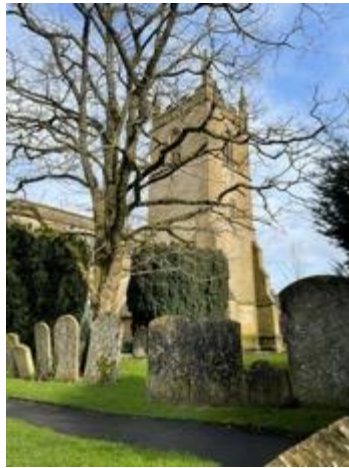
11.1 None

(END)

STOW ON THE WOLD & THE SWELLS

Neighbourhood *Plan*

2023 – 2031



NEIGHBOURHOOD PLAN

Published by Stow on the Wold Town Council for examination under the
Neighbourhood Planning (General) Regulations 2012 (as amended).

SEPTEMBER 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 its purpose.

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 summarises 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.

Appendices

This section contains important policy details and supporting information, as well as a summary of the evidence documents used to inform the plan.

STOW AND THE SWELLS NEIGHBOURHOOD PLAN 2023 - 2031

SEPTEMBER 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.

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

Swell Parish Councillors:

Councillor Diane Cresswell, Councillor Tom Blythe

Residents:

Mr Nicholas Carr, Mrs Ashleigh Cox, Mr David Cox, Mr Peter Dixon, Mr Stephen Gurmin, Mrs Bridget Ritacca, Mrs Merlyn Stracey (now a councillor), 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 (now a councillor), 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 Consultants, ONeill Homer Ltd, who have provided invaluable support and advice to NPSG, and AECOM who have carried out the Strategic Environmental Assessment of the plan.

This document is the last step along the way to final adoption of our Neighbourhood Plan that the Town Council controls. As the local planning authority, it is now for Cotswold District Council to arrange for the independent examination of our plan and the referendum.

Ben Eddolls
Chairman
Stow on the Wold Town Council

LIST OF POLICIES

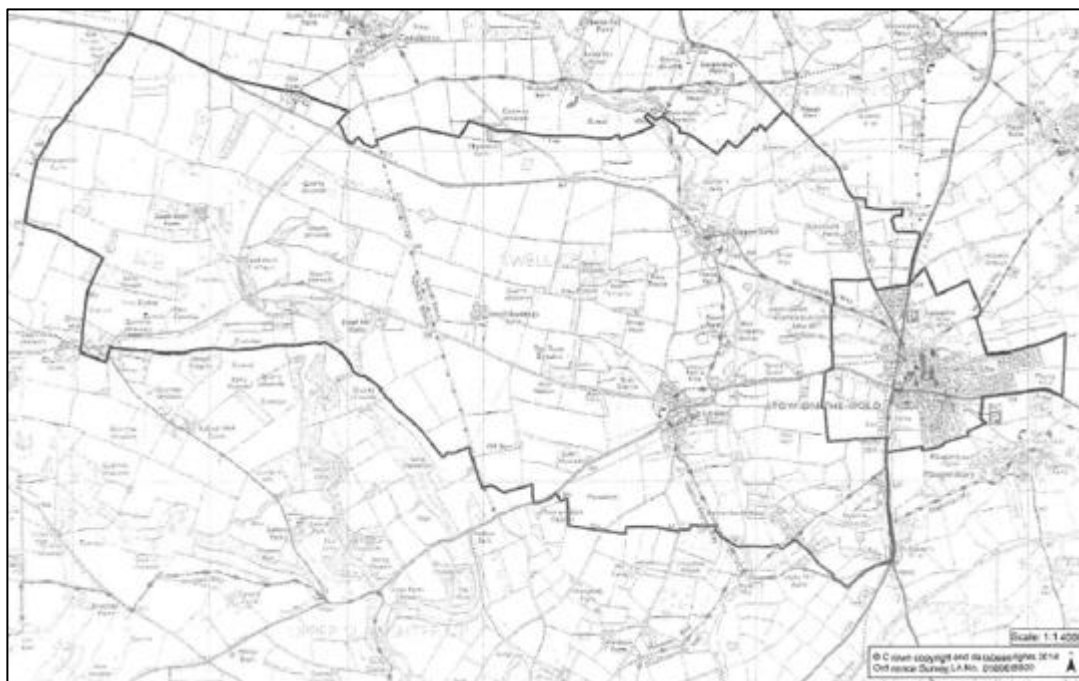
POLICY NO.	POLICY TITLE	PAGE NO.
SSNP1	The Stow on the Wold Development Boundary	22
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1. INTRODUCTION & BACKGROUND

1.1 Stow on the Wold Town Council and Swell Parish Council have jointly prepared a Neighbourhood Plan for the area designated by the local planning authority, Cotswold District Council (CDC) in April 2015. The plan was 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 Cotswolds 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 2031. The Plan forms 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'. The basic conditions are:

- having regard to national policies and advice contained in the guidance issued by the Secretary of State it is appropriate to make the plan.
- the making of the plan contributes to the achievement of sustainable development
- the making of the plan is in general conformity with the strategic policies contained in the development plan for the area
- the making of the plan does not breach, and is otherwise compatible with, EU-derived obligations
- prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the plan.

1.6 In addition, the council needs to demonstrate to an independent examiner that it has successfully engaged with its 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 Submission Plan

1.7 The Submission Plan embraces the core planning principle of the NPPF, namely to contribute to sustainable development with new housing and attendant infrastructure; to foster well-designed places with accessible services and open spaces; to protect and enhance our historic environment; and to improve biodiversity and tackle climate change.

1.8 It is the version of the plan that is subject to examination and then a referendum. It follows a formal consultation period on the 'Pre Submission' version of the plan in February – March 2023, during which the Town Council consulted on its proposed vision, objectives and policies of the Plan. It has reviewed the comments made by the local communities, the District and County Councils, other statutory bodies, land interests and other stakeholders. Some changes have been made as a result of their comments, which are summarised in the separate Consultation Statement.

The 2022 Levelling Up & Infrastructure Bill and 2021 Environment Act

1.9 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 maybe after the examination of this Neighbourhood Plan.

1.10 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 initiatives chime well with the expressed interests of the local communities.

Sustainability Appraisal & the Habitats Regulations

1.11 The District Council confirmed in its screening opinion of October 2020 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. An environmental (SA/SEA) report has been published separately alongside the plan in accordance with the regulations.

1.12 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.

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 Cotswolds 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 1,905 in Census 2021, a drop from 2,042 in 2011 and continuing a longer term trend since 2001 (see Figure 1 below). 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.

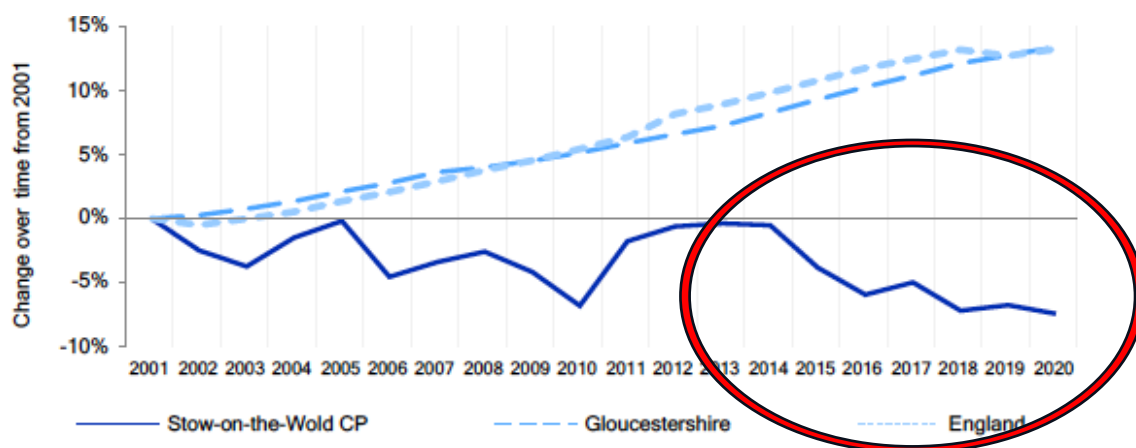


Figure 1: Population Change 2001 – 2020
(ONS via Local Insight Profile for Stow on the Wold CP, GCC)

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).

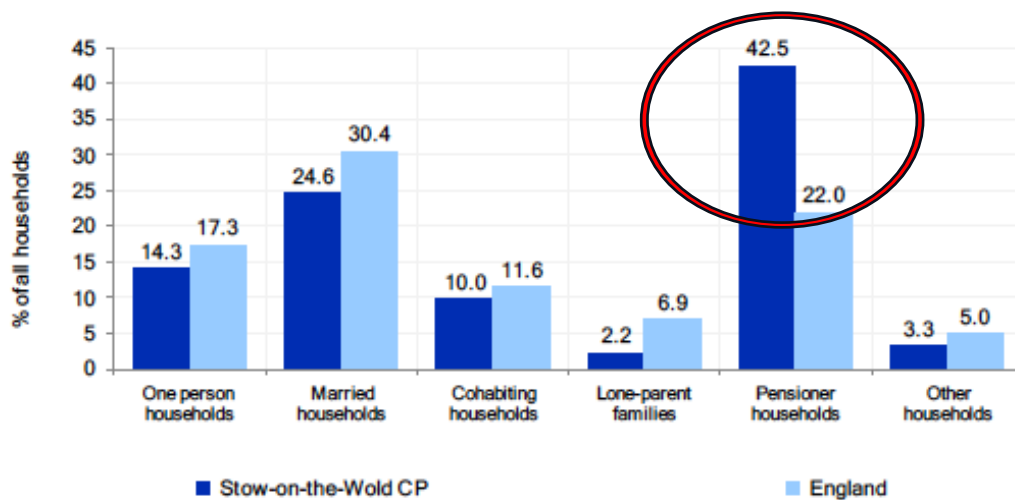


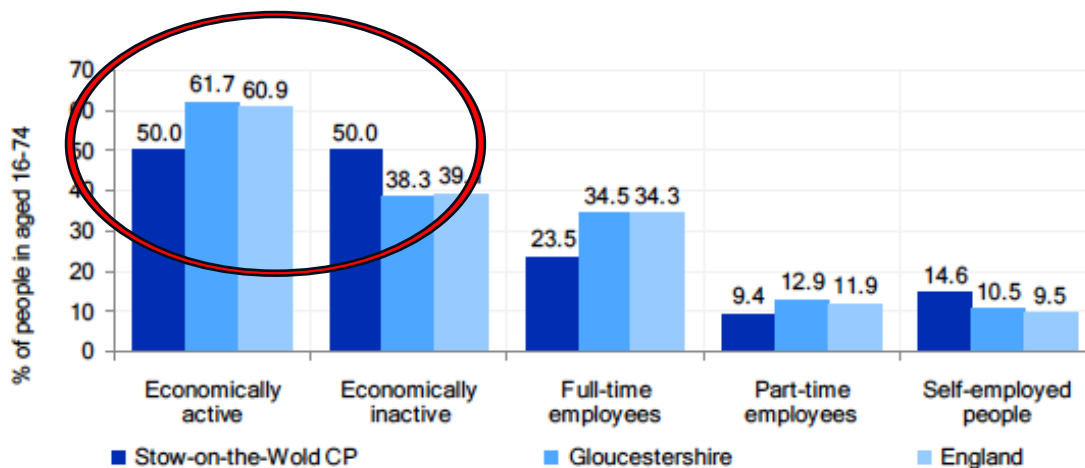
Figure 2: Household Types
(Census 2021 via Local Insight Profile for Stow on the Wold CP, GCC)

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.



*Figure 3: Economic Activity
(Census 2021 via Local Insight Profile for Stow on the Wold CP, GCC)*

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 amount of social housing was built in two major developments – 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 elderly residents to Stow's population (currently about 1900).
- There is a strong case for seeking to improve Stow's sustainability by providing a significant number of houses that local people, people of working age 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.

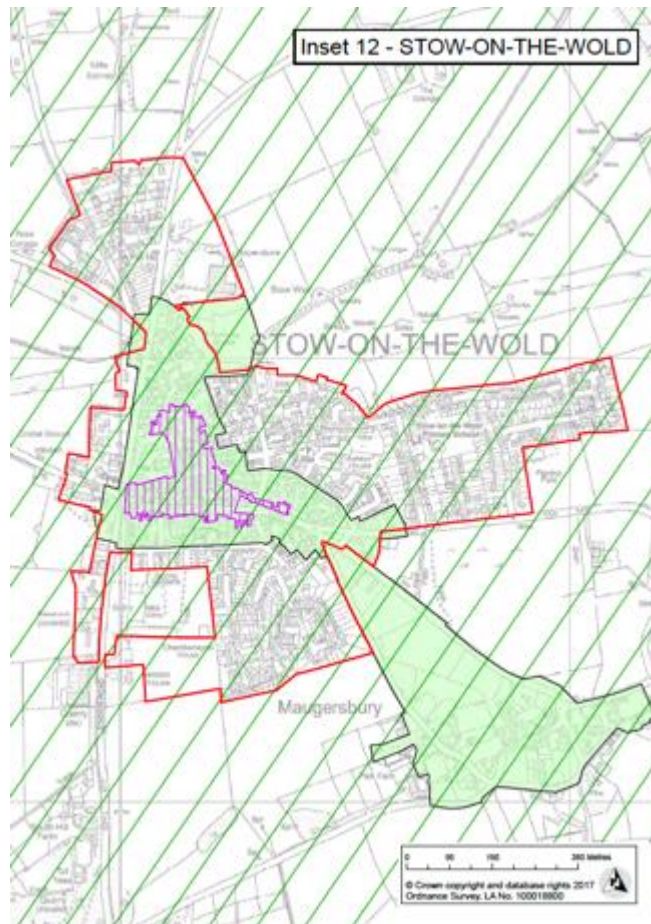
3.4 More recently, the Government published its first National Model Design Guide in autumn 2019 to encourage better design outcomes from the planning system. The Guide encourages local communities to engage in understanding the character of their areas and, where preparing neighbourhood plans, to prepare 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. Although the majority of its policies have some relevance to this Neighbourhood Plan, some are especially important:

- 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 and guidance shaping the Local Plan, a 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. It 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. This steer has been especially important in shaping the vision, objectives and policies of the Neighbourhood Plan.

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 later in 2023. The Neighbourhood Plan will therefore be examined in relation to the adopted Local Plan and not the emerging Local Plan.

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. Although it is not part of the development plan, the Gloucestershire Local Transport Plan has been considered in the preparation of this Plan as it is relevant for some of the issues that the Neighbourhood Plan seeks to address.

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' as , '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 on the website.

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. 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.

4.15 The Pre-Submission version of the plan was consulted on in early 2023 in line with the Regulations. The consultation generated significant interest in the town and the surrounding rural areas, most notably in respect of its main housing development proposal to the north east of the town. The comments highlight the differences of opinion on the future role and function of Stow but a large majority were submitted by residents of Broadwell village using a template letter. Most do not support the proposed vision, but this runs counter to the views expressed by Stow residents and businesses earlier in the project.

4.16 The exercise has served to make such views clearer, now neighbouring settlements have had the opportunity to engage with the project in a more formal way. But it has not led to new factors of technical substance coming to light that would warrant the deletion of that proposal from the submitted Plan.

4.17 More generally, the policies have been roundly supported by most or all parties, albeit with suggested improvements to some policies and their justification. Its green infrastructure, heritage, primary residence and zero carbon buildings policies have been especially well supported. It was therefore considered that the Plan can proceed to submission and examination with some modifications made to the text and maps to improve their meaning, to make corrections and to address omissions.

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 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 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 SSNP1: 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 policy DS2 of the adopted Local Plan for how proposals located within the Development Boundary of Stow on the Wold – a ‘Principal Settlement’ – will be managed, as distinct from proposals outside that boundary, which are addressed by Policy SSNP2. The Boundary shown on the Policies Map has been modified to reflect the completion of the surgery development on Mangersbury Road and the site allocation in Policy SSNP7 in accordance with Local Plan policy DS2.

5.7 The wording of policy DS2 is repeated so that Policy SSNP1 can operate independently of DS2 if the weight attributed to that policy is undermined by an out of date Local Plan or a failure by CDC to maintain a sufficient supply of housing land. 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 SSNP8 will be especially important in managing how well proposals fit with the very special character of the town.

Policy SSNP2: Development in The Swells and the Countryside

A. The Neighbourhood Plan identifies 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 identifies 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 to deliver nature recovery will be supported. Proposals for any 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. For clarity, the policy does not alter the ‘non-principal’ status of either settlement, nor sets any precedent for modifying or undermining the strategic intent or meaning of the Local Plan’s Development Strategy as set out in policy DS1. The purpose of the policy is to provide certainty for applicants and CDC in clarifying the types of development that are suitable in each settlement based on their settlement character.

5.9 The policy 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, which no level of architectural quality could redeem. It does not prevent proposals coming forward seeking to benefit from other clauses in NPPF §80.

Policy SSNP3: Housing Mix

A. Within the Stow on the Wold Development Boundary proposals for residential development schemes of 6 or more dwellings are required to deliver as part of the scheme at least 30% of the affordable dwellings (rounded as necessary) as First Homes to be made available at a minimum 50% discount. The mix of other affordable home tenures should have regard to the evidence in an up to date housing need assessment and should also be delivered within the scheme. Proposals that seek to maximise opportunities for new open market and affordable homes to be made available to persons with either a local connection to the Neighbourhood Area and its immediate surroundings or persons that are defined as key workers will be especially supported.

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 (which requires at least 40% of homes to be affordable), 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 and published separately in the evidence base. This report recommended that the Plan should increase the proportion of First Homes from the minimum 25% to 30% and should increase the sales discount rate from the minimum 30% to 50% to reflect the acute affordable housing problem of the town. Applicants should take into account that report and any later such evidence as circumstances may change during the plan period. Proposals with a number of dwellings that does not break down in whole units against the percentages specified in Clause A and B may need to adjust the percentages marginally. However, applicants should accommodate the percentages to the furthest extent possible.

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 SSNP7 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. The policy especially favours proposals that will make provision for key workers (as defined by CDC's adopted Affordable Housing SPD) and that can show they will appeal to, and be marketed at, local households as part of CDC's housing allocation process.

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 SSNP4, SSNP5 and the allocation of SSNP7 as a combined and sustained effort to bring about a more sustainable community.

Policy SSNP4: 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 has 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. The 2021 Census data is not yet available but is likely to show the same problem, combined with the increase in AirBnB-type listings (30-40 no. on average). With the allocation proposal of SSNP7 creating a generational opportunity to change the town's housing stock, and alongside the provisions of SSNP4 and SSNP5, its housing supply cannot be undermined by second home ownership.

Policy SSNP5: 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 affordable housing for households with a local connection; and**
- **they deliver no more than a total of 40 (C2) units and/or dwellings (C3) of this type over the plan period.**

5.18 The policy is intended to slow down the supply of age-restricted housing 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 national policy encourages planning for an increasing demand for such accommodation to meet the needs of an aging population, it does not take into account those places like Stow that already have an over-supply and where such an approach will only exacerbate the problem.

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. 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 SSNP3 and SSNP4 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 prophecy, 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 housing provision, 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 people who have a local connection, as defined by CDC. The policy therefore provides an exception for minor schemes – defined as 9 or fewer C2 units and/or C3 dwellings of this type (per the definition of minor development in national policy). However, it requires such proposals to be only almshouse-type schemes for elderly person households relocating from within the Town or Parish or from a Parish that immediately adjoins the Neighbourhood Area. And it caps the total number units and dwellings of this type that are provided to 40 over the plan period to avoid a higher number of incremental proposals whose cumulative effect may otherwise undermine the vision of the Neighbourhood Plan.

Policy SSNP6: 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
- deliver on site green infrastructure that meets Building with Nature standards and the principles set out in Natural England's Green Infrastructure Framework as relevant to the nature, scale and location of the proposal
- 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 as defined by NPPF §177, 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 SSNP7: Land North East of Stow

A. The Neighbourhood Plan allocates 10 Ha of land to the north east of the town, as shown on the Policies Map, for a low or zero carbon mixed use development scheme comprising:

- 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);
- A public car park scheme of approx. 150 spaces; and
- An enabling housing scheme of approx. 170 homes comprising approx. 100 open market homes (of which at least 5 plots should be provided as serviced plots for self-build or custom build homes) and approx. 70 affordable homes.

B. 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. The building form, its noise attenuation measures and its hours of operation should be

designed in a way that will protect the amenities of nearby residential properties but that will also enable the facility to be accessible and functional to meet a wider range of community needs during the daytime and evenings and on weekdays and weekends.

C. The public car park scheme shall be located within the site in a way that minimises the walking distance to the town centre and that fits well with the layout of the adjoining housing and community hub schemes. 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.

D. The enabling housing scheme shall comprise a mix of dwelling types as required by Policy SSNP3 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.

E. 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 Cotswolds AONB and with the relevant requirements of the Cotswold and Stow Design Codes. Its character and appearance should be inspired by the Parks Estate Character Area provisions in the Design Code. 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.

F. 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.

G. The transport strategy shall seek to discourage traffic generated by the housing, public car park and community hub schemes from travelling east on Broadwell Lane towards Broadwell village. 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.

H. 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.

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

1. an illustrative masterplan that defines the land uses and sets out the key development principles for access, layout and design;
2. a delivery plan setting out how the community hub and public car park schemes and supporting infrastructure will be secured and delivered, with the requirement that a planning obligation is agreed to require both schemes are delivered and available for

operation before the final occupation of the housing scheme (excluding the self-build element) at the latest;

- 3. design features that improve energy efficiency and reduce carbon dioxide emissions; and**
- 4. a proposal for how the scheme will manage any future identification of any part of the land as having heritage value as a battlefield site.**

5.25 This policy allocates 10 hectares of land on the north-eastern edge of Stow to deliver a new building to support community and business uses and additional public car parking, together with a housing scheme that will enable the delivery of both of those benefits. It is an essential component of delivering the vision for the future success of the town as a package of measures with policies SSNP3 and SSNP4 and a concept masterplan is shown in Plan D 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 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 part may also lie within land defined as having heritage interest on the periphery of the site of the Battle of Stow. New evidence to determine the full extent of the battlefield came to light during the consultation on the Plan but the matter remains uncertain (see the Heritage Assessment technical report in the evidence base for more information). This may be resolved by the time a planning application is made to deliver the allocation, for which purpose clause I(4) has been added to the policy. 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. The concept plan shown in Plan D is for illustrative purposes only at this stage; there may be different ways in which the scheme components and on-site mitigation measures can be planned and this will be done at the planning application stage. 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.



*Plan D: Land East of Fosse Way, Draft Indicative Layout
 (Source: Bloor Homes)*

5.30 The town has 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 evolved and 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 is seeking to relocate from its current inadequate facility in the town centre to the building, hence its provision for some office accommodation, and at this scale it is not considered to undermine the 'town centre first' principle. Similarly, it is possible that the hub may include a café facility, but this would be ancillary to the main uses of the building and not a separate, standalone facility. The Town Council will seek to 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.

5.31 The provision of a new public car park is another essential public benefit. It will enable the relocation of spaces out of the Market Square (see Policy SSNP8) 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. Its precise location will be proposed in the planning application but the policy requires that it balances securing the most convenient location to encourage walking to the town centre with accommodating its access from Broadwell Lane in a way that fits with the grain of the final scheme layout.

5.32 The housing scheme serves two purposes. Firstly, it makes the land available from its private owner for the community and car park schemes and the developer will fund the delivery of both schemes. There is no suitable public or other private land available for these purposes and no public funds to deliver them. Secondly, although the current Local Plan requires no new housing supply from the town for the plan period, it will make an important contribution to enabling the ever-aging demographic character of the town 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 SSNP3 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.

5.33 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.

5.34 The policy requires that any planning application that wishes to benefit from its support must be comprehensive in covering all of its elements and must set out precisely how and when the community and parking schemes will be delivered. This reflects the fact that the housing scheme must enable their timely delivery, leaving no prospect that it will be built out and occupied before they are secured and able to operate. This will be done through a planning obligation, which will also secure other elements of the policy, for example its affordable housing. The land interest has confirmed that this approach is reasonable and acceptable and that the project is small enough to be completed in one phase comprising all its elements. In which case, it is not considered neither necessary nor reasonable for the policy to require the delivery of those schemes any earlier than before the housing scheme is completed and occupied.

Policy SSNP8: 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 non-designated heritage assets.

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 Local Plan 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 SSNP7. This responds to the steer of Local Plan Policy S13 to improve the public realm of the Market Square. 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. The policy requires that number of spaces to be relocated strikes the balance between securing this benefit and maintaining sufficient spaces for visitors/customers of the Market Square shops and services.

Policy SSNP9: 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 SSNP10 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.

5.41 Proposals need to comply with recognised standards on dark skies including 'The Reduction of Obtrusive Light' guidance note published by the Institution of Lighting Professionals and the Dark Skies Technical Advice Note published by the South Downs National Park Authority.

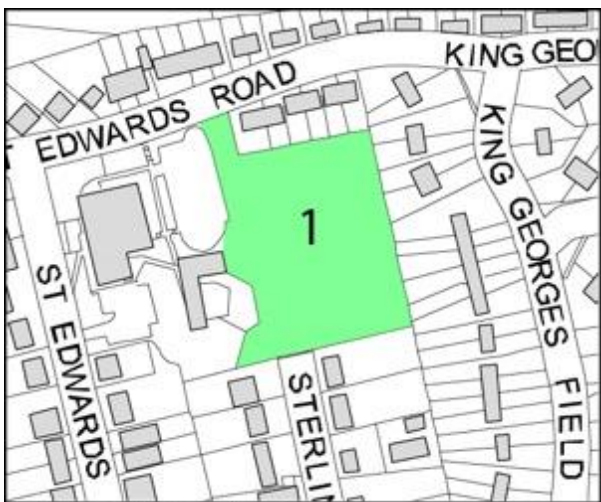
Policy SSNP10: Local Green Spaces

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

- 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**

Inappropriate development within a Local Green Space will only be supported in very special circumstances as defined by national policy.

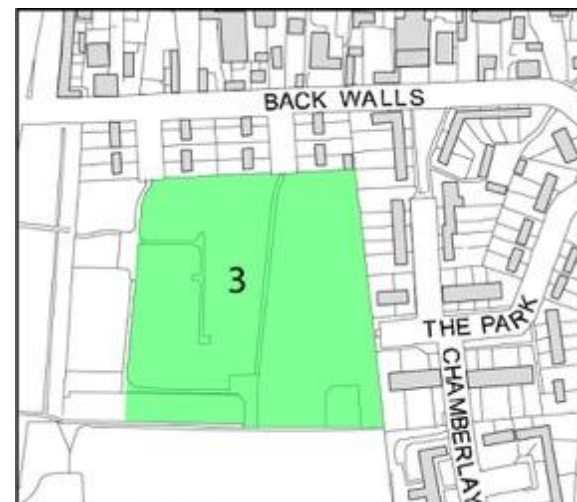
5.42 This policy designates nine Local Green Spaces to protect them from inappropriate development, the detailed maps of which are shown below. All of them are considered to meet the tests of NPPF §102 to show they are cherished by the local community (see Appendix A for further details). The effect 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. They are all owned by one or other public body.



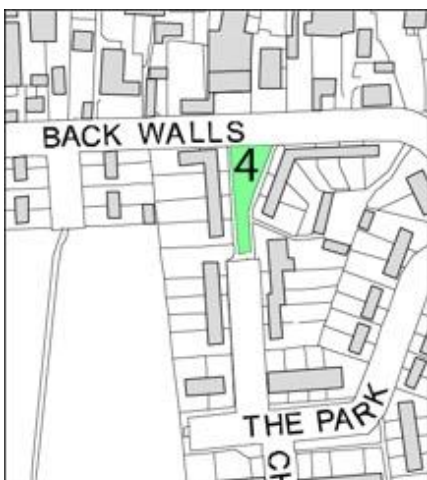
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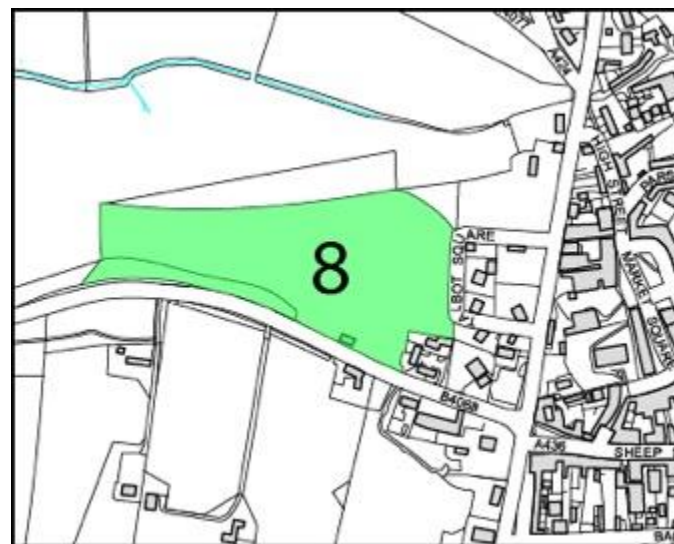
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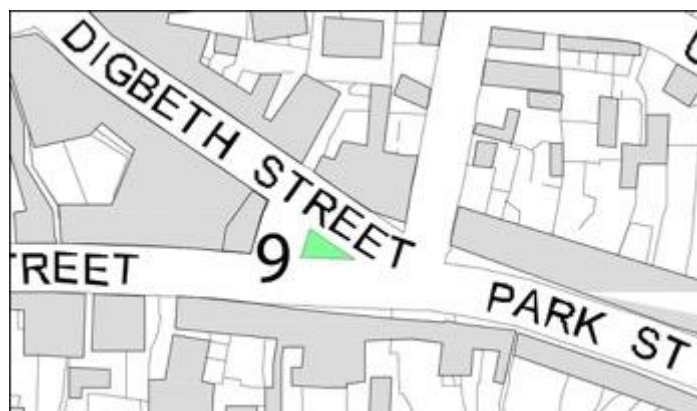
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Policy SSNP11: Stow and the Swells Design Code

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

5.43 This policy supplements the Cotswold Design Code (in Appendix D of the adopted Local Plan) with a Stow and the Swells 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.

5.44 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.

5.45 As with the Cotswold Design Code and the AONB Management Plan, the policy 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 in the area of how this has worked well in recent years.

Policy SSNP12: Non-designated Heritage Assets

Proposals that may affect a non-designated heritage asset (listed in Appendix B) should take into account the significance of its heritage value and must demonstrate how any harm to, or loss of, that significance is outweighed by its benefits.

5.46 This policy assists with the implementation of Local Plan Policy EN12 and §203 of the NPPF, both of which set out how proposals affecting non-designated heritage assets 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.

5.47 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.

5.48 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 SSNP13: Zero Carbon Buildings

A. Development proposals should be ‘zero carbon ready’ by design as relevant to their nature, scale and location so that they will minimise the amount of energy needed to heat and cool buildings by way of their 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.

5.49 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. Its focus is on delivering on the energy performance standards required of all new developments in the area to encourage and thereby on incentivising the use of the Passivhaus or equivalent standard of building design. Achieving this level of performance will make a significant contribution to mitigating climate change that the Neighbourhood Plan can deliver.

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 seeks to tackle a longstanding problem of constructed buildings not meeting the energy performance standard proposed by the builder, which only becomes obvious once the building is occupied. Without a check and balance in the approval system there is currently no means of correcting these failures that are resulting in higher energy bills for occupants and under-performance on meeting carbon reduction targets.

5.52 It therefore requires the developer of a consented housing development scheme of any size to ensure that they have made provision with future occupants to be able to enter properties after the first year of occupation, or thereabouts, to carry out a Post-Occupancy Evaluation (POE), including actual metered energy use, and to submit a report to the local planning authority. It will be implemented by attaching a planning condition to this effect, 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. Although it is accepted that this will increase the post-application resource of CDC, it has declared a climate emergency and this will be one of the most effective ways of this ambition being acted upon. Further guidance on the purpose and operation of clause B is contained in Appendix D of this document.

5.53 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. Passivhaus certified schemes are exempted from the POE provision of clause B as they cannot fail in that way. Until such standards can be required by planning policy it is hoped that this exemption will be an effective incentive, especially as the build costs of doing so are now only just above those of conventional buildings.

5.54 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.

5.55 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.

5.56 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.

5.57 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.

5.58 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 SSNP14: 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 to the extent the route lies within the Neighbourhood Area will be supported.

5.59 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.

5.60 With that in mind Policy SSNP7 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 cycle path to link the town with its neighbour Bourton on the Water to the south. The policy offers encouragement to this realising that goal to the extent that the route lies within the Neighbourhood Area. Strategic multi-modal connections would also be supported, such as provisions for cycle access to Kingham Rail Station and the National Cycle Network.

Policy SSNP15: 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.**

5.61 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.

5.62 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 SSNP16: Digital Communication Infrastructure

The public benefit of improving access to digital communication infrastructure in the area will be significant weight in the planning balance of proposals that may cause harm to designated heritage assets or to the special landscape and scenic beauty of the Area of Outstanding Natural Beauty. Proposals are required to be sensitively located and designed in order to avoid or minimise potential adverse effects on the natural beauty of the Cotswolds National Landscape, including its landscape and scenic beauty.

5.63 This policy seeks to encourage the provision of new digital communications infrastructure that will drive technological advancements necessary to support new businesses and homes. This infrastructure includes the installation of new transmitters, antennas, junction boxes and satellite dishes. 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 significant weight is attached to the public benefit of having access to this infrastructure when weighed against any harm to heritage and landscape in the planning balance of each proposal.

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.

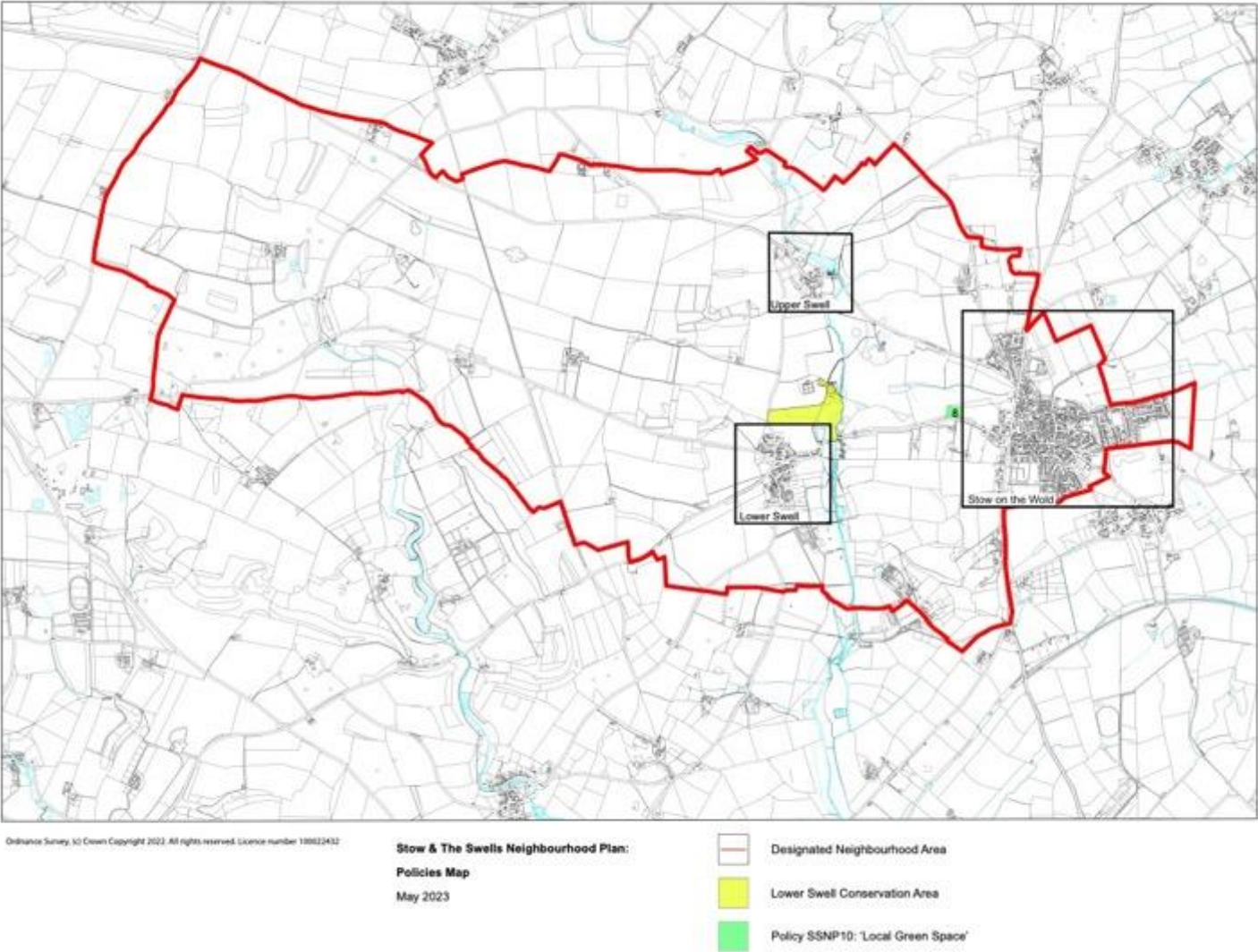
Local Infrastructure Improvements

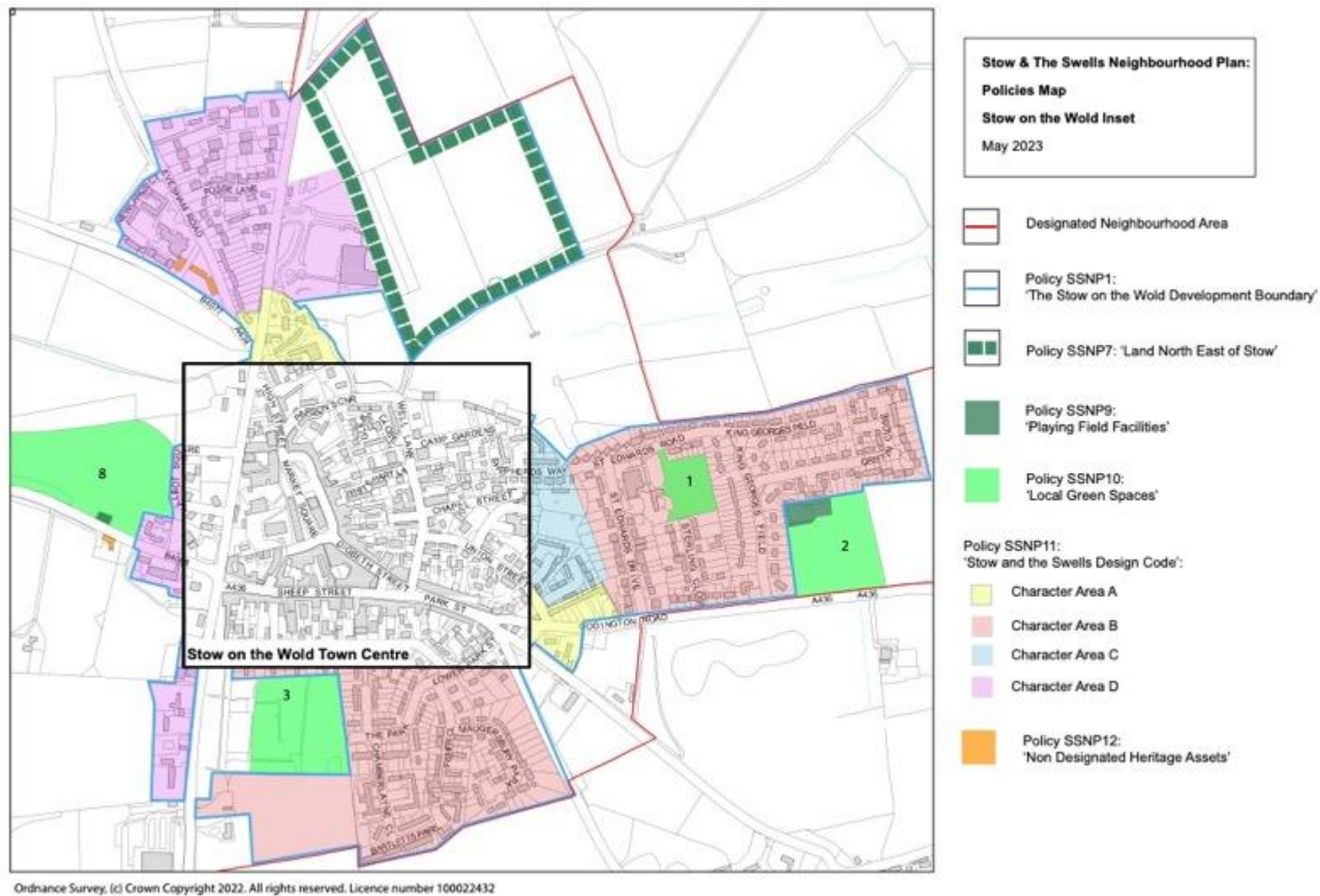
6.3 Where opportunities arise through the Community Infrastructure Levy and S106 obligations to secure financial contributions to invest in improving local infrastructure, the Town Council proposes that the priorities for investment are Market Square public realm improvement and the Community Hub.

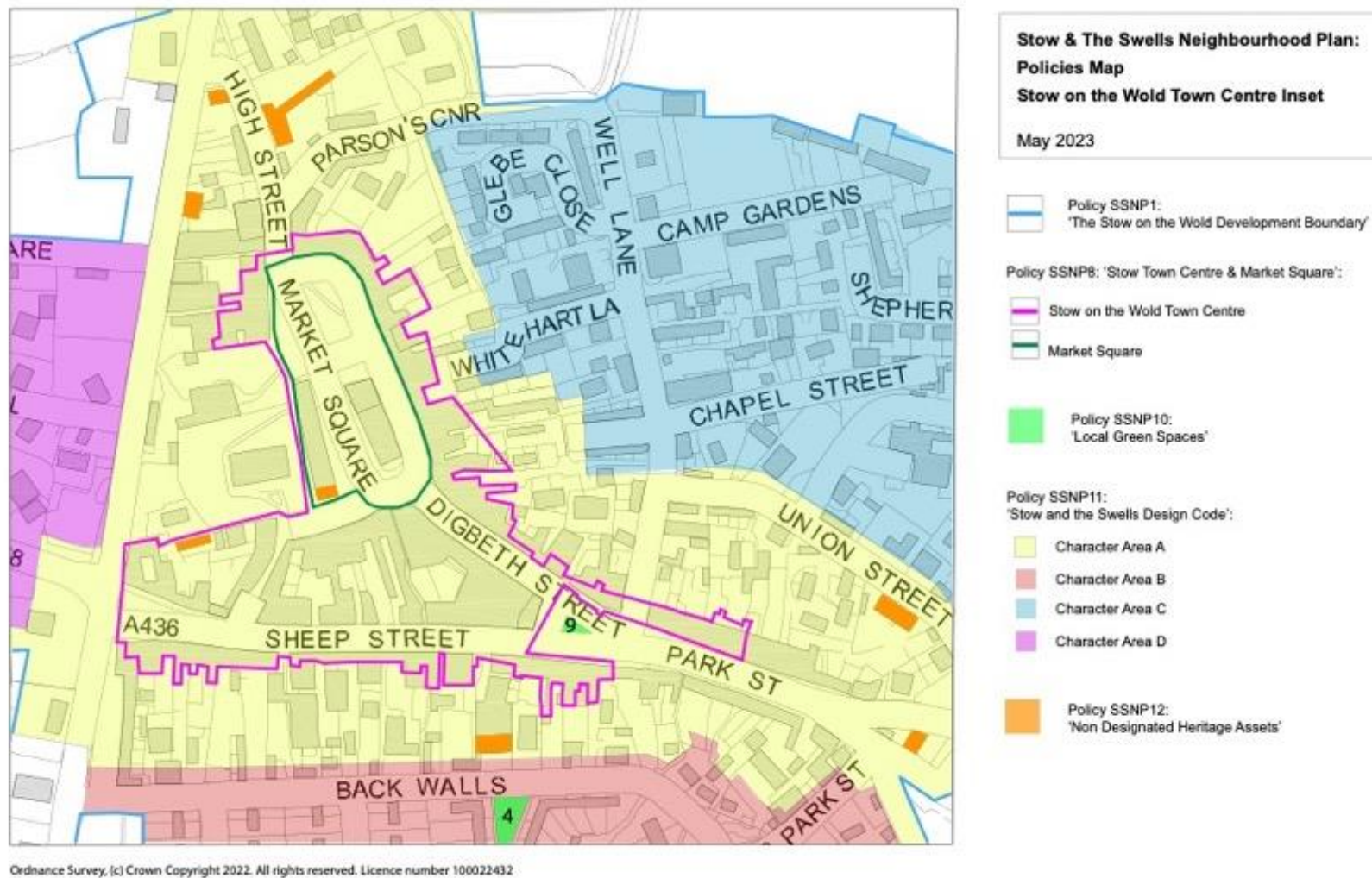
Other Non-Planning Matters

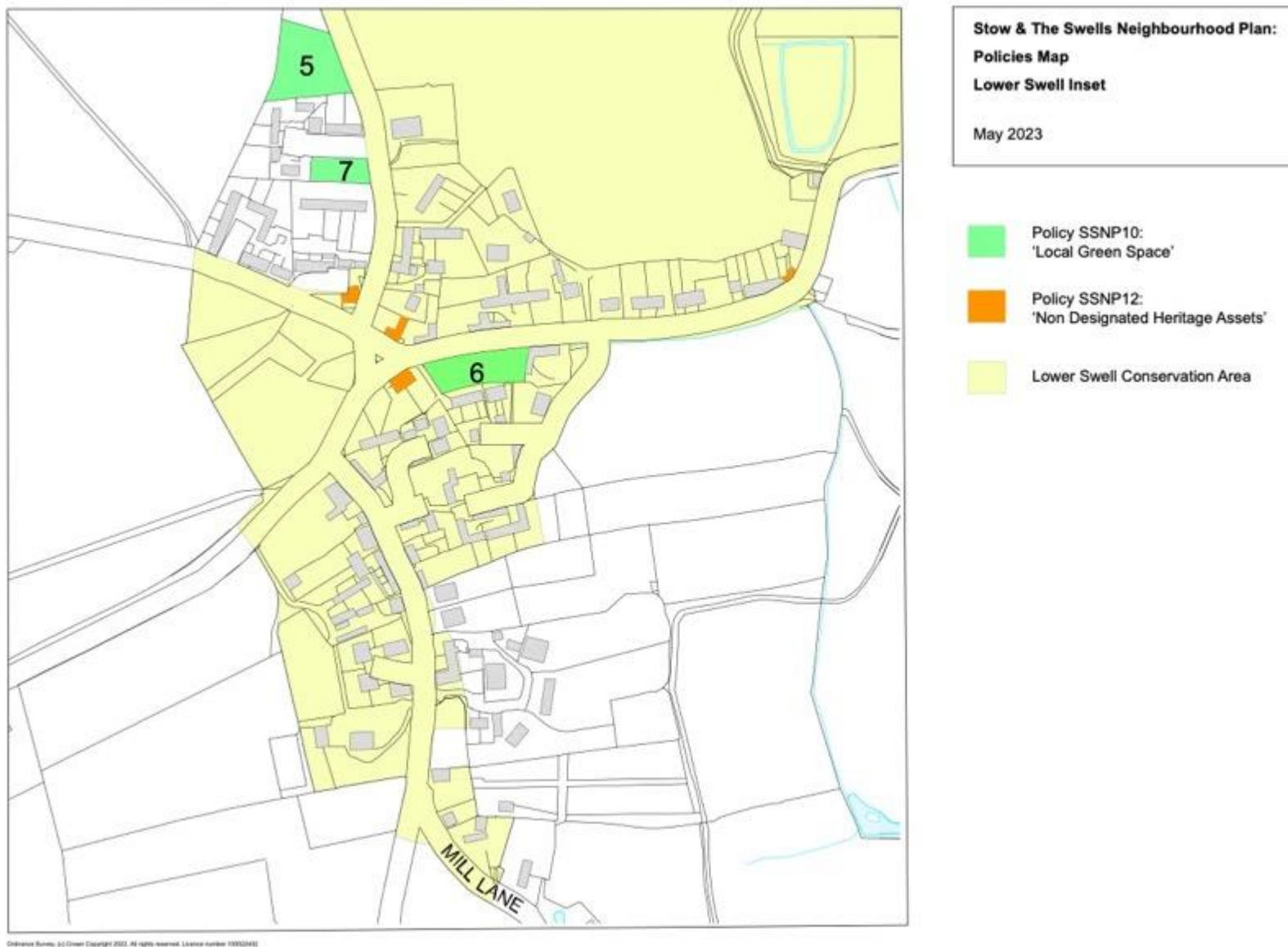
6.4 During the process of preparing the Neighbourhood Plan, there have been many ideas for improving or addressing current problems in the area that lie outside the scope of the land use planning system to control or for which the timing of the plan is too soon. The Town and Parish Councils have noted 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











APPENDIX A: LOCAL GREEN SPACES (SSNP10)

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 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.



QEII 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: Non Designated Heritage Assets (POLICY SSNP12)

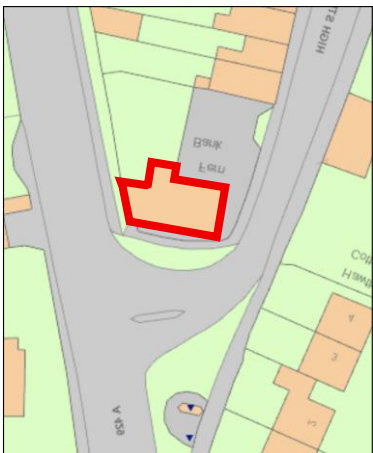
The policy identifies a number of non designated heritage assets. Set out below is a brief description of the local heritage interest of each building.

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.



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 Maugersbury.



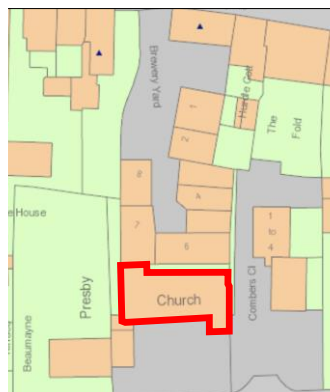
The Old School House, Union Street – impressive former girls school building of 1901 by architect H.W.Chatters, now a home, rock faced with most original architectural details surviving, including cupula tower (visible in views above rooftops from the west), large windows on N and E facades with ogee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



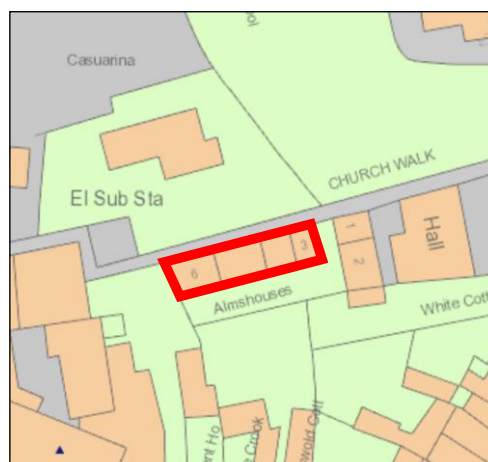
Walter Reynolds Homes, Evesham Road – ‘a fine group of 1928 by Seth-Smith & Monro in two sections set at an angle with gables, mullioned windows and hipped bays’ (Pevsner), almshouses operated by local charity, occupying a prominent site on the NW entrance to the town off Fosseway



Google ©



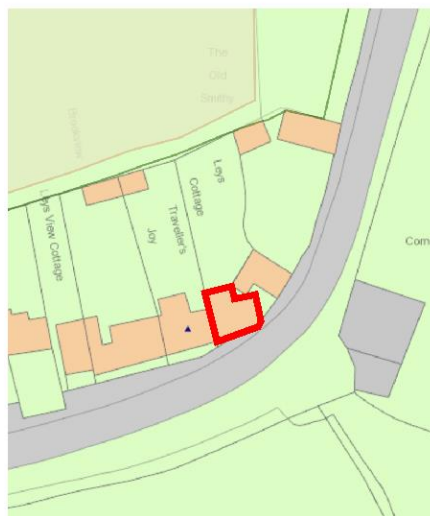
Stow on the Wold Almshouses, Church Walk – a terrace of four and a pair of low, stone one bed cottages facing on to a small communal courtyard with their rear, windowless elevations on to Church Walk next to the grounds St. Edwards Church. The first record of almshouses on this site is in 1594, when 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 (POLICY SSNP7)

INTRODUCTION

The Neighbourhood Plan Steering Group established a sub-group to explore the potential ways in which the plan could make provision for a new enterprise and community facility. The idea was one that came out of the early community engagement activities, which highlighted the weaknesses in the town's current supply of space for local businesses to start up and in its inadequate and aging community facilities. It would also provide a new, modern home for the Town Council itself.

The sub-group looked in detail at the type of facility needed in terms of its compatible uses and the size of the building to accommodate them. It concluded its work in 2021 by producing an ideal specification for what it called a 'business and community barn', and this is set out below. The provision made in the final version of Policy SSNP7 has been iterated as the site opportunity and allocation policy has evolved in liaison with the land interests over the last year. The essence of the specification remains part of the policy but some of the details have been modified in order to deliver a practical and viable facility.

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 SSNP13)

This guidance note sets out how Post-Occupancy Evaluation (POE) should be undertaken to accord with clause B of Policy SSNP13 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 COTSWOLDS AREA OF OUTSTANDING NATURAL BEAUTY (POLICY SSNP7)

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 SSNP7 in the Cotswold Area of Outstanding Natural Beauty (AONB). At the request of the Cotswold Conservation Board during the Regulation 14 consultation period, its checklists for assessing proposals for major development in the AONB have been added for completeness at the end of the statement. Although the checklists are intended to inform proposals at the planning application stage, they have some relevance to site allocation proposals at the plan making stage.

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 and that the scale and extent of the development within AONBs should be limited (§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, retail 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 SSNP7.

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.

CHECKLIST 1: NATURE OF THE PROPOSED DEVELOPMENT

FACTOR	MAJOR DEVELOPMENT CONSIDERATION	Y/N	IS IT POTENTIALLY MAJOR DEVELOPMENT? (Y/N) ¹²	REASONS / JUSTIFICATION / COMMENTS
MISCELLANEOUS CONSIDERATIONS				
Town and Country Planning (Environmental Impact Assessment) Regulations 2017	Is it an EIA Schedule 1 development?	N		As it is an allocation in a Neighbourhood Plan, EIA is not necessary. However, the Plan has been subject to a Strategic Environmental Assessment and a separate Environmental Report has been published. A future planning application may be screened for EIA in the normal way in due course.
	Is it an EIA Schedule 2 development?	N		
	If so, is it above the 'applicable thresholds and criteria'?	n/a		
	If so, would it significantly exceed the 'applicable thresholds and criteria'?	n/a		
Town and Country Planning (Development Management Procedure) (England) Order 2015	Is it 'major development' under the 2015 Order, i.e.:	Y		The allocation is for approximately 170 dwellings.
	(i) The winning and working of minerals or the use of land for mineral-working deposits?	N		
	(ii) Waste development?	N		
	(iii) 10+ dwellings?	N		
	(iv) 1,000 square metres or more of new floor space?	Y		
	(v) Site having an area of 1 hectare or more?	Y		
	If it is (iii), (iv) or (v), would it significantly exceed the relevant thresholds?	Y		
Additional 'nature' considerations under Schedule 3 of the EIA Regulations	Would it involve the production of waste?			N/A
	Does it have the potential to cause pollution or other nuisance?			
	Would it entail the risk of major accidents?			
	Would it entail risks to human health?			
	Would there be a cumulation of adverse effects with other existing / approved development?			
Existing assessments of potential adverse	Do any existing assessments indicate that, for the site or locality in question, the type (and / or scale) of development being proposed might have an adverse impact on any of the factors that contribute to the natural beauty of the Cotswolds	Y		Yes, the evidence produced in support of the site allocation indicates that the development of the site has the potential for adverse AONB impacts, but concludes that there are ways of moderating those impacts to the extent

impacts	National Landscape?			that the public benefits outweigh the residual harm. The development of the site will generate emissions from its construction and occupancy but this must be seen within the context of the social and economic benefits and of the opportunity presented by its non-housing elements to reduce the need for the community to travel outside of the town to access services for employees in the town's businesses and public services to live as far away from the town as they do now to access affordable housing.
	If so, are any of these impacts identified as being potentially significant?	Y		
	Do any existing assessments indicate that the site wouldn't have capacity to accommodate the type (or scale) of development being proposed?	N		
Climate change	Could it exacerbate the impacts of climate change (for example, through significant carbon dioxide emissions)?	N		

FACTOR	MAJOR DEVELOPMENT CONSIDERATION	Y/N	IS IT POTENTIALLY MAJOR DEVELOPMENT? (Y/N) ¹²	REASONS / JUSTIFICATION / COMMENTS
LANDSCAPE – see also ‘Setting’ checklist				
Local Forces for Change	Is it a ‘local force for change’, as identified in the Cotswolds AONB Landscape Strategy and Guidelines for the relevant landscape character type?	Y 15.1		<p>The proposal is a type of Local Force for Change (15.1) and has such has the following potential landscape implications:</p> <ul style="list-style-type: none"> • Encroachment of built development onto the Farmed slopes intruding into the landscape, particularly on the more prominent upper slopes. • Proliferation of suburban building styles, housing estate layout and materials and the introduction of ornamental garden plants and boundary features. • Spread of lit elements on the Farmed Slopes • Potential for glint from buildings, particularly on hillsides. • Degradation of views to and from the Farmed Slopes from the adjacent Pastoral Lowland Vale and Ironstone Hills and Valleys. <p>However, it is not considered that it will undermine local distinctiveness as the policy makes requirements for a planning application to meet a series of key development and design principles. In respect of the outline landscape strategy and guidelines, they seek to:</p> <ul style="list-style-type: none"> • Avoid development that will intrude negatively into the landscape and cannot be successfully mitigated, for example, extensions to settlements onto the Farmed Slopes • Avoid development that may restrict or obscure views to or from the Farmed Slopes. • Ensure new development is carefully integrated into the rural character of the Farmed Slopes • Ensure new development is proportionate and does not overwhelm the existing settlement. • Ensure that new development does not adversely affect settlement character and form • Avoid standardised development layout, suburban style lighting, construction details and materials that cumulatively can lead to the erosion of peaceful rural landscape character. • Control the proliferation of suburban building styles and materials
Potential landscape implications	Could it exacerbate the ‘potential landscape implications’ for the type of development being proposed?	Y		
Landscape strategy and guidelines	Could it conflict with the ‘landscape strategies and guidelines’ for the type of development being proposed?	Y		
Local distinctiveness / design (especially with regards to housing and built development)	Could it undermine local distinctiveness by, for example:			
	• Not being consistent with, or incorporating, the relevant ‘special qualities’ of the Cotswolds National Landscape?	N		
	• Not being consistent with the local distinctiveness / design-related guidelines of the Cotswolds AONB Landscape Strategy & Guidelines for the relevant landscape character types?	N		
	• Not being consistent with the guidance in the Cotswolds Conservation Board’s ‘Cotswolds AONB Local Distinctiveness and Landscape Change’ publication (in relation to: the type, form and distribution of settlements; boundaries; roofs; and walls)?	N		
	Is it designed in a way that does not reflect the status of the Cotswolds AONB as a landscape of the highest quality?	N		

				<ul style="list-style-type: none"> Promote the use of local stone and building styles in the construction of new buildings which should, at least, respect local vernacular style (per the Design Code). Adopt measures to minimise and where possible reduce light pollution. Ensure the historic character and context are included in the Neighbourhood Plan Identify key viewpoints to and from the Farmed Slopes Plant trees and hedges within and around new development to reduce impact on the landscape ideally in advance of the development taking place. Retain existing trees, hedges etc as part of the scheme. Consider the impact on local Public Rights of Way as settlements expand and take into account any required improvements Ensure development proposals safeguard and provide new links and enhancements to the Public Rights of Way network.
SCENIC QUALITY / BEAUTY – see ‘setting’ checklist				
RELATIVE TRANQUILLITY ²⁷ - see also ‘setting’ checklist				
Noise	Could it increase noise levels and / or other aural disturbance within the locality of the proposed development, including for receptors on local public rights of way?	Y		The proposal will increase noise but it will form an integral part of an established, busy town and adjoin the A429 Fosse Way. The increase will therefore be marginal.
	Could it increase noise levels above the ‘lowest observed adverse effect level’? Could it increase noise levels above the ‘significant observed adverse effect level’?	?		
Visual disturbance	Could it increase levels of visual disturbance within the locality of the proposed development (for example, by introducing incongruous and / or intrusive features into the landscape)?	Y		As above.
Traffic	Could it increase overall traffic movements and / or HGV movements on local roads?	Y		An outline traffic assessment has been carried out and is in the evidence base. GCC has not objected to the proposal on highways grounds. The increase in traffic will be marginal (< 10%) to that already present on the A429 and in the town. The land use mix is intended to reduce inward and outward commuting.
	Could it increase overall traffic movements and / or HGV movements on local roads by 10% or more?	N		

Dark skies	Could it introduce lighting / lit elements into a location that currently has no, or very limited, lighting?	Y		The development could increase existing levels of lighting marginally, but not to a degree where it would be considered to be significant. This can be controlled at the planning application stage.
	Could it increase existing levels of lighting / light pollution?	Y		
	Could any associated obtrusive light exceed the limits set out in the Institution of Lighting Professionals’ ‘Guidance Note for the Reduction of Obtrusive Lights’?	N		
RELATIVE WILDNESS – see also ‘Setting’ checklist				
Sense of remoteness	Could it introduce development into an area that is currently perceived to be relatively remote, i.e. an area that currently has:			
	(i) relatively few roads or other transport routes?	N		
	(ii) a perception of being distant from significant habitation?	N		
NATURAL HERITAGE – see also ‘Setting’ checklist				
Biodiversity net-gain	With regards to biodiversity net-gain, could it result in:	No		The site offers opportunity to deliver >10% BNG.
	(i) net-loss?			
	(ii) no net-gain?			
	(iii) net-gain of less than 10%?			
CULTURAL HERITAGE – see also ‘Setting’ checklist				

CHECKLIST 2: SCALE OF THE PROPOSED DEVELOPMENT

FACTOR	MAJOR DEVELOPMENT CONSIDERATION	ANSWER TO MAJOR DEVELOPMENT CONSIDERATION? (Y/N)	IS IT POTENTIALLY MAJOR DEVELOPMENT? (Y/N)	REASONS / JUSTIFICATION / COMMENTS ('SCALE')
Town and Country Planning (Environmental Impact Assessment) Regulations 2017	Is it an EIA Schedule 2 development above the relevant, spatial 'applicable thresholds and criteria'?	N/A	Y	See above.
	If so, would it significantly exceed the relevant, spatial 'applicable thresholds and criteria'?	N/A		
Town and Country Planning (Development Management Procedure) (England) Order 2010	Would it involve the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more?	Y		
	If so, would the new floor space significantly exceed 1,000 square metres?	Y		
	Would it be taking place on a site having an area of 1 hectare or more?	Y		
	If so, would the area significantly exceed 1 hectare?	Y		
Proportionality	Would it be disproportionate to existing development in the locality?	N		The proposal will increase the current housing stock (approx. 1,000) by 17%. This is not considered disproportionate for a Principal Settlement and is considered important in tackling population decline. There is no prospect of the proposal 'overwhelming' the town – the only housing developments of any scale in the last 30+ years have been restricted to older persons accommodation.
	For example:			
	• Would the quantity, size, shape and / or density of any built development be disproportionate to existing development in the locality?	N		
	• Would the amount of material being imported / exported be disproportionate to existing development in the locality?	N		
	For housing developments in, or directly adjacent to, existing settlements:			

	<ul style="list-style-type: none"> • Would it exceed 5% of the size of – and / or the number of dwellings in - the existing settlement? 	Y		
	<ul style="list-style-type: none"> • Would the proposed development, combined with other allocated / approved / recent housing development, overwhelm the existing settlement? 	N		
Strategic / large scale	Would it be of a scale that would be classed as 'strategic' or 'large scale'?	Y		The proposal is not considered 'strategic' at the Local Plan scale (per the NPPF and PPG). At an increase of approx. 17% it is considered 'large scale'. As above, and as per the policy requirements for non-housing benefits, the proposal will serve local needs and arrest the decline and aging profile of its population.
Limited scale and extent ³⁸	Is it a large site (e.g. more than one hectare)?	Y		
	Is there a large quantum of development (for example, a large number buildings or dwellings)?	Y		
	Does the <i>scale</i> of the proposed development exceed what could be considered to be 'limited'?	Y		
	Does the <i>extent</i> of the proposed development exceed what could be considered to be 'limited'?	Y		
Needs of AONB communities	Would it serve needs over and above the needs of local communities within the AONB?	Y		

CHECKLIST 3: SETTING OF THE PROPOSED DEVELOPMENT

FACTOR	MAJOR DEVELOPMENT CONSIDERATION	ANSWER TO MAJOR DEVELOPMENT CONSIDERATION? (Y/N)	IS IT POTENTIALLY MAJOR DEVELOPMENT? (Y/N)	REASONS / JUSTIFICATION / COMMENTS ('SETTING')
LANDSCAPE QUALITY / BEAUTY – see also 'Nature' checklist				
Landscape Character Type (LCT)	Is it located in a LCT that is identified as having high landscape sensitivity and / or low landscape capacity in the 'Landscape Sensitivity' section of the Cotswolds AONB Landscape Strategy and Guidelines for the relevant LCT?	Y		The site is located in 2 LCTs - High Landscape Sensitivity – Farmed Slopes LCT and High Wold LCT. However, as the site is enclosed from the open landscape it is unlikely to have an impact on the key features of the LCTs.
	Does the 'Landscape Sensitivity' section of the Cotswolds AONB Landscape Strategy and Guidelines for the relevant LCT identify that the LCT is particularly sensitive to – and / or have low capacity for - this type of development?	N		
	Is it in a LCT that is reflected in the 'special qualities' of the Cotswolds National Landscape (i.e. Cotswold escarpment, high wolds, and / or river valleys)?	Y		
	Is it in, or close to, more than one LCT?	Y		
	Are any of the key features / characteristics of the relevant LCTs represented in the locality of the proposed development?	Y		
	Could it adversely affect any of these key features / characteristics?	Y		
Landscape and Visual Sensitivity Assessment (LVSS)	Does a LVSS identify the land parcel as having high-medium or high sensitivity to the type of development being proposed?	N/A		A full LVSS will be undertaken by the applicant following the allocation of the site in this plan. In all these respects there is the potential for adverse impacts on the AONB. However, the outline Landscape Assessment in the evidence base indicates that any potential harm can be moderated to the extent that other public benefits outweigh that harm.
Landscape and Visual Impact	Are any of the relevant landscape receptors 'high value'?	N/A		
	Are any of the relevant visual receptors 'high value'?	N/A		

AONB Special Qualities	Are any of the 'special qualities' of the AONB represented in the locality of the proposed development?	Y		The site adjoins the settlement boundary of Stow along its longest (western) side and the settlement pattern extends much further to the east below the site. It is therefore not considered to be located in the 'open countryside' and it lies within a maximum 800m level walking distance from the full range of town services.
	If so, could it adversely affect any of these special qualities?	Y		
Proximity to existing development	Is it located beyond the boundary of existing development (i.e. in the open countryside)?	Y		
	For housing, is it located outside the settlement boundary?	Y		
	Is it non-contiguous with (i.e. detached from) existing development and / or the settlement boundary?	N		
	Is the development isolated from existing development and / or services?	N		
SCENIC QUALITY / BEAUTY – see also 'Nature' checklist				
Rights of Way	Is it located close to / visible from Public Rights of Way, including (in order of hierarchy):	Y		As above.
	• Cotswold Way National Trail (and / or National Trail circular walks)?	N		
	• County long-distance walks (e.g. Gloucestershire Way)?	N		
	• Other named routes (e.g. Macmillan Way)?	Y		
	• 'Unbranded' rights of way?	Y		
	Could it adversely affect views for receptors on these Public Rights of Way?	N		
Viewpoints	Is it located close to / visible from key viewpoints (e.g. viewpoints marked on Ordnance Survey maps or recognised in a Neighbourhood Development Plan)?	Y		
	Could it adversely affect views for receptors at these key viewpoints?	N		
Access land / common land	Is it in / close to / visible from access land or common land?	N		
	Could it adversely affect views for receptors on this access land / common land?	N		

Landscape Character Types (LCTs)?	Could it adversely affect views that are specified as key features / characteristics of the relevant LCTs?	Y		
	Could it adversely affect views between two or more LCTs?	Y		
RELATIVE TRANQUILLITY – see also 'Nature' checklist				
Relative tranquillity	Is it located in an area of relatively high tranquillity and / or low noise pollution (i.e. relatively free of traffic noise, urban development, low flying aircraft, power lines and / or similar influences)?	N		The location is not tranquil. It lies alongside the A429 Fosse Way and the town's main superstore with the rest of the town to its immediate west and south.
Dark skies	Is it located in an area with relatively low levels of night-time light pollution?	N		As above.
RELATIVE WILDNESS – see also 'Nature' checklist				
Sense of remoteness	Is there a sense of remoteness in the locality of the proposed development, with:			As above.
	(i) relatively few roads or other transport routes?	N		
	(ii) a perception of being distance from significant habitation?	N		
Relative lack of human influence	Are there extensive areas of semi-natural vegetation in the locality of the proposed development?	N		
	Are there uninterrupted tracts of land with few built features and few overt industrial or urban influences, in the locality of the proposed development?	N		
NATURAL HERITAGE -- see also 'Nature' checklist				
Nature conservation designations	Is it located in, or in close proximity to, any nature conservation designations, including:			
	(i) international-level nature conservation designations?	N		
	(ii) national-level nature conservation designations?	N		
	(iii) local-level nature conservation designations?	N		
	Could it adversely affect any nature conservation designations?	N		

Priority habitat	Is it located in, or in close proximity to, any priority habitats, including:	
	(i) those that are aligned to the relevant 'special qualities' of the Cotswolds AONB (i.e. flower-rich grasslands and ancient broadleaved woodland)?	N
	(ii) those listed in Appendix 8 of the Cotswolds AONB Management Plan 2018-2023?	N
	(iii) irreplaceable habit, including ancient woodland?	N
	(iv) other priority habitat not covered in (i) – (iii)?	Y
	Could it adversely affect any priority habitats?	N
Species	Is it located in, or in close proximity to, any sites that have:	
	(i) protected species?	N
	(ii) priority species (particularly those listed in Appendix 8 of the Cotswolds AONB Management Plan 2018-2023)?	Y
	Could it adversely affect any protected / priority species?	N
Nature recovery networks	Is it located in, or close proximity to, a nature recovery network area?	N
	Could it adversely any nature recovery network areas?	N
Geological designations	Is it located, or in close proximity to, any geological designations, including:	N
	(i) national-level geological designations?	N
	(ii) regional / local-level geological designations?	N
	Could it adversely affect any geological designations?	N
CULTURAL HERITAGE – see also 'Nature' checklist		
Heritage / historic environment assets	Is it located in, or in the setting of, any heritage assets, including:	
	(i) international-level heritage designations (e.g. World Heritage Sites)?	N

FACTOR	MAJOR DEVELOPMENT CONSIDERATION	ANSWER TO MAJOR DEVELOPMENT CONSIDERATION? (Y/N)	IS IT POTENTIALLY MAJOR DEVELOPMENT? (Y/N)	REASONS / JUSTIFICATION / COMMENTS ('SETTING')
	(ii) national-level heritage designations (e.g. scheduled monuments, listed buildings, battlefields, registered parks and gardens)?	Y		There is a scheduled monument beyond the site boundary to the south. There are no listed buildings in its vicinity. Its south-western corner lies in the Stow Conservation Area (but this land is not within the proposed developable area). Some of the northern part of the site may lie on the periphery of the Battle of Stow but this is uncertain. Further evidence may be available by the time of a planning application.
	(iii) local-level heritage designations (e.g. Conservation Areas)?	Y		
	(iv) non-designated heritage assets?	?		
	Could it adversely affect any designated heritage assets?	Y		
	Could it adversely affect any non-designated heritage assets?	?		
Cultural associations	Is it located in, or in close proximity, to a site / view / landscape of importance for its cultural associations?	N		
	Could it adversely affect the cultural associations of any of these sites / views / landscapes?	N		

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.

The land interests responded by providing concept proposals that the Town Council used to engage with the community again in June/July 2022, seeking to understand a) if a majority of the community were still interested enough in securing public benefits to support a large development scheme on the edge of the town and b) if so, which of the two sites would they prefer. It also requested that its strategic environmental assessment (SEA) consultants, AECOM, to assess the sites as ‘reasonable alternatives’.



Land East of the Town (south of Broadwell Lane)

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 land interest of the south-eastern land (shown below) focused the concept on the lower of the two sites making up the larger parcel, indicating that the scheme could extend on to the northern parcel at a later stage. It too offered a range of proposals in response to the brief.

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 (SSNP7) 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 SSNP7 of the Neighbourhood Plan.

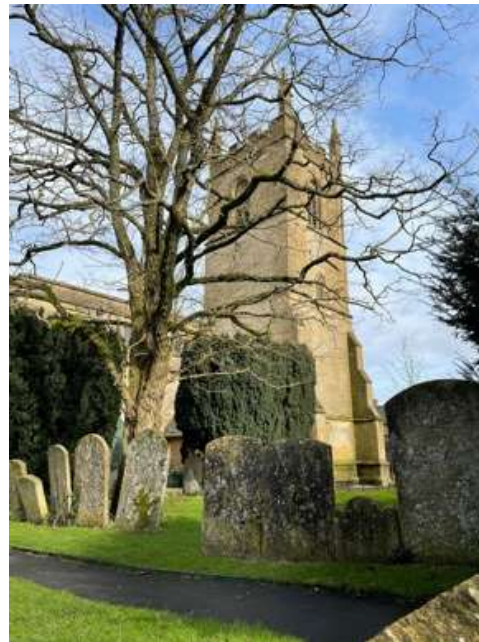
APPENDIX G: EVIDENCE BASE

- 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 North East of Stow technical reports (various)
- Gloucestershire Historic Environment Record
- Natural England Magic Map

STOW ON THE WOLD & THE SWELLS

Neighbourhood
Plan

STOW ON THE WOLD AND THE SWELLS DESIGN CODE



SEPTEMBER 2023

STOW ON THE WOLD AND THE SWELLS DESIGN CODE

SEPTEMBER 2023

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STOW ON THE WOLD AND THE SWELLS DESIGN CODE

SEPTEMBER 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 the defined Character Areas 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. The District Code alone applies to proposals located elsewhere in the Neighbourhood Plan Area.

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.

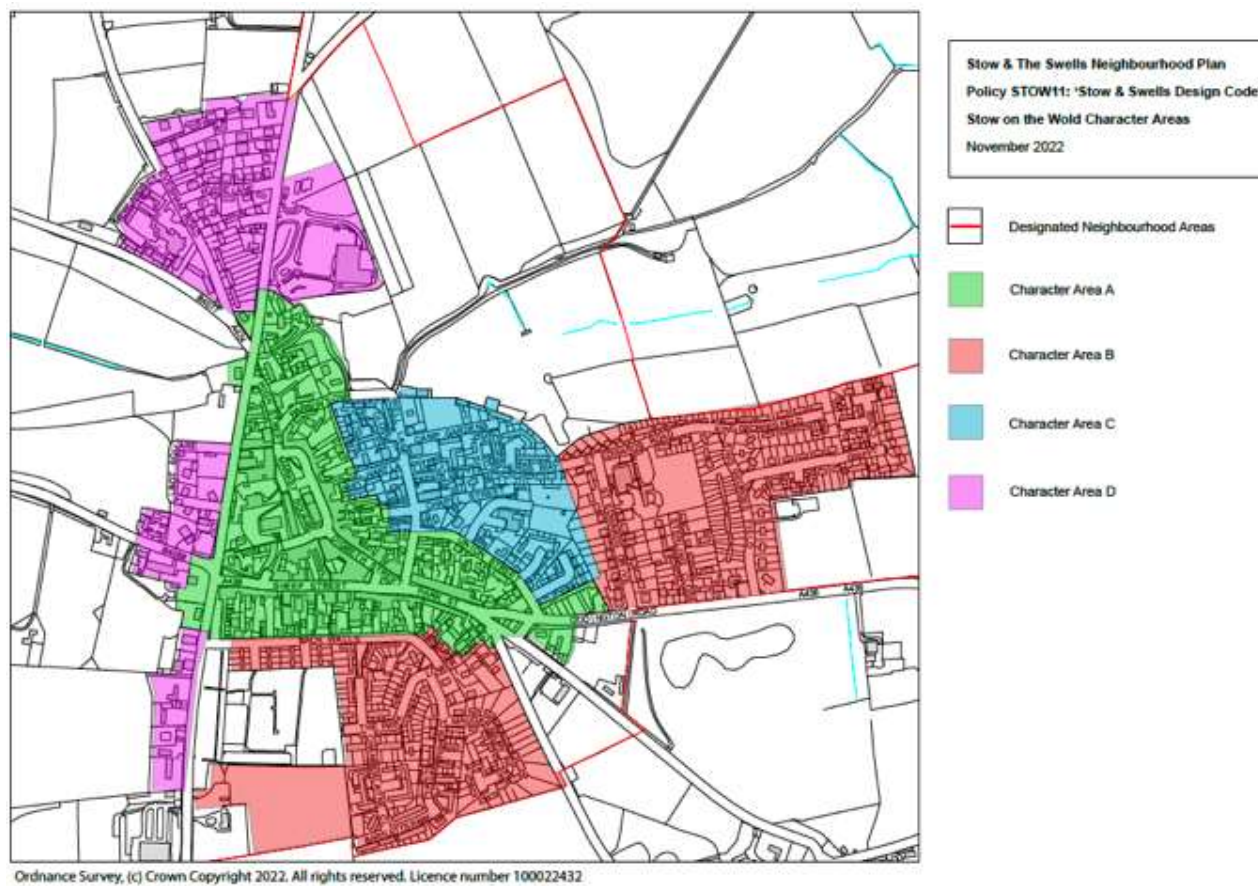
1.3 The Code has been prepared in accordance with the National Model Design Code and its Guidance Notes published by the Government in 2021 as relevant to this area and policy context. The ease of use and effectiveness of the Code will be monitored over the Neighbourhood Plan period. Modifications will 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

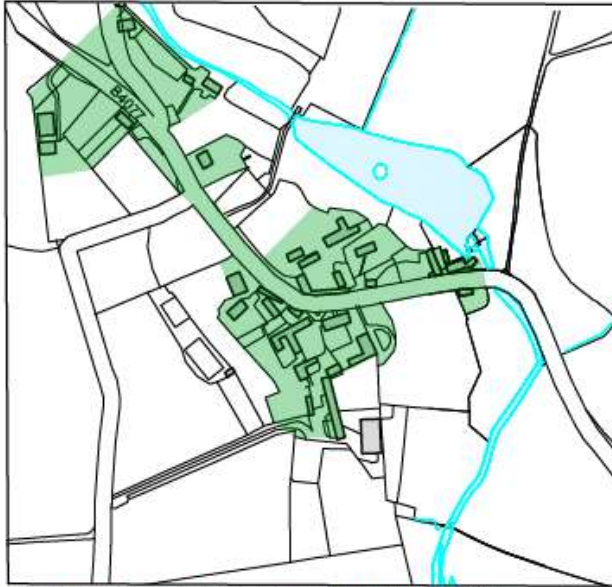
2.1 The District Code sets out 67 design principles, grouped by design theme, and coded D1 – D67. Many principles are generic and apply to all development proposals in the District; some relate to the design process; and some require attention is paid to the location and design context of the proposal. 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.

2.2 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. The Code has not covered every part of the District Code for every Character Area and where this is the case, the District Code alone forms the guidance for development proposals. For example, the District Code sets out the principles for delivering green infrastructure (D66); the Code refines these principles in some Character Areas where this is considered helpful, but not in others. 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 Character Area 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
	<p style="text-align: center;">LANDSCAPE, SETTLEMENTS AND STREETS</p>
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).

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.

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 burgage) 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.

CODING All development proposals must retain these essential building and plot form characteristics.

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
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- 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 Maugersbury 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

	<p>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.</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	
D16A D17A	<p><i>“New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context.”</i></p> <p><i>“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.”</i></p> <p>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.</p> <p>CODING Proposals for taller or bulkier buildings, whether at prominent locations in the streetscene or not, are not suitable in the Conservation Area.</p>



D18A

"The height of new buildings should respond to the local context, for example forming a gentle transition from open countryside to settlement edge."

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.



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.

ARCHITECTURAL STYLE: COTSWOLD VERNACULAR

D21A *"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."*

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 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	<p><i>"Some key qualities of the Cotswold vernacular are...."</i></p> <p>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.</p> <div data-bbox="457 440 1108 933" data-label="Image"> </div> <div data-bbox="1123 435 1675 933" data-label="Image"> </div> <p>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:</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
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	<ul style="list-style-type: none"> • 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
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>"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</p>

	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.
MATERIALS AND CRAFTMANSHIP	
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 unless it is surviving or repaired limewash.</p> <p>CODING Roughcast or other rendering (other than limewash) 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 slate is only acceptable on outbuildings and extensions to Listed Buildings on which it is already present. Roofs of non-Listed Buildings should be repaired or replaced either with Cotswold Stone tiles (especially where it is located in the immediate setting of a Listed Building with this same material) or modern equivalent tiles that are of a similar quality of appearance.</p>
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, or pantiles or wall hanging with tiles 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 muted colours for the painting of their windows and doors in the Conservation Area, which complement the subtle tones of the Cotswold Stone of buildings. Stronger primary colours were more common for shopfronts in Victorian times.</p> <p>CODING The use of primary and other, non-polite colours for painting timber is not appropriate in the Conservation Area, unless for a shopfront.</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>
<p>SUSTAINABLE DESIGN</p>	
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>
<p>KEY DESIGN CONSIDERATIONS</p>	
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 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. Excessive lighting of signs (such as internally illuminated signs or the use of neon) should be avoided.</p>

CODE NO.	CHARACTER AREA B: STOW ON THE WOLD: SOUTH AND EAST
LANDSCAPE, SETTLEMENTS AND STREETS	
D9B D10B	<p><i>"Each site will have its own characteristics and a specific landscape setting."</i></p> <p><i>"Settlements ... have their own unique layouts and patterns of streets."</i></p> <p>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 Maugersbury Park estate of the 1970s.</p> <div data-bbox="289 857 1033 1328">  </div> <div data-bbox="1045 857 1873 1328">  </div>

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. However, the Park Estate adopted a material palette and building form as a modern (1950s) interpretation of the Cotswold vernacular and so there is more that binds it visually with the Conservation Area than contrasts with it, which is not true of the St.Edwards Road area.

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. 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.

The Park Estate lies on the narrow plateau along the hill top and is enclosed from the wider landscape by the Maugersbury 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 Maugersbury 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.

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/Maugersbury estates have layouts with a combination of long straight sections, gentle and tight curves and cul-de-sacs with no over-riding character.

	<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> <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>



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: 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. The St. Edwards area does not have this same character.</p>



CODING Proposals in the Park Estate should adopt the Cotswold vernacular style. Those in the St. Edwards area should follow the vernacular in their domestic scale and form, but may use other materials common to the area.

MATERIALS AND CRAFTMANSHIP

D54B *"There are also examples of red brick walls and other boundary treatments ..."*

CONTEXT: The area contains examples of many modern boundary treatments such as low stone walls and hedges.

CODING The use of red brick for walls and boundary treatments is appropriate other than in the Parks estate area.

	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.	CHARACTER AREA C: STOW ON THE WOLD: NE EDGE OF TOWN CENTRE
LANDSCAPE, SETTLEMENTS AND STREETS	
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>
<p>SCALE AND PROPORTION</p>	
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 *"Some key qualities of the Cotswold vernacular are...."*

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.

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:

- 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 <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. There has been some use of contemporary design and/or materials in new and altered buildings in the Character Area, in part to achieve higher standards of energy performance.</p>



CODING Proposals for a new building or for the modification to an existing building to deliver improved energy and other sustainability performance should not be located prominently in the streetscene and should not harm any historical character of the 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.

	<p>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> <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>
<p style="text-align: center;">GREEN INFRASTRUCTURE</p>	
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>

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

“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 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.



CODING Proposals for alterations or extensions to existing properties should retain existing off-street parking.

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>
<p>SCALE AND PROPORTION</p>	
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>



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.

	ARCHITECTURAL STYLE: COTSWOLD VERNACULAR
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 *"On many listed buildings, in some prominent locations,.....a contemporary building may appear too starkly out of keeping....."*

CONTEXT Modern methods of construction and materials are common.



CODING Proposals for contemporary architectural styles may be appropriate in principle.

MATERIALS AND CRAFTMANSHIP

D36D “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. There has over the last century or so been some use of blue slate as a substitute for stone roof tiles.

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.

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.

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>
<p style="text-align: center;">GREEN INFRASTRUCTURE</p>	
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
<p style="text-align: center;">LANDSCAPE, SETTLEMENTS AND STREETS</p>	
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 style="display: flex; justify-content: space-around; align-items: flex-end;">   </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	<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 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).</p>



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.

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

	<p>– 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>



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

- D16E *“New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context.”*
- D17E *“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.”*
- D18E *“The height of new buildings should respond to the local context, for example forming a gentle transition from open countryside to settlement edge.”*

	<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 style="text-align: center;">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.



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:

- 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 *"Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition ... The decision*
D30E *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....."*

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



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	<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>
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>
<p style="text-align: center;">SUSTAINABLE DESIGN</p>	
D62E	<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

D66E *High quality, well integrated and carefully designed green infrastructure (GI) and landscape provision is crucial to the long-term success of developments....."*

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.

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.


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="690 821 1530 1377">  </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>



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 *"New buildings should be carefully proportioned and relate to the human scale and to their landscape or townscape context."*
- D17F *"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."*
- D18F *"The height of new buildings should respond to the local context, for example forming a gentle transition from open countryside to settlement edge."*

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.



	<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.</p>
D25F	<p><i>“Some key qualities of the Cotswold vernacular are....”</i></p> <p>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> <p>CODING: 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

D22F *"Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition ... The decision*
D30F *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....."

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.</p>
<h2 style="text-align: center;">MATERIALS AND CRAFTMANSHIP</h2>	
D36F	<i>“ The colour of Cotswold Stone varies across the District..... and rich honey colours in the North.....”</i>
D37F	<i>“There are various styles of walling stone within the Cotswolds. Many higher status buildings are constructed in ashlar stonework. This</i>
D38F	<i>consists of straight cut, finely tooled blocks of stone, laid to their natural bed, with very tight mortar joints. ”</i>
D39F	<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>
<p style="text-align: center;">SUSTAINABLE DESIGN</p>	
D62F	<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

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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STOW ON THE WOLD & THE SWELLS

Neighbourhood *Plan*

2023 – 2031



BASIC CONDITIONS STATEMENT

Published by Stow on the Wold Town Council
under the Neighbourhood Planning (General) Regulations 2012 (as amended)

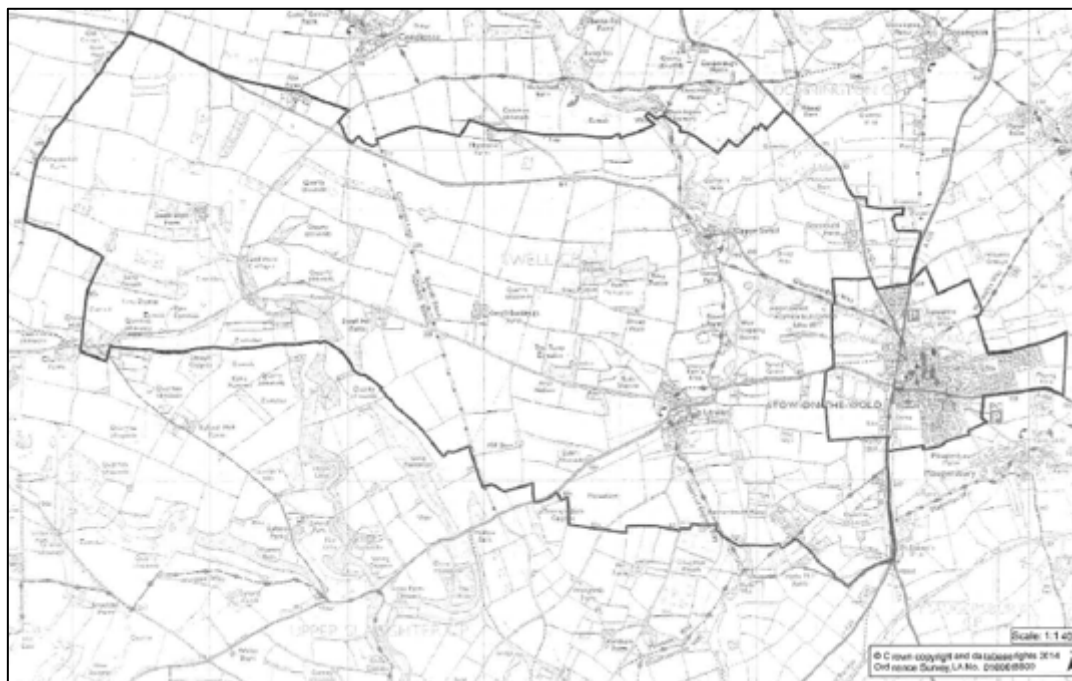
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1.INTRODUCTION

1.1 This statement has been prepared by The Stow on the Wold Town Council (“the Town Council”) to accompany its submission of the Stow on the Wold & The Swells Neighbourhood Plan (“the Neighbourhood Plan”) to the local planning authority, Cotswold District Council (“CDC”), under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (“the Regulations”).

1.2 The Neighbourhood Plan has been prepared by the Town Council defined as the ‘Qualifying Body’ as per the regulations, but the Neighbourhood Area (“the Area”), covers and coincides with the boundary of The Swells Parish, as well as that of Stow on the Wold (see Plan A below). The Area was designated by the CDC in April 2015.



Plan A: The designated Stow on the Wold and Swells Neighbourhood Area

1.3 The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Area. They do not relate to ‘excluded development’, as defined by the Regulations. The plan period of the Neighbourhood Plan is from 2023 to 2031, the end date of which corresponds with the plan period of the Cotswold Local Plan (“the Local Plan”), which currently is undergoing a partial update. This will enable the two plans to neatly operate alongside each other and to be monitored and reviewed on a similar timeframe.

1.4 The statement addresses each of the four ‘Basic Conditions’, which are relevant to this plan, required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Town & Country Planning Act.

1.5 The Regulations state that a Neighbourhood Plan will be considered to have met the Conditions if:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Development Plan,
- b) (Not relevant for this Neighbourhood Plan),
- c) (Not relevant for this Neighbourhood Plan),
- d) The making of the Neighbourhood Development Plan contributes to the achievement of sustainable development,
- e) The making of the Neighbourhood Development Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- f) The making of the Neighbourhood Development Plan does not breach and is otherwise compatible with EU obligations.

1.6 The responsibility for determining if a Neighbourhood Plan has had regard to national policy and is in general conformity with strategic policy rests with a combination of the qualifying body, the local planning authority and the independent examiner (Planning Practice Guidance §41-070 and §410-074). Case law, established in the Tattenhall Neighbourhood Plan in 2014 (see §82 of EWHC 1470) but endorsed by the Courts on a number of occasions since, makes clear that:

“... the only statutory requirement imposed by Condition (e) is that the Neighbourhood Plan as a whole should be in general conformity with the adopted Development Plan as a whole ... any tension between one policy in the Neighbourhood Plan and one element of the ... Local Plan (is) not a matter for the Examiner to determine.”

2.BACKGROUND

2.1 The decision to proceed with a Neighbourhood Plan was made firstly by the Town Council in 2015. The key driver of this decision was a sense of wanting to plan positively for a more sustainable future of the town but recognising that its neighbours, Lower and Upper Swell, were close by, it invited Swells parish to form a multi-parish Neighbourhood Area, which it accepted. As the plan area is wholly located within the Cotswolds Area of Outstanding Natural Beauty (AONB), it was important to both Councils to present a vision which protects the special qualities of the AONB and encourages development that meets the needs identified by the community.

2.2 A committee was formed comprising representatives of the Councils and residents of the Parishes. The group has been delegated authority by the Councils to make day-to-day decisions on the preparation of the Neighbourhood Plan. However, as the qualifying body, the Stow Town Council approved the publication of the Pre-Submission plan in February 2023 and the Submission Plan now.

2.3 The Town Council has consulted the local community extensively over the duration of the project as it became clear early on that a significant number of residents wanted the project to tackle longstanding problems and to innovate in finding workable solutions. With this in mind, the project has naturally focused on the town, accepting that the same early engagement in the Swells indicated a preference for the villages and their surrounding countryside to remain much as they are now. As the policy ideas evolved, especially in the period since the Covid lockdowns, which significantly hampered progress, so the Town Council sought to engage with other stakeholders, notably Broadwell and Mangersbury parish councils, the Cotswold Conservation Board (CCB), Gloucestershire County Council (GCC) and land interests. The nature and outcome of these various publicity and consultation exercises are set out in the separate Consultation Statement.

2.4 The Town Council has also sought to work closely with officers of the CDC to collate and examine the evidence base, to design and iterate policy proposals and to define the proper relationship between the Neighbourhood Plan and the adopted and emerging Local Plans. Once the vision, objectives and especially policies promoting a new spatial plan had been clarified it became very important that the Town Council explained and evidenced its proposals to CDC, acknowledging that they represented a (non-strategic) departure from some of the past trends in development plan policy for the town. Officers have been helpful in advising on how the case for change in an AONB setting should be made and evidenced, as has the advice of the CCB.

2.5 The Neighbourhood Plan contains 16 land use policies (coded SSNP1 – SSNP16), which are defined on the Policies Map where they apply to a specific part of the Area. The Plan has deliberately avoided containing policies that duplicate adopted development plan policies or national policies that are already used to determine planning applications in the Area. The policies are therefore a combination of site-specific allocations or other proposals and of development management matters that seek to refine and/or update existing policies.

3. CONDITION (A): REGARD TO NATIONAL PLANNING POLICY

3.1 The Neighbourhood Plan has been prepared with full regard to national policies as set out in the National Planning Policy Framework (NPPF) and of the Planning Practice Guidance (PPG) in respect of formulating Neighbourhood Plans. In overall terms, there are four NPPF paragraphs that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded:

General Paragraphs

3.2 The Town Council believes the Neighbourhood Plan “support(s) the delivery of strategic policies contained in local plans ... and ... shape(s) and direct(s) development that is outside of these strategic policies” (§13). It considers the Neighbourhood Plan contains only non-strategic policy proposals or proposals that refine strategic policy to fit the circumstances of the Area without undermining the purpose and intent of those strategic policies (§18). It considers that the Neighbourhood Plan sets out more “detailed policies for specific areas” including “the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies” (§28).

3.3 The Parish Council considers that its Neighbourhood Plan has provided its communities the power to develop a shared vision for the Area that will shape, direct, and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. The Plan is underpinned by relevant and up-to-date evidence. This is considered to be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (§31).

Specific Paragraphs

3.4 Each policy engages one or more specific paragraphs of the NPPF. Those that are considered to be of the most relevance and substance are identified in Table A below.

Table A: Neighbourhood Plan & NPPF Conformity Summary			
No.	Policy Title	NPPF Ref.	Commentary
SSNP1	The Stow on the Wold Development Boundary	16	The policy redefines the Development Boundary for Stow on the Wold as set out in the Local Plan, to include the completion of the surgery development on Maugersbury Road and the site allocation in Policy SSNP7. The policy repeats the Local Plan provisions in distinguishing the built-up area from the surrounding countryside so it is evident how a decision maker should react to development proposals as per §16, and so that the policy retains its full weight in §14 is engaged in decision making (i.e. to avoid a dependence on the Local Plan in this respect). It is therefore a necessary duplication per §16.
SSNP2	Development in The Swells and the Countryside	16, 78, 80, 174, 176	<p>The policy sets out principles for development in Lower and Upper Swell and the rest of the countryside of the neighbourhood area. The policy is consistent with §16 in clarifying the types of development that are suitable in each settlement based on their settlement character in accordance with strategic countryside policy, per §78 (rural development) on the one hand and §174 (natural environment) and §176 (protected landscapes) on the other.</p> <p>Due to the sensitive nature of the surrounding countryside, which is wholly located in the Cotswold AONB, proposals for isolated homes in the countryside that are argued solely on the grounds of §80(e) are ruled out by the policy as it is considered that there is no location in this Area where the AONB would be enhanced rather than harmed by such a proposal, which no level of architectural quality could redeem. It does not prevent proposals coming forward to seek benefit from other clauses in §80.</p>
SSNP3	Housing Mix	61, 72	This policy has two parts. Firstly, it sets out the requirements for the delivery of affordable homes in Stow. Planning Practice Guidance allows for the minimum discount of First Homes to be amended through local or neighbourhood plans. In essence the policy reflects the spirit and intention of §72 to deliver a wide choice of homes that reflects local demand by seeking to ensure that the First Homes product is affordable in the town. The Government's plans for the delivery of First Homes were set out in a Written Ministerial Statement in April 2021, but it is considered that First Homes in practice is the

			same sale product as entry-level homes. Secondly, it seeks to influence housing mix for housing developments to deliver a wide choice of homes that reflects local demand and to create a demographically balanced community (§61).
SSNP4	Principal Residence	31, 78	The policy is in accordance with §31 which states that ‘the preparation and review of all policies should be underpinned by relevant and up-to-date evidence’. The Stow on the Wold and the Swells Housing Needs Assessment (2022) concludes that the substantial proportion of second home ownership in the neighbourhood area is ‘having a significant impact on the availability of tenures in the area and consequently housing affordability’. The policy attempts to ensure new housing schemes – most especially that proposed in Policy SSNP7 – do not fall foul of the same trend and are as responsive to local needs as possible per §78.
SSNP5	Specialist Accommodation for Older People in Stow	63, 78	The policy is intended to slow down the supply of age-restricted housing in Stow on the Wold for the plan period as part of the plan’s affordable housing objective, in order to achieve a mixed and balanced community (§63). Stow has a significant supply of age restricted homes, with the only major housing developments of the last two decades in the town being of this type (serving a market that is very much larger than the town or district alone, given its attractions). Combined with an aging population demographic, and a declining population (5% since 2001), this trend is running counter to the ‘balanced community’ objective. Places like Stow simply cannot ‘predict and provide’ for older persons housing in a way encouraged by national policy without increasingly serious sustainability consequences.
SSNP6	Health and Well Being	92, 93	The policy intends to encourage sustainable and healthy communities per §92 with access to green infrastructure per §93.
SSNP7	Land of North East of Stow	60, 62, 73, 79, 82, 84, 86, 93, 104, 105, 106, 126, 129, 174, 175, 176, 177, 179	The policy allocates land for a low or zero carbon residential-led, mixed use development consisting of approximately 170 homes in total: approximately 100 open market homes and approximately 70 affordable homes. It will therefore make the most significant contribution to ‘boosting the supply of homes’ (§60) in the town for 30+ years. The ‘size, type and tenure of housing needed for different groups in the community’ has been assessed (§62), along with the objective of arresting population decline in this rural area per §79. The allocation acknowledges that ‘the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing towns, provided they are well located (it is) and designed (it will be, per the Design Code), and supported by the necessary infrastructure and facilities including a genuine choice of

			<p>transport modes (it will be, given its locational advantages), per §73. The boost to the size of the town's population should bolster the local economy – a larger local workforce that does not need to commute long distances from more affordable locations outside the Cotswolds, that will spend some of its money in the town's businesses, and that will use local schools and other services, per §82(c) and §84(a).</p> <p>Another economic benefit will be in enabling public realm improvements to the Market Square to boost its businesses and in driving greater footfall per §86. Its new business units will further boost the local economy and its new community hub will make a step change in the provision of this type of facility per §93(a). Its transport effects have been assessed in principle and show that a) the traffic it generates will not be significant in the context of the town and A429 Fosse Way and b) the scheme should reduce the need for other trips in and out of the town to access work and services per §104(a) and §105. The site is also well connected to the town centre and the rest of the town per §104(c) and §106(d). The scheme will be controlled by the Design Code, with the 1950s Park Estate in the town identified for its inspiration for working with the Cotswold vernacular, per §126 and §129. Great weight has been placed on the location of the town in the Cotswold AONB (§176) and the justification for the scheme is set out in full in Appendix F of the Plan per the tests of §177. The scheme will provide at least 20% onsite biodiversity net gain per §179(b) and the policy also requires that the mature tree and hedgerows within the site boundaries are retained. By demonstrating that the site can deliver a suitable scheme it is considered that on balance, this allocation, with its specific mitigation measures set out as requirements has had proper regard to the NPPF as a whole and will deliver sustainable development.</p>
SSNP8	Stow Town Centre & Market Square	86	The policy sets out the boundaries for the Stow on the Wold Town Centre and defines Market Square as a primary shopping area, as outlined on the Policies Map. The policy makes clear the range of uses which are appropriate for the Town Centre and the Market Square (§86b). The aim is to sustain a retail-led mix of commercial uses within the Town Centre to promote its long-term vitality and viability.
SSNP9	Playing Field Facilities	93, 98	The policy supports the enhancement of two important community facilities in the town (§93) that serve as vital sports and recreation assets (§98).
SSNP10	Local Green Spaces	101, 102, 103	The policy responds to the provisions of §101 to make designation proposals, informed by its evidence base in respect of meeting the tests of §102. Its wording then reflects the Green Belt equivalency of §103.

SSNP11	Stow and the Swells Design Code	127, 128, 129	'Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development' (§127). The policy seeks to bring 'clarity about design expectations' within the Parishes (§128). The specific matters included in the policy 'provide a framework for creating distinctive places' to deliver a 'consistent and high-quality standard of design' (§128). These goals are captured in the Design Code (§129) that has been formulated to refine and work alongside the adopted, districtwide, Cotswold Design Code.
SSNP12	Non Designated Heritage Assets	203	This policy identifies a number of non-designated heritage assets to engage the provisions of §203. They have been derived in accordance with the guidance published by Historic England.
SSNP13	Zero Carbon Buildings	152, 154	This policy is intended as an interim measure pending either the adoption in the Local Plan Review of a similar policy covering the whole district or an acceleration towards the same objective than is currently proposed by the Government in its Future Homes Standard. It is intended here to help shape future development in the neighbourhood area in a way that contributes to radical reductions in greenhouse gas emissions as encouraged by §152. This will be primarily through the use of a Post Occupancy Evaluation reporting process to ensure that energy performance standards are met once built and occupied per §154(b). It encourages the adoption of zero carbon standards like PassivHaus as they will deliver and certify better energy performance, hence such proposals being exempt from that reporting process. It is therefore vital to note that the policy does not make the PassivHaus (or equivalent certified standard) a requirement. Rather it is encouraging of such proposals even though such a provision is bound to be in place nationally within the next five years and many developers are already planning for delivering to this standard in their layouts and building specifications.
SSNP14	Walking & Cycling in the Town and Parish	104	The policy requires that transport issues are considered from the earliest stages of development proposals so that opportunities to promote walking and cycling are identified and pursued (104c).
SSNP15	Vehicle Parking	104, 107	This policy has two parts. Firstly, it seeks to ensure that proposals consider parking as integral to the design of schemes (104e) so that existing serious parking problems, which are particularly present in the town, are not exacerbated. Secondly, it encourages proposals which bring forward shared off-street vehicle parking in Lower Swell provided that it does not harm the appearance and special historic character of the Conservation Area or cause significant harm to the amenities of local residents. Such proposals should also include provision for EV charging (107e).

SSNP16	Digital infrastructure	114	This policy is in accordance with NPPF paragraph §114 in highlighting the importance of advanced, high quality and reliable communications networks.
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3.5 It is considered that all the policies have had full regard to national policy.

4. CONDITION (D): CONTRIBUTING TO ACHIEVING SUSTAINABLE DEVELOPMENT

4.1 Given the intended scope of the Neighbourhood Plan, the Councils and CDC agreed that an SEA would be necessary as a matter of principle and the Councils proceeded to appoint AECOM to prepare first a scoping report for a Sustainability Appraisal (SA/SEA) in November 2020 for consultation with the statutory bodies and then draft and final SA/SEA reports at the Pre-Submission and Submission stages. CDC provided a formal screening opinion confirming the need for an SEA in October 2020.

4.2 The separate SA/SEA Report sets out the sustainability effects of the policies of the Neighbourhood Plan. The Report concludes:

“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.”

5. CONDITION (E): GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

5.1 The Neighbourhood Plan has been prepared to ensure its general conformity with the strategic policies of the Local Plan, which covers the period 2011 – 2031. In doing so, the Councils has worked closely with the CDC with the aim of ensuring that both consider this basic condition has been fully met.

5.2 The Local Plan defines Stow on the Wold as a 'Principal Settlement' in the Mid Cotswold Sub-Area in its settlement hierarchy. Its policy DS1 (Development Strategy) identifies the Principal Settlement as the focus of the strategy for housing and employment allocations. Policies DS2 and DS4 operate a development boundary mechanism to focus development within the built-up area of the settlements.

5.3 The Neighbourhood Plan has sought to add value to the Local Plan by refining some of its policies to better fit with the Stow on the Wold and the Swells context and, to ensure that local housing needs continue to be met in the plan period. This will in turn ensure that the CDC is able to use the Neighbourhood Plan to engage NPPF §14 in relevant development management decisions for as long as the §14 (or successor) conditions are met.

5.4 During the creation of the Neighbourhood Plan in 2022, CDC consulted on Issues & Options for the partial review of the Plan. It proposes to maintain the current plan period to 2031 but to update policies in the light of it declaring a Climate Emergency and to encourage thinking about the District to 2040 and beyond. It is too early for this Neighbourhood Plan to take into account draft policy proposals but it is noted that the direction of travel on climate change policies is consistent with that taken by the Neighbourhood Plan.

5.5 An of the general conformity of each policy, and its relationship with emerging policy where relevant, is contained in Table B below.

Table B: Neighbourhood Plan & Development Conformity Summary		
No.	Policy Title & Refs	Commentary
SSNP1	The Stow on the Wold Development Boundary	The policy redefines the Development Boundary of Stow on the Wold as set out in Policy DS2 to accommodate the completion of the surgery development on Mangersbury Road and site allocation of SSNP7. The policy wording is repeated for completeness and so that SSNP1 can operate without dependence on DS2 should the Local Plan lose its weight.
SSNP2	Development in The Swells and the Countryside	The policy seeks to provide certainty for applicants and decisionmakers in clarifying the types of development that are suitable in Upper and Lower Swell respectively based on their settlement character. The policy is consistent with Local Policy DS3 in managing small scale development in villages defined as ‘non-principal settlements’, which do not have defined Development Boundaries. The policy does not alter the ‘non-principal’ status of either settlement, nor sets any precedent for modifying or undermining the strategic intent or meaning of the Development Strategy set out in Local Plan policy DS1. Additionally, the policy is also consistent with Local Plan policies DS4, EN4 and EN5 in managing development outside settlements in the wider natural and historical landscape of the area, which all lies within the Cotswolds AONB.
SSNP3	Housing Mix	This policy has two parts. Firstly, it updates Local Plan policy H2 by setting out the requirement to deliver affordable homes in line with the evolution of national policy since 2018 (notably the launching of the ‘First Homes’ affordable housing as a sale product. Secondly, it defines the baseline proportions of housing types (by size) to meet local needs as a refinement of Local Plan policy H1.
SSNP4	Principal Residence	There is no policy in the Local Plan relating to Principal Residence. However, the evidence base clearly identifies a need to address the adverse effect that the high proportion of second homes in the neighbourhood area has on access to market and affordable homes. As such, the policy seeks to tackle the issue in ensuring that the occupancy of new open market housing is as Principal Residency.
SSNP5	Specialist Accommodation for Older People in Stow	The policy intends to tackle the over-supply of age-restricted housing following two major such developments in the last decade, which has led to a noticeable change in the town’s demographic. In doing so, the policy refines Local Plan policy H4 which states that proposals for specialist accommodation for older people will be permitted provided that the development: ‘a. meets a proven need for that type of accommodation’. It is considered that such need has already been met in full over recent years, including the Local Plan period. As noted in Table A, the ‘predict and provide’

		approach is not sustainable in Stow, however, the policy does allow for one or more small schemes for households with a local connection, with a cap of a total of 40 units and/or dwellings over the plan period.
SSNP6	Health and Well Being	The policy encourages proposals to consider health and wellbeing, the environment, and the future impact of climate change in accordance with EN1 and INF3.
SSNP7	Land of North East of Stow	Although the current Local Plan does not require new housing in Stow on the Wold for the plan period, the policy will make a contribution to meeting housing needs in the District. Stow is classified as a Principal settlement in Local Plan policy DS1, and the Local Plan states in that ‘the Development Strategy guides future growth towards 17 Principal Settlements across the District ... selected on the basis of their social and economic sustainability, including accessibility to services and facilities.’ The allocation of approx. 170 homes will represent an increase of approx. 17% in the existing housing stock and, given their type and tenure mix, an increase in the town’s population of more than 20% in an attempt to turn around the 5% decline since 2001. In doing so, the proposal does not undermine the Local Plan Development Strategy of DS1 or the strategy for the town of S13 but instead makes a positive contribution to both. Its proposal to deliver a new business centre is consistent with EC1 in seeking to ‘maintain and enhance the vitality of the rural economy’, to enable opportunities for more sustainable working practices, including home-working, to support and improve the vitality and viability of the town centre and to support sustainable tourism in ways that enables the District to attract higher numbers of longer-stay visitors. It also accords with EC3 in that it lies ‘within the redrawn Development Boundary, where proposals for employment-generating uses on sites that are not currently identified as an established employment site will be permitted in principle’. Any office use of the centre (for the Town Council) will not be of a scale that undermines the town centre and so the proposal generally accords with EC8 as it will be ‘consistent with the strategy for the settlement’ per EC8(4) and consist with the tests of EC8(7). Its enabling of major public realm improvements to the town centre will deliver part of the S13 strategy and the tourism goals of EC10. As addressed elsewhere in the statement, and as detailed in Appendix F of the plan, it is considered the proposal is consistent with AONB provisions of EN5. It has also taken care to establish key development and design principles to ensure the provisions of its design, landscape, heritage and infrastructure policies EN2, EN4, EN7, EN10, EN11, EN12, INF3 and INF7 can be met at the planning application stage. In respect of the new community hub, the proposal accords with INF2(1) as all of the tests of that clause can be met by the scheme in this location, and with the proposed policy wording.
SSNP8	Stow Town Centre & Market Square	The policy complements and partially updates Local Plan policy EC8 to bring it up to date with the NPPF and the 2020 update to the Use Classes Order. The policy is also consistent in its definition of the Stow on the Wold Town

		Centre boundaries as the same area is defined as a ‘Key Centre’ in the Local Plan. Additionally, the Local Plan states 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’, which the policy supports (and Policy SSNP7 enables) providing that it does not hurt the viability of the town centre.
SSNP9	Playing Field Facilities	The policy encourages the improvement of two existing important community facilities in accordance with Local Plan policy INF2.
SSNP10	Local Green Spaces	The policy designates nine Spaces in addition to those designated by EN3 and its wording is consistent with that policy and with the NPPF.
SSNP11	Stow and The Swells Design Code	The policy refines Local Plan policy EN2 and refines and works alongside the Cotswold Design Code by identifying local context and specific design features of the town and two villages in greater detail.
SSNP12	Non Designated Heritage Assets	The policy is consistent with EN12 in seeking to conserve non-designated heritage assets in the Parishes, which are identified on the Policies Map and in Appendix B.
SSNP13	Zero Carbon Buildings	There is no adopted strategic policy on this matter, but this policy is consistent with the Local Plan objectives of ensuring new development is of a sustainable design and maximises energy efficiency and with the broader climate change ambitions of the District Council.
SSNP14	Walking & Cycling in the Town	This policy is consistent with Local Plan Policy INF3 in giving a renewed emphasis to sustainable travel routes in the Parishes.
SSNP15	Vehicle Parking	The policy is consistent with INF5 which sets out the conditions for bringing forward new vehicle parking. Additionally, the Local Plan states 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’, which the policy supports providing that it does not hurt the viability of the town centre.
SSNP16	Digital Infrastructure	The policy is consistent with Local Plan policy INF9 in requiring proposals to not have an adverse impact on heritage assets, the special landscape, or the scenic beauty of the AONB.

5.20 It is considered that all the policies are in general conformity with the strategic policies of the adopted development plan. As a result, the Neighbourhood Plan, as a whole, meets Condition (e).

6. CONDITION (F): COMPATIBILITY WITH EU LEGISLATION

6.1 The requirements in respect of Strategic Environmental Assessment (SEA) have been addressed in Section 4 of this Statement. Suffice to say that the process for preparing the Sustainability Appraisal (incorporated the SEA) and the content of the respective reports has followed the requirements set out in the EU Directive 2001/42 as translated in the UK's Environmental Assessment of Plans & Programmes Regulations 2004.

6.2 The Councils has also met its obligations in relation to the habitat provisions of EU Directive 92/43/EEC (and the associated Conservation of Natural Habitats and Wild Flora and Conservation of Habitats and Species Regulations 2017 (as amended)). In this regard, the Councils provided CDC with all the necessary information it required for the purposes of determining whether an Appropriate Assessment was required or to carry out the Appropriate Assessment if one was required. The CDC's Habitats Regulations Screening Assessment concludes that the making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the 2017 Regulations) either alone or in combination with other plans or projects.

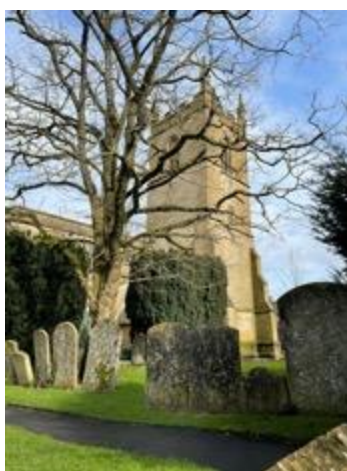
6.3 The Councils has been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights in process of preparing the Neighbourhood Plan and considers that it complies with the Human Rights Act. The Neighbourhood Plan has been subject to extensive engagement with those people local to the area who could be affected by its policies and their views have been taken into account in finalising the Plan.

6.4 In respect of Directive 2008/98/EC – the Waste Framework Directive – the Neighbourhood Plan does not include any policies in relation to the management of waste, nor does the area include a waste management site. On that basis, this Directive is not considered relevant to the Neighbourhood Plan and therefore could not be breached.

STOW ON THE WOLD & THE SWELLS

Neighbourhood *Plan*

2023-2031



CONSULTATION STATEMENT

SEPTEMBER 2023

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Introduction

This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Stow on the Wold and Swells Neighbourhood Plan 2023-2031.

The legal basis of this statement is provided by Section 15 (2) of part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:

- I. Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan.
- II. Explain how they were consulted.
- III. Summarise the main issues and concerns raised by the persons consulted.
- IV. Describe how those issues and concerns have been considered and where relevant addressed in the proposed Neighbourhood Development Plan.

Neighbourhood Plan Consultation

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.

Original Plan

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.

Current Plan

Community Consultation

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.

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. 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.

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.

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.

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 draft Community Design Statement was published in May 2016.

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.

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, Gloucester Rural Community Council 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.

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". 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 February 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 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.

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 Swell Parish Council on 28th September 2017.

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.

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.

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. Responses received 214.

Main issues and concerns raised as a result of non statutory community 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.

Statutory Consultation

The six-week Regulation 14 statutory consultation for Pre-Submission Draft Neighbourhood Plan took place from 6th February to 20th March 2023.

Some bodies must be consulted if a draft Neighbourhood Plan proposed development that could affect their interests. These are known as **statutory consultees** and include the county council, district council, Environment Agency, English Heritage and Natural England. These were consulted, together with neighbouring parish council, the Cotswold National Landscape Board and other agencies and authorities. Responses were received from the following statutory consultees and land interests:

- Gloucestershire County Council
- Cotswold District Council
- Swell Parish Council
- Broadwell Parish Council
- Mangersbury Parish Council
- Oddington Parish Council
- Newlands of Stow
- Cotswold National Landscape Board
- Natural England
- Ward District Councillor Dilys Neill

The wider public must also be consulted, and residents were encouraged to participate with a letter drop to all households in the Neighbourhood Area. The consultation was further publicised with banners placed on Stocks Green in the centre of Stow and on the Shrubbery on the A436 Sheep Street, as well as posters around the Neighbourhood Area, on Council's website and social media. Four drop-in sessions were held, two in Swell parish and two in Stow. Draft plan documents were made available at the drop in sessions and at various locations in the Neighbourhood Area.

The consultation generated significant interest in the town and the surrounding rural areas, most notably in respect of its main housing development proposal to the northeast of the town. The comments highlighted the differences of opinion on the future role and function of Stow, but a large number were submitted by residents of Broadwell village using a template letter. Most do not support the proposed vision, but this runs counter to the views expressed by Stow residents and businesses earlier in the project.

The exercise has served to make such views clearer, now neighbouring settlements have had the opportunity to engage with the project in a more formal way. But it has not led to new factors of technical substance coming to light that would warrant the deletion of that proposal from the submitted Plan.

More generally, the policies have been roundly supported by most or all parties, albeit with suggested improvements to some policies and their justification. Its green infrastructure, heritage, primary residence and zero carbon buildings policies have been especially well supported. It was therefore considered that the Plan could proceed to submission and examination with some modifications made to the text and maps to improve their meaning, to make corrections and to address omissions.

Analysis

Analysis of responses by location and number of points made

The table below provides information on the total number of responses received to the Regulation 14 Consultation. The responses are broken down into the area the respondent indicated they lived and how many comments they made in their response. It does not indicate whether the respondent replied in a positive or negative manner.

Number of respondents - Total	305	
Number of Statutory Consultee responses	10	3.20%
Number of respondents - Stow	108	35.40%
Number of respondents - Swell	18	5.90%
Number of respondents - Broadwell	67	22.00%
Number of respondents - Elsewhere/Unknown	102	33.40%

How many points were made by respondents	0 point	1 point	2 points	3 points	4 points	5 points	6 points	7 points	8 points	9 points	10 points	10+ points	
Number of respondents - Stow	3	19	13	18	16	7	13	8	6	1	0	4	108
Number of respondents - Swell	0	1	1	2	2	3	1	1	2	0	0	5	18
Number of respondents - Broadwell	0	1	4	7	7	11	6	12	14	0	3	2	67
Number of respondents - Elsewhere/Unknown	1	11	13	17	18	21	7	6	5	1	1	1	102

Percentage of respondents inside Neighbourhood Plan Area (Stow on the Wold and Swell Parish)

Stow on the Wold residents and Swell Parish Council residents = 41.3% of the total respondents

Broadwell residents and people from surrounding villages, as well as any anonymous respondents = 55.4% of the total respondents

Analysis of points made by respondents

Category	Comment	Number of responses	Stow	Swell	Broadwell	Other/Unknown
Pro	Pro new car park as long as it is free. Pro new car park but needs to be adequate for all new uses in the development including residents. Car park must be available before the housing is occupied. (SsNP7)	23	19	1	1	3
Pro	Pro Square café culture	7	4		1	2
Pro	Pro Design Code	5	1	2	1	1
Pro	Pro co-working spaces etc (SSNP7)	5	2			3
Pro	Pro affordable housing element	25	18		2	7
Pro	Like principal residence requirement but question enforceability. Unproven elsewhere. New conveyancing document suggested.	25	15	6	1	5
Pro	Pro development (SSNP7)/Neighbourhood Plan.	28	24	1		3
Pro	Pro ban on more old-age housing.	12	6	4	2	

Category	Comment	Number of responses	Stow	Swell	Broadwell	Other/Unknown
	Should be distinction between care homes and retirement homes.					
Pro	Pro zero carbon	1			1	
Size & location of development	General feeling development is too big. Will overwhelm the town. We don't need that many houses. Where are the people going to come from? Too many affordable houses, not needed. Only 37 needed. Small developments of say 6 homes. 70% social rented is too high – would mean importing poor people to Stow. Likely to increase older residents and second homes. Question affordability and lack of social housing. Affordable should be more than 50%. Should be no market housing. Reduce size of development if Bayhill application permitted. (SSNP7)	176	50	12	38	77
Size & location of development	New development should be integrated into the community	1	1			
Size & location of development	Use existing buildings, not build more, e.g. Brio.	12	7	2		3
Size & location of development	Consider Bayhill proposal or smaller brownfield sites. (SSNP7)	18	6		6	6
Traffic	Didn't like the fact it was using the Broadwell turnoff – concerns that Broadwell would become busier from local traffic, also Donnington and Oddington. Narrow and dangerous roads. Not safe for pedestrians. No public transport. Want discussions with Tesco re access. (SSNP7)	69	10	3	38	18
Traffic	Fosseway busy enough as it is, didn't like increase in traffic. Gridlock now. 109%	160	42	10	40	68

Category	Comment	Number of responses	Stow	Swell	Broadwell	Other/ Unknown
	capacity according to a report. Fumes and stationary traffic. (SSNP7)					
Traffic	Estate needs two vehicle entrances. (SSNP7)	2	1		1	
AONB & environment	Not appropriate in AONB. Impact on AONB and the setting and character of Stow. Will spoil Stow's historic charm and turn it into a suburban nightmare. Site considered not suitable in Local Plan. Effects on environment. (SSNP7)	127	25	4	32	66
AONB & environment	Concerned about light pollution and dark skies. (SSNP7)	6				6
AONB & environment	Urban sprawl between Stow and Broadwell not wanted. (SSNP7)	4	2		1	1
AONB & environment	Concerned about loss of green belt, agricultural land, historic hedgerows and trees. (SSNP7)	28	6		13	9
AONB & environment	STOW13 should include rainwater capture	1	1			
AONB & environment	Against Design Code regarding "Suburban".	1			1	
AONB & environment	Concerned about impact of development on the Wells – water supply and visual impact. (SSNP7)	5	3		1	1
AONB & environment	Concerned about impact of development on wildlife. There are badgers on the field. (SSNP7)	1	1			
Infrastructure, flooding	Concerns about overloading the infrastructure, e.g. school, doctors, broadband, water, electricity. (SSNP7)	114	25	4	32	53

Category	Comment	Number of responses	Stow	Swell	Broadwell	Other/Unknown
Infrastructure, flooding	Concerns about overloading the sewage system and where it was going to go to, also rainwater. (SSNP7)	60	5	0	32	23
Infrastructure, flooding	Concerns the development would exacerbate flooding in Broadwell and elsewhere. (SSNP7)	25	0	0	19	6
Infrastructure, flooding	Against cycling provision requirements because cycling is too dangerous here and the requirements are overly burdensome.	5	1	3		1
Infrastructure, flooding	Wants disabled people at heart of plan.	1				1
Level of need	No need for affordable housing in Stow as there is plenty in Moreton, Bourton, Upper Rissington, etc.	16	2		8	5
Level of need	Community facilities including car park not needed. Wrong location for community facilities. Who will pay? Charge for town centre parking and make Mangersbury Road car park free. (SSNP7)	49	17	1	10	21
Level of need	Insufficient decent employment opportunities in Stow for residents of a large development. (SSNP7)	10	2		3	5
Level of need	Lack of employees	2	1			1
Level of need	Stow is too busy already and too focussed on tourism. Stow is not a dying town. (SSNP7)	6	4			2
Parking	Concern that pedestrianisation of the Square would remove too many parking spaces. Square serves residents and surrounding villages. Provision for local residents and short stay parking needed. Free parking essential.	50	12	4	12	24

Category	Comment	Number of responses	Stow	Swell	Broadwell	Other/Unknown
	Concerned about loss of town car park next to Tesco. Death knell for businesses. Local businesses should have a say.					
Parking	Overall parking strategy needed.	7	6			1
Parking	SSNP15 should apply to new business uses too (off street parking requirements).	1				1
Concern	Doubts about delivery of affordable housing and community facilities. Proposals could be altered to benefit developers. If in NP, CDC will have difficulty turning down an application for outline consent. (STOW7)	16	9	3	1	3
Concern	Anti over-zealous zero carbon and EV charging virtue signalling	3		3		
Concern	Concerned about holiday lets and second homes.	5	2	1		2
Concern	Question whether affordable housing will be locally affordable. (STOW7)	11	8			3
Other	Fosseway Farm site should be identified as a Non Designated Heritage Asset	3		3		
Other	Wants a public meeting	1	1			
Other	Object to no more homes for older people.	1	1			
Other	Views of surrounding villages have not been considered.	2			1	1
Other	Only 11% of residents responded to site consultation. (SSNP7)	6	1		5	

Commentary and Response

The representations fall into the following main categories:

- Concerns regarding the size and location of the proposed development, including questioning the need for so many affordable homes and market housing, and questioning the affordability.
- Concerns regarding additional traffic, both on the Fosseway, and through Broadwell village.

- Concerns regarding sewage and flooding from the proposed development.
- Concerns about the effects on the AONB, landscape, and setting and character of Stow.
- Concerns about overwhelming the infrastructure.
- Concerns about loss of parking in the Square and questioning the need for a new car park in the proposed location.

A significant number of representations recognised both positive and negative aspects of the Plan. The comments highlighted the differences of opinion on the future role and function of Stow, but a significant number were submitted by residents of Broadwell village using a template letter. Most do not support the proposed vision, but this runs counter to the views expressed by Stow residents and businesses earlier in the project.

The concerns about infrastructure, traffic, sewage and flooding are recognised but are outside the scope of a Neighbourhood Plan. These issues would be dealt with by the respective authorities as statutory consultees in any planning application process.

Below is a more detailed analysis of the comments received under each Plan policy and the response.

Please note the policy numbering format has been changed from STOW# to SSNP# as recommended by Cotswold District Council.

Policy SSNP1 The Stow on the Wold Development Boundary

Cotswold District Council (CDC) highlights that the policy duplicates Local Plan Policy DS2 and that the site allocation in policy SSNP7 should be drafted within the development boundary to meet the Basic Conditions.

It is considered that the settlement boundary includes the site allocation in policy SSNP7 but its wording remains unmodified. It is noted that many NPs that have deferred to Local Plan wording in the way suggested have been rendered out of date if the Local Plan to which they have deferred has been deemed out of date (as per NPPF §11). To avoid this it is vital that the policy wording of DS2 is replicated in the event that NPPF §14 is engaged in decision making.

Changes made in response:

Policy SSNP1, para 5.6 – The final sentence has been changed to, “The Boundary shown on the Policies Map has been modified to reflect ... the site allocation in Policy SSNP7 in accordance with Local Plan policy DS2”. Policies Map and Insets – The map showing the Development Boundary has been modified to encompass the site allocation in Policy SSNP7 in the Development Boundary.

Policy SSNP1, para 5.7 – The following new sentence has been added: “The wording of policy DS2 is repeated so that Policy SSNP1 can operate independently of DS2 if the weight attributed to that policy is undermined by an out of date Local Plan or a failure by CDC to maintain a sufficient supply of housing land.”

Policy SSNP2 Development in the Swells and the Countryside

Cotswold District Council considers the distinction made in the policy to be inconsistent with Policy DS1 of the Local Plan as “The Local Plan’s development strategy actively avoids listing non-principal settlements, such matters are considered on a case-by-case basis” (our emphasis).

It is considered that the policy should remain unmodified but that some additional explanation is provided in the supporting text. It is not considered there is an inconsistency in the policy stating an observable reality in the different settlement character of the Swells that will enable a clear application of the criteria of DS1 to

proposals in each settlement – in effect resolving any uncertainty of ‘a case-by-case basis’ for applicants and CDC alike. The policy makes no attempt to alter the status of either settlement, nor sets any precedent for modifying or undermining the strategic intent or meaning of DS1.

Changes made in response:

Policy SSNP2, para 5.8 – The following has been added: “For clarity, the policy does not alter the ‘non-principal’ status of either settlement, nor sets any precedent for modifying or undermining the strategic intent or meaning of the Local Plan’s Development Strategy as set out in policy DS1. The purpose of the policy is to provide certainty for applicants and CDC in clarifying the types of development that are suitable in each settlement based on their settlement character.”

Policy SSNP2, para 5.9 – The following has been added (new text in bold): “...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, **which no level of architectural quality could redeem. It does not prevent proposals coming forward seeking to benefit from other clauses in NPPF s80.**”

Policy SSNP3 Housing Mix

CDC, Newlands of Stow and Maugersbury Parish Council advises that the policy should be modified to correct the % provisions in respect of First Homes and offer more flexibility to account for housing allocations of varying housing numbers to which the percentages are not mathematically achievable, and to take into consideration viability, changing circumstances and evidence. The Cotswolds National Landscape Board recommends that the policy proposes 50% affordable housing for housing development of five units or fewer (ideally for two units or more).

It is considered that the supporting text should explain how the policy should be interpreted and applied to clarify that the percentages specified can vary slightly to accommodate housing allocations of varying sizes and to take account of changing circumstances. It is noted that the SSNP area will not likely see a significant scale of change beyond what is planned for now, so it is important these provisions are in place. In that regard there is no indication from land interests that this housing mix will be unviable. It is also considered that no modification should be made to the overall percentage of affordable homes, as the SSNP does not present evidence to support a departure from the 40% provision of strategic policy H2 of the Local Plan, but that the mix should be modified to show: 30% First Homes, 11% other affordable home ownership tenures, 14% affordable rent and 45% social rent.

Changes made in response:

Policy SSNP3: Housing Mix – Clause A is amended to read:

“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 30% of the dwellings (rounded as necessary) as First Homes made available at a minimum 50% discount and at least 15% as other affordable home tenures to be evidenced in a housing need assessment and to be delivered within the scheme. Proposals that seek to maximise opportunities for new open market and affordable homes to be made available to persons with either a local connection to the Neighbourhood Area and its immediate surroundings or persons that are defined as key workers will be especially supported.”

Policy SSNP3, para 5.11 has the following additional text: “Applicants should take into account that report and any later such evidence as circumstances may change during the plan period. Proposals with a number of dwellings that does not break down in whole units against the percentages specified in Clause A and B

may need to adjust the percentages marginally. However, applicants should accommodate the percentages specified in Clause A and B to the furthest extent possible.

Policy SSNP3, para 5.12 has the following additional text: “The policy especially favours proposals that will make provision for key workers (as defined by CDC’s adopted Affordable Housing SPD) and that can show they will appeal to, and be marketed at, local households as part of CDC’s housing allocation process.”

Policy SSNP4 Principal Residence

CDC raises a number of issues with the policy, included that there is a lack of evidence supporting the policy, that Stow as a Principal Settlement should accommodate non-principal residency uses to meet the district housing needs if land were to be allocated for housing and that it would be difficult to enforce action to ensure that the policy is being adhered to. It also sets out other, non-policy approaches to address this issue and provides Council Tax data showing no increase in second homes over the last decade.

The evidence base has been reviewed and more recent Census data searched, with the SEA testing the adverse social effects of leaving the matter to the market. It is considered that this policy can be justified, and it noted that the representations received from the Cotswolds National Landscape Board and a significant number of residents of Stow were supportive of the policy and/or highlighted Second Home ownership as an issue in relation to housing availability and affordability in the town. It is known that the experience of some other LPA areas indicates that this type of policy is signalling sufficient intent to have the desired effect without enforcement action being necessary.

Changes made in response:

Policy SSNP4, para 5.17 has been amended to read:

“The Housing Needs Assessment cited 2011 Census data showing 17% of the housing stock was second homes. The 2021 Census data is not yet available but will only but is likely to show the same problem, combined with the increase in AirBnB-type listings (30-40 no. on average), in line with, or perhaps at an even greater rate, national rates in desirable rural areas like Stow and Swell. With the allocation proposal of SSNP7 creating a generational opportunity to change the town’s housing stock, and alongside the provisions of SSNP4 and SSNP5, its housing supply cannot be undermined by second home ownership.”

Policy SSNP5 Specialist Accommodation for Older People in Stow

CDC and Mangersbury Parish Council suggest that the policy is reworded or expanded to aid its clarity and to ensure its definitions match those of Local Plan policy. It is agreed that the policy and supporting text should be modified to this effect.

Newlands of Stow is promoting a proposal to extend its existing facility on Evesham Road to deliver 25 additional assisted and independent living homes with a rehabilitation suite and other communal and community facilities. It therefore objects to this policy on the basis that it is unnecessarily restricting the supply of specialist accommodation in the plan period and proposes that the SSNP allocates the land at Evesham Road for this purpose.

It is considered that the policy should not be deleted and the land should not be allocated in the SSNP. The objector asserts that the policy is inconsistent with national policy and will not contribute to achieving sustainable development. The rationale for the policy is explained in its supporting text and evidenced in the Housing Needs Assessment report. Whilst national policy does encourage plans to make provision for an aging population, plan makers must also consider how such provision has already been made, especially in

the recent past in a place like Stow. It is considered reasonable for the policy to work in combination with other SSNP policies to favour the correcting of this housing stock balance as a vital part of the town's vision of a wider demographic profile of the town. It is further noted that case law has made clear that the basic conditions must be considered in the light of the SSNP as a whole, and not policy by policy. Irrespective of any merits of the proposal, a new site cannot be allocated in the SSNP at this stage without requiring another Regulation 14 consultation period; it is noted that the scheme being promoted may in any event be consistent with the policy.

Changes made in response:

Policy SSNP5: Specialist Accommodation for Older People in Stow – The policy has been amended to read: "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 affordable housing for households with a local connection; and
- they deliver no more than a total of 40 (C2) units and/or dwellings (C3) of this type over the plan period."

Policy SSNP5, para 5.18 has been amended to read:

"The policy is intended to slow down the supply of age-restricted housing 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 national policy encourages planning for an increasing demand for such accommodation to meet the needs of an aging population, it does not take into account those places like Stow that already have an over-supply and where such an approach will only exacerbate the problem."

Policy SSNP5, para 5.22 has amended to read:

"However, the town has benefited from almshouse-type schemes in its past as a means of providing genuinely low cost housing for people who have a local connection, as defined by CDC. The policy therefore provides an exception for minor schemes – defined as 9 or fewer C2 units and/or C3 dwellings of this type (per the definition of minor development in national policy). However, it requires such proposals to be only almshouse-type schemes for elderly person households relocating from within the Town or Parish or from a Parish that immediately adjoins the Neighbourhood Area. And it caps the total number units and dwellings of this type that are provided to 40 over the plan period to avoid a higher number of incremental proposals whose cumulative effect may otherwise undermine the vision of the Neighbourhood Plan.

Policy SSNP6: Health and Wellbeing

CDC suggests that the policy is reworded or expanded to aid clarity. Additionally, CDC and Cotswolds National Landscape Board recommend that the policy should refer to Natural England's Green Infrastructure Framework. It is agreed that the policy and supporting text are modified to this effect.

Changes made in response:

Policy SSNP6 – the following has been added as a new item in the bulleted list:

"deliver on site Green Infrastructure that meets Building with Nature standards and the principles set out in Natural England's Green Infrastructure Framework as relevant to the nature, scale and location of the proposal"

Policy SSNP6 – new text (shown in bold) has been added to the fifth bullet point as follows:

“for major housing development schemes **as defined by NPPF §177**, include publicly shared outside green, play and allotment space and sympathetic landscaping including appropriate native trees which screen the development from distant views”

Policy SSNP7: Land North East of Stow

CDC has made a number of comments on this policy. They can be summarised:

- The SA/SEA should fully test meeting housing need elsewhere as a ‘reasonable alternative’
- More consideration should be given to a hybrid option of no scheme on this land and some affordable housing being delivered on smaller sites in the SSNP area as well as outside the SSNP area
- The evidence in support of demonstrating the scale of affordable need and the need for new homes, parking and community hub at Stow appears insufficient to support a proposal of this scale
- The hub specification in Appendix C refers to office and retail uses that are not appropriate on a non-town centre site and may generate many short trip car journeys
- The provision of the car park and community hub on the northern boundary of the site is peripheral and may undermine the goal of encouraging their use as a town centre substitute
- There is no evidence to support a scheme coming forward on the SSNP land alone, with no viability dependence on the land outside the SSNP area – the option of redesignating the SSNP area to include at least the land in Broadwell Parish should be explored as a future Local Plan is unlikely to allocate that land
- The landownership and delivery model for the public car park and community hub should be explained
- The requirement for a 20% biodiversity net gain should be evidenced
- Appendix E should incorporate the Cotswold National Landscape Board (CNLB) ‘major development checklist’ to show how the balancing of benefits and harm has been undertaken

The CNLB and a significant number of representations from residents of Stow and nearby parishes object to the policy on the basis of its location on the high wold plateau in the Cotswolds AONB. GCC recommends that the Battlefields Trust is consulted as the location of the Stow Battlefield is uncertain, and if it is located near the site, it could potentially be considered of high significance.

Swells Parish Council has significant reservations – it considers the need for the number of new homes has not been proven, it does not believe that the developer will deliver the proposed benefits and notes that the site has previously been dismissed for allocation by CDC. It supports the need for ‘genuinely’ affordable homes and suggests a smaller affordable housing only scheme on this land, with the other benefits being delivered on alternative sites.

A significant number of representations were received from residents of Broadwell Parish who expressed concern over the potential effects that the proposed development would have on the surrounding landscape and the views from Broadwell Parish. Oddington and Broadwell Parish Councils and a significant number of representations from residents of Stow and the nearby villages have expressed concern for the traffic impact that the site allocation may have on the local road network, and in particular on Fosseyway.

Oddington and Broadwell Parish Councils and a significant number of representations from residents of Stow and nearby villages raised concern that the infrastructure such as schools, health care facilities, drainage and sewerage would not be able to support the proposed additional residential housing. Mangersbury Parish

Council and a number of representations from residents of Stow and nearby villages raised concern that a new community facility is not needed as existing community facilities are underutilised.

The land promoter – Bloor Homes – has confirmed it supports the policy (and other related policies of the SSNP) and considers it will be viable to meet all of its provisions.

This policy was likely to draw most attention from the statutory bodies and the local community during the consultation period. The range and number of comments made have demonstrated this to be the case. Ultimately, however, none have identified issues that were not already known and taken into account in the decision to propose this policy. It was and remains a finely balanced decision, weighing the benefits of new homes (not just affordable), public parking/town centre public realm improvements and a new community hub on the one hand, with the adverse AONB landscape effects on the other.

Clearly, there are many local residents, including those in neighbouring villages, that are only perceiving landscape and traffic downsides of the proposal and are sceptical that any beneficial needs are real or that they will be delivered and have the desired outcome. A number – including CDC itself – have also seen the recent speculative housing proposal made recently by Bayhill on Oddington Road, which has been promoted by the developer as an antidote to the SSNP, as a better option. Some support the principles of improving public car parking capacity and/or the new hub but do not support the scale of housing development necessary for the cost of doing so to be met from private rather than public sources. But most state or imply that they would prefer the town to remain as it is. It is also noted that the vast majority of those objecting to the policy – and many of those using a template response – reside in neighbouring villages and not in Stow.

In respect of the Oddington Road proposal, it is considered this is an attempt to undermine the plan-led system by the land interest, having not secured an allocation in the draft SSNP. Had the location been considered suitable for housing and to deliver the other necessary community benefits then it may have been preferred. But it was not, precisely because of its remote location relative to the town, which ruled it out from being a practical option, and its greater exposed position within the AONB landscape and Conservation Area setting. It is considered the Town Council can make a robust case to CDC that the proposal should be refused as it does not benefit from the Local Plan Policy H3 criteria and would prejudice the making of the SSNP (as per §49/50 of the NPPF).

The position of Swells Parish Council is unfortunate as a partner in the SSNP project. Its reservations about delivery have been thought about and it is considered the need for, and value of, the benefits of the proposal have been well-evidenced by the Town Council over the last few years. Its alternative was explored during the site assessment process, as described in Appendix F of the SSNP. There appears to be no practical or viable alternative to delivering the town's vision across a range of smaller sites without significant public ownership, public funds and/or compulsory purchase, which the Parish Council recognises.

There are technical, process issues that CDC and CNLB have focused on. Essentially, they relate to the evidence base being proportionate but sufficiently robust to support this type of site allocation policy in a neighbourhood plan: are the intended upsides justified by the evidence and have the downsides being properly understood? Both bodies acknowledge the case that has been made and neither has objected to it, although they accept that they would not strike the planning balance in the same way as the Town Council. But both need greater convincing that it be successfully argued at examination, and it is agreed this effort should be made, by working with the land promoter, and with AECOM on the final SA/SEA, to provide as much as possible within the time available.

Inevitably, it remains a political judgement for the Town Council to decide if it wishes to retain this proposal in the SSNP. Its vision of a future sustainable town hinges on the proposal being retained, although a version of the plan without the proposal can proceed to examination, albeit with modifications to the vision,

objectives and some other policies. Its community engagement activities with town residents since 2018 have given it the confidence to pursue this vision and in this specific way, having preferred this site to the Oddington Road option in the 2022 survey. But such activities are rarely conclusive, and statutory consultations like that just completed tend to be used more by objectors than supporters. It remains for the Town Council to judge the likely outcome of a referendum of the SSNP with this policy retained.

In summary it is considered that the policy should be retained but modified as necessary.

Changes made in response:

Policy SSNP7, clause A – the words “residential-led” have been deleted from the first sentence.

Policy SSNP7, Clause A – additional text (shown in bold) has been inserted into the first bullet point as follows:

“A housing scheme of approx. 170 homes comprising approx. 100 open market homes **(of which at least 5 plots should be provided as serviced plots for self-build or custom build homes)** and approx. 70 affordable homes;”

and the bullet points have been re-ordered.

Policy SSNP7 – To correct a typographical error, clauses D to J have been renumbered C to I.

Policy SSNP7, clause C has been amended so that the first sentence reads: “The public car park scheme shall be located within the site in a way that minimises the walking distance to the town centre and that fits well with the layout of the adjoining housing and community hub schemes.”

Policy SSNP7, clause C – the following sentence has been deleted: “It shall be constructed and made available for operation prior to the first occupation of the housing scheme.”

Policy SSNP7, clause D – the following sentence has been deleted: “It shall be constructed and made available for operation prior to the first occupation of the housing scheme.”

Policy SSNP7, clause D – the following text has been added: “The building form, its noise attenuation measures and its hours of operation should be designed in a way that will protect the amenities of nearby residential properties but that will also enable the facility to be accessible and functional to meet a wider range of community needs during the daytime and evenings and on weekdays and weekends.”

Policy SSNP7, clause E – minor change referencing the Parks Estate Character Area in the Design Code.

Policy SSNP7, clause G – The first sentence has been amended to read:

“The transport strategy shall seek to discourage traffic generated by the housing, public car park and community hub schemes from travelling east on Broadwell Lane towards Broadwell village.”

Policy SSNP7, clause I – has been amended to read as follows:

“Proposals should be made in the form of a comprehensive planning application and must include:

- an illustrative masterplan that defines the land uses and sets out the key development principles for access, layout and design;
- a delivery plan setting out how the community hub and public car park schemes and supporting infrastructure will be secured and delivered, with the requirement that a planning obligation is agreed to require both schemes are delivered and available for operation before the final occupation of the housing scheme (excluding the self-build element) at the latest;

- design features that improve energy efficiency and reduce carbon dioxide emissions; and
- a proposal for how the scheme will manage any future identification of any part of the land as having heritage value as a battlefield site.”

Policy SSNP7, para 5.25 – has been amended to read as follows:

“5.25 This policy allocates land on the north-eastern edge of Stow to deliver a new building to support community and business uses and additional public car parking, together with a housing scheme that will enable the delivery of both of those benefits. It is an essential component of delivering the vision for the future success of the town as a package of measures with policies SSNP3 and SSNP4 and a concept masterplan is shown in Plan D below.”

Plan D – Land East of Fosse Way, Draft Indicative Layout (Bloor Homes) has been added on the following page.

Policy SSNP7, para 5.26 – The following sentence has been deleted: “The developer has brought forward the outline proposals to date on the basis that a planning application would be made for all the land should the Neighbourhood Plan be made with this allocation policy.”

SSNP7, para 5.27 – The following additional text has been added (new text in bold): “A small part of the site – its south-western corner – lies within the Conservation Area and **part may also lie within land defined as having heritage interest on the periphery of the site of the Battle of Stow. New evidence to determine the full extent of the battlefield came to light during the consultation on the Plan but the matter remains uncertain (see the Heritage Assessment technical report in the evidence base for more information). This may be resolved by the time a planning application is made to deliver the allocation, for which purpose clause I(4) has been added to the policy.**”

SSNP7, para 5.28 – The following additional text has been added:

“The concept plan shown in Plan D is for illustrative purposes only at this stage; there are a number of different ways in which the scheme components and on-site mitigation measures can be planned and this will be done at the planning application stage.”

SSNP7, para 5.30 – paragraph deleted and the text has been incorporated into para 5.32, see below. SSNP7, paras 5.31 and 5.32 have been renumbered 5.30 and 5.31.

SSNP7, para 5.30 – the following text has been added before the last sentence: “The Town Council is seeking to relocate from its current inadequate facility in the town centre to the building, hence its provision for some office accommodation, and at this scale it is not considered to undermine the ‘town centre first’ principle. Similarly, it is possible that the hub may include a café facility, but this would be ancillary to the main uses of the building and not a separate, standalone facility.

SSNP7, para 5.31 has been deleted and replaced with the following:

“The provision of a new public car park is another essential public benefit justifying the allocation of the land. It will enable the relocation of spaces out of the Market Square (see Policy SSNP8) 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. Its precise location will be proposed in the planning application but the policy requires that it balances securing the most convenient location to encourage walking to the town

centre with accommodating its access from Broadwell Lane in a way that fits with the grain of the final scheme layout.

Policy SSNP7, para 5.32 – new paragraph inserted to read as follows (new text shown in bold, rest of text moved from original para 5.30):

“5.32 The housing scheme serves two purposes. Firstly, it makes the land available from its private owner for the community and car park schemes and the developer will fund the delivery of both schemes. There is no suitable public or other private land available for these purposes and no public funds to deliver them. Secondly, although the current Local Plan requires no new housing supply from the town for the plan period, it will make an important contribution to enabling the ever-aging demographic character of the town 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 SSNP3 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.”

Policy SSNP7, para 34 – new paragraph inserted to read as follows:

“5.34 The policy requires that any planning application that wishes to benefit from its support must be comprehensive in covering all of its elements and must set out precisely how and when the community and parking schemes will be delivered. This reflects the fact that the housing scheme must enable their timely delivery, leaving no prospect that it will be built out and occupied before they are secured and able to operate. This will be done through a planning obligation, which will also secure other elements of the policy, for example its affordable housing. The land interest has confirmed that this approach is reasonable and acceptable and that the project is small enough to be completed in one phase comprising all its elements. In which case, it is not considered neither necessary nor reasonable for the policy to require the delivery of those schemes any earlier than before the housing scheme is completed and occupied.”

Policy SSNP8: Stow Town Centre & Market Square

CDC is supportive of the policy but suggests the Policy Map is made clearer in defining the Town Centre and Market Square. Oddington and Broadwell Parish Councils expressed concern that a reduction of space in the Market Square dedicated to vehicle parking could deter residents of nearby villages to use Stow for services which could damage the commercial viability of those services.

It is agreed that the Policy Map Town Centre Inset should be modified as it does not identify the Market Square area within the Town Centre and is mislabelled. No other modifications are considered necessary. The policy (clause g) requires that the number of vehicle parking spaces lost cannot undermine the commercial viability of the Market Square (though some additional wording to §5.39 could add further explanation). It is noted that a new public car park will be provided by policy SSNP7 which will reduce the need for town centre employees and long stay visitors to rely on parking spaces in the Market Square during the daytime.

Changes made in response:

SSNP8, para 5.39 has been amended as follows. New text is shown in bold.

“5.39 The policy also encourages the use of upper floors by refining Local Plan 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 SSNP7. This responds to the steer of Local Plan Policy S13 to improve the public realm of the Market Square. 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. **The policy requires that number of spaces to be relocated strikes the balance between securing this benefit and maintaining sufficient spaces for visitors/customers of the Market Square shops and services.”**

Policy Map and Insets – The Stow on the Wold Town Centre Inset Map has been amended to show the outline of the Market Square separately within the Town Centre outline.

Policy SSNP9: Playing Field Facilities

Cotswold National Landscape Board supports the policy but recommends that the policy takes into account relevant guidance and standard relating to dark skies and artificial light. It is agreed that the policy and supporting text are modified to this effect.

Changes made in response:

Policy SSNP9, clause A – has been amended to read as follows in order to avoid ambiguity:

“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 the resulting 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.”

Policy SSNP, para 5.40 has been amended as follows to avoid ambiguity:

“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 SSNP10 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 SSNP9, a new paragraph, para 5.41 has been inserted as follows:

“5.41 Proposals need to comply with recognised standards on dark skies including ‘The Reduction of Obtrusive Light’ guidance note published by the Institution of Lighting Professionals and the Dark Skies Technical Advice Note published by the South Downs National Park Authority.”

Subsequent paragraphs have been renumbered.

Policy SSNP10: Local Green Spaces

CDC supports the identification of Local Green Spaces in the Neighbourhood Plan but suggests providing additional, larger scale maps to clarify their boundaries and some additional policy wording. It is agreed that new plans be provided in the main body of the document and the policy is modified as suggested. It is noted that each Space appears clearly defined on the Policy Maps and that the current policy wording matches that of other made NPs, but both can easily be accommodated to resolve these issues.

Changes made in response:

Policy SSNP10 – the last sentence of the policy has been amended to read:

“Inappropriate development within a Local Green Space will only be supported in very special circumstances as defined by national policy.”

Policy SSNP10, para 5.42 (previously 5.41) – the following new sentence has been added at the end:
“They are all owned by one or other public body.”

SSNP10 – Nine maps have been added showing each Local Green Space.

Policy SSNP11: Stow and the Swells Design Code

CDC supports the Code and has suggested some modifications to its content and layout. It is agreed that the Code is modified as suggested, as well as to take account of modifications in relation to Policy SSNP13 (see below).

Changes made in response:

Stow and the Swells Design Code, Introduction – para 1.1 has been amended to read as follows (new text shown in bold):

“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 **the defined Character Areas 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 SSNP11 of the Neighbourhood Plan and Local Plan Policy EN2 of the adopted Cotswold District Local Plan. **The District Code alone applies to proposals located elsewhere in the Neighbourhood Plan Area.**”

Stow and the Swells Design Code, Understanding, Responding to and Applying the Code – para 2.3 has been amended to read as follows (new text shown in bold):

“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. **The Code has not covered every part of the District Code for every Character Area and where this is the case, the District Code alone forms the guidance for development proposals. For example, the District Code sets out the principles for delivering green infrastructure (D66); the Code refines these principles in some Character Areas where this is considered helpful, but not in others.** The term “historic buildings” is used throughout to denote buildings completed before the beginning of the 20th century.”

Stow and the Swells Design Code, Character Area A, Code No D22A – The following text has been deleted:
“Many new buildings are designed in the Cotswold vernacular style and, if done correctly, this follows a great tradition...”

Stow and the Swells Design Code, Character Area A, Code No D41A – The text has been amended to read as follows (new text shown in bold):

“CONTEXT: Although there has been some rendering of walls in the Conservation Area, this does not sit well with the historic Cotswold vernacular unless it is surviving or repaired limewash.
CODING Roughcast or other rendering (other than limewash) are therefore not appropriate finishes for the Conservation Area.”

Stow and the Swells Design Code, Character Area A, Code No D45A – The text has been amended to read as follows (new text shown in bold):

“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 **non-Listed Buildings** should be repaired or replaced **either** with Cotswold Stone tiles **(especially where it is located in the immediate setting of a Listed Building with this same material)** or modern equivalent tiles that are of a similar quality of appearance.”

Stow and the Swells Design Code, Character Area A, Code No D46A – The text has been amended to read as follows (new text shown in bold):

“CODING The use of thatch, clay tiles, **or pantiles or wall hanging with tiles** is not appropriate in the Conservation Area.”

Stow and the Swells Design Code, Character Area A, Code No D50A – The text has been amended to read as follows (new text shown in bold):

“CONTEXT: Almost all historic buildings, including shopfronts, share a palette of **muted** colours for the painting of their windows and doors in the Conservation Area, which complement the subtle tones of the Cotswold Stone of buildings. **Stronger primary colours were more common for shopfronts in Victorian times.**

CODING The use of primary and other, non-polite colours for painting timber is not appropriate in the Conservation Area, **unless for a shopfront.**”

Stow and the Swells Design Code, Character Area A, Code No D67A – The text has been amended to read as follows (new text shown in bold):

“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 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. **“Excessive lighting of signs (such as internally illuminated signs or the use of neon) should be avoided.”**

Stow and the Swells Design Code, Character Area B, Code No D9B & D10B – The second paragraph of the CONTEXT text has been replaced with the following:

“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. However, the Park Estate adopted a material palette and building form as a modern (1950s) interpretation of the Cotswold vernacular and so there is more that binds it visually with the Conservation Area than contrasts with it, which is not true of the St Edwards Road area.”

Stow and the Swells Design Code, Character Area B, Code No D22B & D25B – CONTEXT – The first paragraph has been deleted and a new sentence has been added at the end as follows:

“The St. Edwards area does not have this same character.”

Stow and the Swells Design Code, Character Area B, Code No D22B & D25B – CODING – The text has been amended to read as follows:

“Proposals in the Park Estate should adopt the Cotswold vernacular style. Those in the St. Edwards area should follow the vernacular in their domestic scale and form, but may use other materials common to the area.”

Stow and the Swells Design Code, Character Area C – The section title has been changed to “Character Area C: Stow on the Wold: N Edge of Town Centre”

Stow and the Swells Design Code, Character Area C – Code No D34C – the following text has been added to the end of the CONTEXT section:

“There has been some use of contemporary design and/or materials in new and altered buildings in the Character Area, in part to achieve higher standards of energy performance”

Stow and the Swells Design Code, Character Area C – Code No D34C – the CODING section text has been deleted and replaced with the following:

“Proposals for a new building or for the modification to an existing building to deliver improved energy and other sustainability performance should not be located prominently in the streetscene and should not harm any historical character of the building.”

Policy SSNP12: Buildings of Local Importance

3.32 CDC advises that the policy may not have sufficient regard of the NPPF as it makes no balance with the public benefit of any proposal. It is considered that the policy wording should be modified to precisely match the wording of the NPPF as it is agreed there is some inconsistency.

Changes made in response:

SSNP12 – The term “Buildings of Local Importance” has been replaced by “Non-designated Heritage Assets”.

SSNP12 – The policy has been amended to read as follows:

“Proposals that may affect a non-designated heritage asset (listed in Appendix B) should take into account the significance of its heritage value and must demonstrate how any harm to, or loss of, that significance is outweighed by its benefits.”

Policy SSNP13: Zero Carbon Buildings

CDC considers the policy is unreasonable in that it applies to all development and that there are conflicts with the policy and policy SSNP11 ‘Stow and the Swells Design Code’, and that the policy could be in conflict with the Conservation Areas. CDC also raises questions regarding the definition of ‘zero carbon ready’ and if there are any examples of policy clause B working in practice.

It is considered that the policy should remain unmodified. CDC is one of many LPAs that have declared a ‘climate emergency’. The development planned for in the NP will likely be the most significant for very many years to come in Stow. As Appendix D to the NP explains, requiring new homes to meet at least the highest standard of energy performance the planning system presently allows, and to show that they have actually been built to meet that standard by using a Post Occupancy Evaluation Report, is arguably the most important direct contribution the NP can make to tackling that ‘emergency’. Measuring any performance gap in a meaningful way can only be done once buildings are occupied, not just constructed. Home occupiers will be notified of this obligation at the time of purchase or rent so they will know that they must allow access to the property for an assessment to be carried out.

There is no rationale for applying the policy to only certain types of building in certain locations. There is no inherent design conflict between achieving required energy efficiency standards and the historic environment, nor even in a proposal adopting a PassivHaus or equivalent zero carbon standard. As it is, clause C does not, and for now at least, cannot require that such a standard is met, no matter how important it will be to the UK meeting its carbon reduction obligations.

Instead it seeks to encourage its use and some modifications could be made to the Design Code to reflect how and where design compromises may be possible without harming the significance of heritage assets. This accords with NPPF §206, which specifies that opportunities for new development should be sought within Conservation Areas if they enhance or better reveal their significance. Any development proposals

would need to take that into account, alongside Local Plan policy EN11 which offers further protection to the Conservation Area and its setting.

It is noted that an almost identical version of this policy has been successfully examined in three other neighbourhood plans recently in Buckinghamshire and West Oxfordshire.

Changes made in response:

Policy SSNP13, Clause A – has been amended to read as follows:

“A. All development proposals should be ‘zero carbon ready’ by design as relevant to their nature, scale and location by design so that they will minimise the amount of energy needed to heat and cool buildings by way of their through landform, layout, building orientation, massing and landscaping.”

Policy SSNP13, paras 5.49 and 5.50 (previously 5.48 and 5.49) have been amended and combined to read as follows:

“5.49 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 delivering on the energy performance standards required of all new developments in the area to encourage and thereby incentivise the use of the Passivhaus or equivalent standard of building design. Achieving this level of performance will make a significant contribution to mitigating climate change that the Neighbourhood Plan can deliver.”

Policy SSNP13, para 5.51 has been amended and a new para 5.52 has been inserted as follows:

“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 seeks to tackle a longstanding problem of constructed buildings not meeting the energy performance standard proposed by the builder, which only becomes obvious once the building is occupied. Without a check and balance in the approval system there is currently no means of correcting these failures that are resulting in higher energy bills for occupants and under-performance on meeting carbon reduction targets.

5.52 It therefore requires the developer of a consented housing development scheme of any size to ensure that they have made provision with future occupants to be able to enter properties after the first year of occupation, or thereabouts, to carry out a Post-Occupancy Evaluation (POE), including actual metered energy use, and to submit a report to the local planning authority. It will be implemented by attaching a planning condition to this effect, 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. Although it is accepted that this will increase the post-application resource of CDC, it has declared a climate emergency and this will be one of the most effective ways of this ambition being acted upon. Further guidance on the purpose and operation of clause B is contained in Appendix D of this document.”

Policy SSNP13, clause 5.53 (previously 5.52) has been amended to read as follows:

“5.53 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. Passivhaus certified schemes will not fail in this way and they are therefore exempted from the POE provision of clause B as they cannot fail in that way. Until such standards can be required by planning policy it is hoped that this exemption will be an effective incentive, especially as the build costs of doing so are now only just above those of conventional buildings.”

Policy SSNP14: Walking & Cycling in the Town and Parish

GCC highlights that new proposed development sites, particularly in the Policy SSNP7 proposal, must have suitable safe and appropriate access from the site to the minor highway network to the south for active travel users. The GCC also suggests that it may be beneficial for the Neighbourhood Plan to consider strategic multi-modal connections, such as e-bikes and cycle access to Kingham Rail Station and the National Cycle Network. It is agreed that the policy be modified to include GCC's suggestions.

Changes made in response:

SSNP14 – the following words have been added to the policy: “to the extent the route lies within the Neighbourhood Area”

SSNP14, para 5.60 (previously 5.59) – The following text has been added:

“The policy offers encouragement to realising that goal to the extent that the route lies within the Neighbourhood Area. Strategic multi-modal connections would also be supported, such as provisions for cycle access to Kingham Rail Station and the National Cycle Network.”

Policy SSNP15: Vehicle Parking

No comments of substance were made on this policy.

Policy SSNP16: Digital Infrastructure

CDC's representation sets out that the policy is inconsistent with national policy and Local Plan policy EN5. The Parish Councils obtained clarification from CDC as to how the policy is inconsistent with national policy and Local Plan policy EN5 and agreed the policy should be modified in line with that, and also in accordance with CNLB's recommendations.

The policy is in accordance with NPPF § 114 which states that ‘Advanced high quality and reliable communications infrastructure is essential for economic growth and well-being’ and sets out that proposals should not cause substantial harm to the Cotswolds AONB. As per NPPF paragraph 202 if a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal which the policy is in support of, and it is considered the policy should be modified to make that clear.

Additionally, proposals will need to take Local Plan policy EN5 into account which states that ‘the conservation and enhancement of the natural beauty of the landscape, its character and special qualities will be given great weight’. The representation from the CNLB supports the policy in principle but suggested that the policy required new digital infrastructure to be sensitively located and designed to avoid and minimise potential adverse effects on the natural beauty of the Cotswolds.

Changes made in response:

Policy SSNP16 has been reworded to read as follows:

“The public benefit of improving access to digital communication infrastructure in the area will be significant weight in the planning balance of proposals that may cause harm to designated heritage assets or to the special landscape and scenic beauty of the Area of Outstanding Natural Beauty. Proposals are required to be sensitively located and designed in order to avoid or minimise potential adverse effects on the natural beauty of the Cotswolds National Landscape, including its landscape and scenic beauty.”

SSNP16, para 5.663 (previously 5.62) has been reworded to read as follows:

“This policy seeks to encourage the provision of new digital communications infrastructure that will drive technological advancements necessary to support new businesses and homes. This infrastructure includes the installation of new transmitters, antennas, junction boxes and satellite dishes. 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 significant weight is attached to the public benefit of having access to this infrastructure when weighed against any harm to heritage and landscape in the planning balance of each proposal.”

Appendix 1:
Poster and banner used for Regulation 14 consultation publicity



HAVE YOUR SAY

NEIGHBOURHOOD PLAN
REGULATION 14
PUBLIC CONSULTATION

6 FEBRUARY – 20 MARCH 2023

DON'T MISS YOUR OPPORTUNITY TO COMMENT
CLOSING DATE 20TH MARCH

VIEW DRAFT PLAN AT
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Printed copies available to view:
Stow Town Council office | Stow Library | Swell Village Hall

Drop-in sessions
Tues 21 st February – St Edward's Hall, 2.00pm-8.00pm
Wed 22 nd February – Swell Village Hall, 11.30am-1.00pm
Sat 25 th February – Swell Village Hall, 2.00pm-5.00pm
Sat 4 th March – Stow Social Club, 10.30am-5.00pm

STOW ON THE WOLD & THE SWELLS
Neighbourhood
Plan

STOW ON THE WOLD & THE SWELLS
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PUBLIC CONSULTATION

Have your say on the draft Neighbourhood Plan
www.stowonthewold-tc.gov.uk/neighbourhood-plan/
Drop-in sessions available – see posters and website

Consultation open from 6th February to 20th March 2023

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Strategic Environmental and Habitats Regulations Assessment

Screening Report Stow-on-the-Wold and Swell Neighbourhood Plan

October 2020

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Introduction

- 1.1 This screening report is designed to determine whether or not the content of the Stow-on-the-Wold (referred to as Stow) and Swell Neighbourhood Plan (Latest available public version Draft version 12 - 28/9/17) https://stowonthewoldtc.gov.uk/files/neighbourhood_plan_01_draft_neighbourhood_development_plan_version_12.pdf requires a Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC. It also includes an assessment of whether a Habitats Regulation Assessment (HRA) in accordance with Article 6(3) and (4) of the Habitats Directive 92/43/EEC would be required. Under EU regulations the legal requirement for SEA/HRA depends on the content of the plan.



- 1.2 Please note, **a Scoping Report has already been produced for the draft NDP in 2017. This report is for completeness**, to acknowledge recent changes to the latest version of the NDP, and to formally note the reasons behind that request.
- 1.3 The Stow and Swell Neighbourhood Plan is being prepared, to set out the vision for the area and the planning policies for use and development of land within the Neighbourhood area.
- 1.4 The area covered by the NDP includes both Parishes of the town of Stow on the Wold and the rural Parish of Swell, including the villages of Upper Swell and Lower Swell. Stow is identified in the Local Plan as a 'Principal Settlement' and is located on a prominent hilltop setting, (the NDP area is) wholly within the Cotswold Area of Outstanding Natural Beauty (AONB).
- 1.5 The Neighbourhood Plan is being prepared in the context of the Cotswold District Local Plan 2011-2031. The Local Plan was adopted by the Council in August 2018 having been through Independent Examination. The Local Plan (Policy S13) supports in principle development of a Town Museum and a new community facility and small local workshops/B1 uses in the town (Local Plan, 7.15) but does not directly allocate land within the NDP area. The Development Plan for the area will comprise both the Cotswold District Local Plan and (when 'made') the Stow and Swell Neighbourhood Plan, and will be used to help determine planning applications and appeals.
- 1.6 The Vision for Stow and Swell is based on key issues raised by local people and includes; goals to conserve and enhance the environment, ensuring an adequate supply of affordable housing to meet the community's needs, developing the economy, and ensuring an appropriate infrastructure (including green infrastructure) of services, facilities, and additional parking sites.
- 1.7 **The latest version of the Plan (draft version 13 - 2020) supports more development with more possible sites than previously suggested in version 12 (above Draft version 12 - 28/9/17) and is now proposing in the region of some 150 dwellings.**
- 1.8 The Plan supports development (and the potential allocation) of sites and also provides local guidance on how applications for development in the plan area should be determined.
- 1.9 The legislation set out below outlines the regulations that require the need for a screening exercise.

Legislative Background

- 2.1.1 Establishing whether a neighbourhood plan requires an environmental assessment is an important legal requirement and forms part of the neighbourhood planning process.
- 2.2 In order to be 'made' neighbourhood plans are required to be tested against and meet a number of 'basic conditions' set out in the Localism Act 2011 (Appendix 1). One of the basic conditions is whether the Neighbourhood Plan is compatible with European Union obligations, including those under the SEA Directive and Habitats Directive. Neighbourhood Plans in England require SEA if their effects are likely to be significant, or if the plan requires appropriate assessment under Habitats Regulations Assessment (HRA). While screening for SEA and HRA is a parallel process both are integrated here into one report.

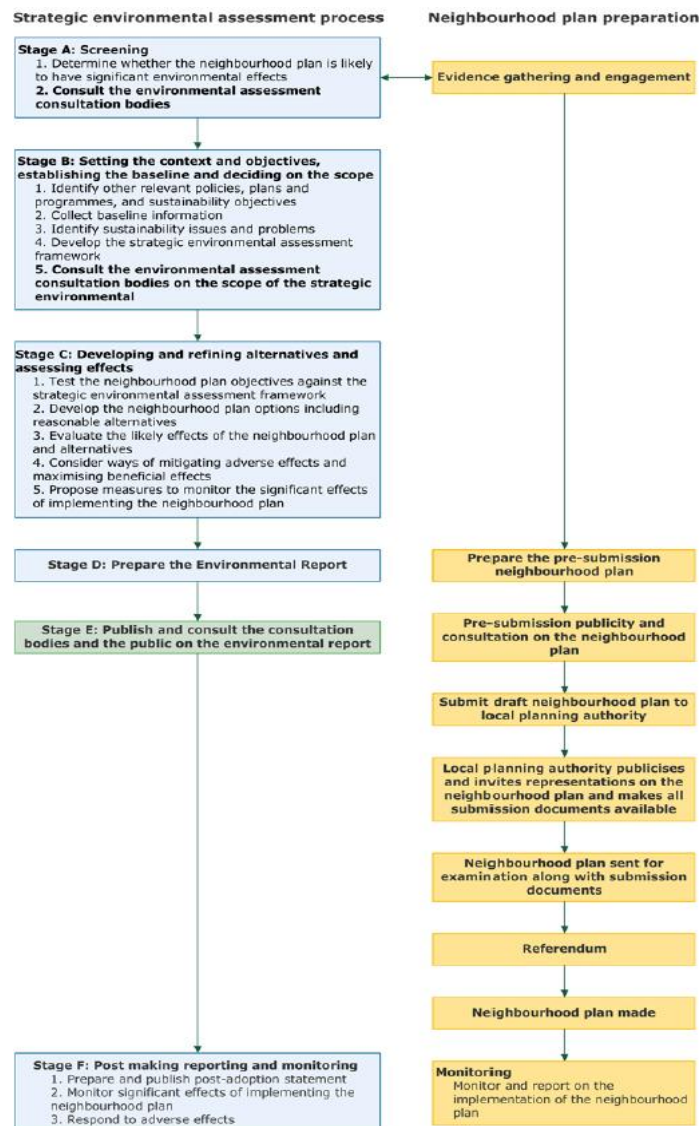


- 2.3 Neighbourhood Development Plans (NDPs) are not required to undertake the type of sustainability appraisal required for a Local Plan. However NDPs may require a strategic environmental assessment (SEA) of the Plan in accordance with European Directive 2001/42/EC or '**SEA Directive**'. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 or the 'SEA Regulations'. Regulation 9 sets out the requirements to assess (screen) the plan, and includes a requirement to consult the environmental assessment consultation bodies.
- 2.4 The Local Plan was subject to a full, comprehensive Sustainability Appraisal (SA) including SEA, which has considered the significant environmental, economic and social effects of the Local Plan for the District. A neighbourhood plan might require SEA if it is likely to have significant environmental effects that have not already been considered and dealt with through a SA of the Local Plan. The SA Report that accompanied the Local Plan to Examination can be found here: <https://www.cotswold.gov.uk/media/pf4dif24/8101-sustainability-appraisal-jan-2017.pdf>
- 2.5 While the Neighbourhood Plan is likely to focus on more local detail than the Local Plan, The Planning Inspector stated in his report that he was '*...satisfied that the sustainability appraisal that has been carried out throughout the process of preparing the Plan, as required by section 19(5) of the Act, has complied with the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance*'. 1 (Para.24, Cotswold District Local Plan 2011-2031: Inspector's Report June 2018).
- 2.6 The **Habitats Directive** 92/43/EEC is another key obligation and requires that any plan or project likely to have a significant effect on a European Site must be subject to an 'appropriate assessment,' rather than just screening. The effectiveness of measures to mitigate the impact of the plan, on sites protected by the Habitats Directive, should also be tested through full appropriate assessment, rather than just screening (EU Court of Justice ruling in *People Over Wind and Sweetman v Coillte Teoranta*, April 2018).
- 2.7 The Habitats Directive was transposed into English law by the 'Conservation of Habitats and Species Regulations (as amended) 2012' or 'Habitats Regulations'. HRA is the screening assessment (Reg 106(1)) of the likely effects, or impacts, of a land use proposal against the conservation objectives of European sites; and considers whether or not a proposal (alone or in combination) is likely to be significant. European Sites are also known as Natura 2000 sites. The HRA submitted alongside the Local Plan to Examination can be found here: <https://www.cotswold.gov.uk/media/fcolqyq3/5501-habitats-regulations-assessment-report-apr-2017.pdf>

Screening Process

- 2.8 Screening is 'Stage A' of the SEA process outlined in the Governments' National Planning Practice Guidance (NPPG), and should be undertaken as early as possible in the neighbourhood plan process. The NPPG also provides guidance on when an SEA might be required.

¹ <https://www.cotswold.gov.uk/media/1605407/Cotswold-Local-Plan-Report-Final.pdf>



- 3 Where the Neighbourhood Plan falls within the scope of the SEA Regulations (see ‘Assessment – Is an SEA required?’) a determination under Regulation 9 is required (see ‘Assessment – Likely significant effects?’). Regulation 9 requires that the responsible authority shall determine whether or not a plan is likely to have significant effects and
 - a) take into account the criteria specified in Schedule 1 to the SEA Regulations and
 - b) consult the consultation bodies.
- 3.1 Where a Neighbourhood Plan is likely to have a significant effect on the environment an SEA (environmental report) must be carried out; and where the plan is unlikely to do so, and does not require an SEA, there should be a statement of reasons for the determination.
- 3.2 The criteria to decide whether a neighbourhood plan, might have significant environmental effects is set out in Schedule 1 of the Regulations (Annex II of ODPM Guidance) below.

ANNEX II

Criteria for determining the likely significance of effects referred to in Article 3(5)

1. The characteristics of plans and programmes, having regard, in particular, to
 - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
 - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
 - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
 - environmental problems relevant to the plan or programme,
 - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
 - the probability, duration, frequency and reversibility of the effects,
 - the cumulative nature of the effects,
 - the transboundary nature of the effects,
 - the risks to human health or the environment (e.g. due to accidents),
 - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage,
 - exceeded environmental quality standards or limit values,
 - intensive land-use,
 - the effects on areas or landscapes which have a recognised national, Community or international protection status.
-
- 1.1 An SEA would also be necessary if the plan requires appropriate assessment under **Habitats Regulations Assessment**. The overall purpose of a HRA is to conclude whether or not a proposal or policy or whole Plan would adversely affect the integrity of the site in question.
 - 3.3 Screening is 'Stage 1' of the HRA process, followed, if necessary, by an Appropriate Assessment. Under the Habitats Regulation 106 an assessment of the 'likely significant effects' of the Plan is the first step to be required. Where a doubt remains an adverse impact should be assumed – HRA's are thus based on the precautionary principle.
 - 3.4 The first step is to consider which European site or sites could be affected by the Plan. Then consider the policies within the NDP and screen using assumptions from the Local Plan HRA, both in relation to *how* likely significant effects may result from the NDP, and on a *proximity* basis, on how far such impacts may travel; looking at physical damage, pollution, recreational pressure, water quantity and quality.
 - 3.5 The Inspector needs to be satisfied that the SEA/HRA work properly demonstrates the making of the Plan would not have any significant effects and therefore satisfies the basic condition on compatibility with EU Regulations.
 - 3.6 '*Assessment of the effects should be done in a proportionate way...*' (Screening NDPs for SEA, Locality, page 10), and although there may be some gaps in information, there should be enough to assess the likely significant effects of the plan.
 - 3.7 A screening outcome for both SEA and HRA is provided in the conclusion.



Assessment – Gathering Data

- 3.8 Once data on the environmental constraints and assets in the area have been gathered, it is then possible to determine any likely significant effects of the NDP proposals (positive and /or negative) on the environment.
- 3.9 The potential environmental effects which may arise as a result of the NDP and if they are likely to be significant, are grouped by the SEA ‘topics’ as suggested by Annex I(f) of the SEA Directive.

Annex I (f) of the SEA Directive – environmental receptors (physical and cultural attributes of an area) which could be affected by proposals in the plan. Grouped into themes:

(f) the likely significant effects (1) 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;

- 3.10 The Plan vision and objectives, or draft proposals, and a list of sites considered for inclusion in the plan (if any) and potential impact of new development will help determine whether or not the plan would give rise to significant effects.
- 3.11 The following section provides a screening assessment of the likely need for a full SEA. The text in the box below is taken from the Government’s Planning Practice Guidance (NPPG)² on when an SEA may be required:

Whether a neighbourhood plan proposal requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed. A strategic environmental assessment may be required, for example, where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan

Paragraph: 046 Reference ID: 11-046-20150209

Will the neighbourhood plan allocate sites for development?

- 3.12 It is understood that it is the intention of the plan to allocate sites for development. Policy H1 seeks to satisfy the need for ‘at least 27 affordable houses’, with the majority most likely

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#baseline-environmental-characteristics>

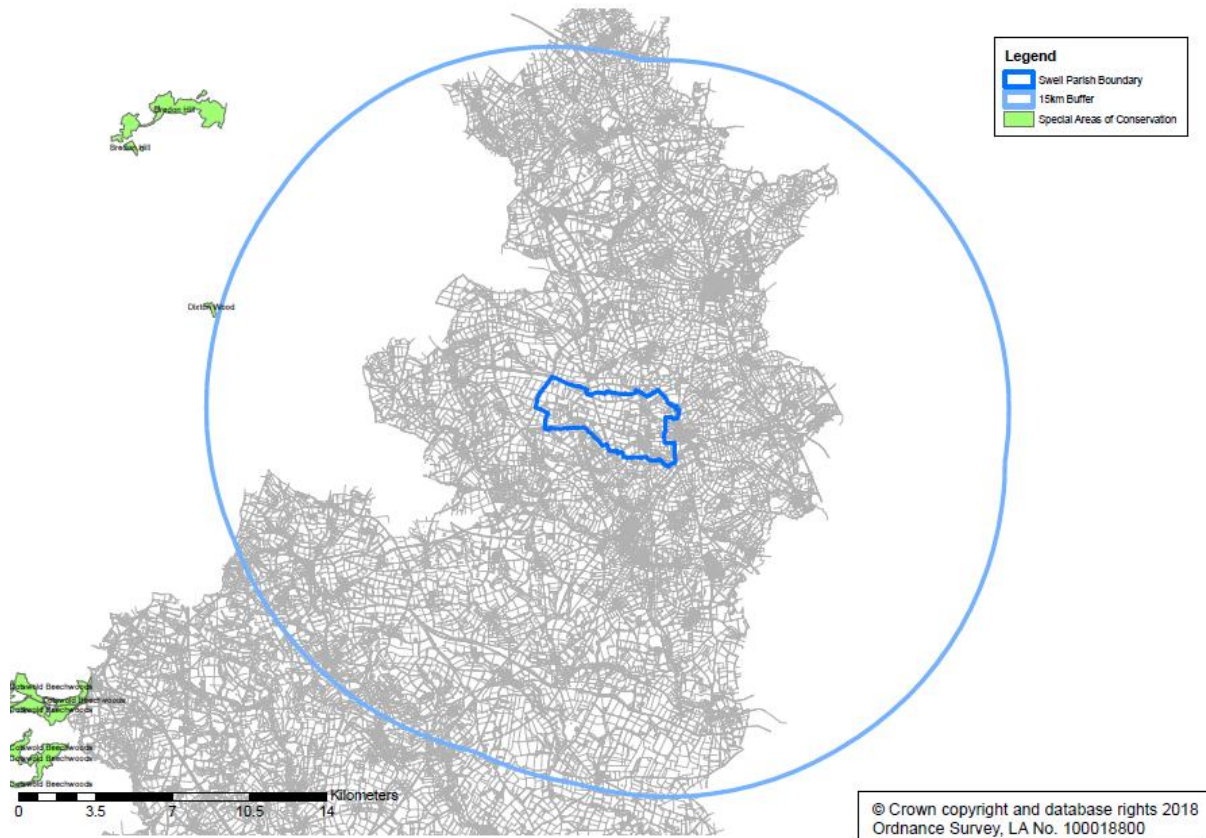
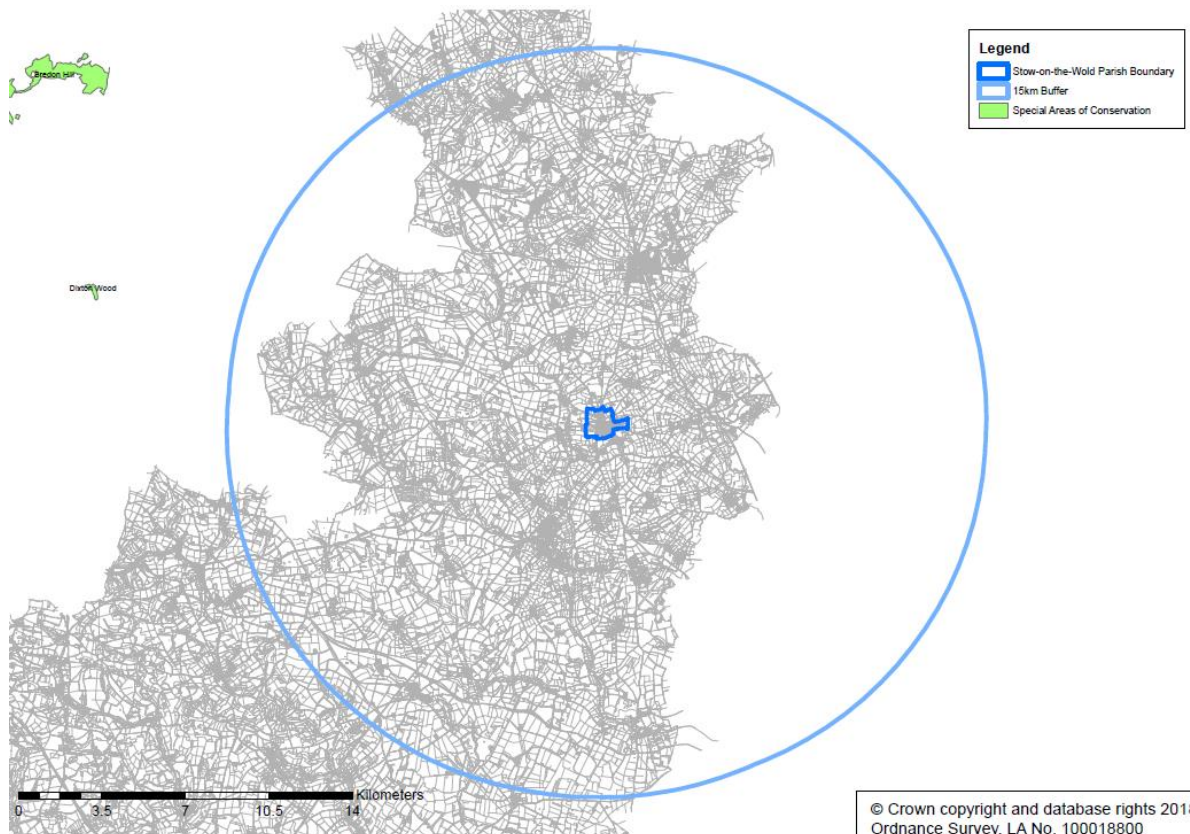


to be sought on the Town Council allotment site; and also several additional parking sites. The current Local Plan does not allocate sites at Stow.

Does the neighbourhood area contain sensitive natural or heritage assets that may be affected by the proposals in the plan?

- 3.13 The more environmentally sensitive a location, the more likely it is that potential environmental effects from a plan will be significant.
- 3.14 The NPPG provides guidance on this topic through providing a list of sites and area which should be deemed as '**sensitive areas**' for the purposes of environmental assessment (i.e. screening projects for Environmental Impact Assessment or EIA):
- ◆ Natura 2000 Sites ³
 - ◆ Sites of special scientific interest (SSSIs)
 - ◆ National parks
 - ◆ Areas of Outstanding Natural Beauty (AONB)
 - ◆ World Heritage Sites
 - ◆ Scheduled Monuments
- 3.15 The European designated 'Natura 2000' sites are included within an area of search of 15km for HRA purposes. The plan below shows those Natura sites within 15km of the neighbourhood plan boundary.
- 3.16 Notably, the nearest SACs lie to the west beyond the 15km area of search; the closest is Bredon Hill to the North West (18.5km), with Cotswold Beechwoods, and Rodborough Common SACs further to the south west.

³Natura 2000 is a network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive



3.17 In the context of the most ‘**sensitive areas**,’ within and in the vicinity⁴ of the Neighbourhood Area, (see figures 1 and 2) the following sites and areas exist:

- Cotswold Area of Outstanding Natural Beauty (AONB) washes over the Plan area
- there are 16 scheduled monument (SAM) designations within the NDP including:
 - Stow Camp - pre-historic enclosure, Stow-on-the-Wold
 - Market Cross – Stow on the Wold
 - Romano-British Villa near Abbotswood (Swell Parish)
 - Roman and medieval settlement remains adjacent to north east of Lower Swell
 - Poleswood East long barrow, approx. 850m NNW of Lower Swell
 - Poleswood South long barrow, approx. 950m NW of Lower Swell
 - The Tump (two bowl barrows) approx. 800m west of Lower Swell
 - Lower Swell long barrow 400m NW of Lower Swell
 - Several other SAMs lie to the west of the Roman Road, west of Lower Swell some 2.5km away.
- Sites of Special Scientific Interest (SSSI's):
 - New Park Quarry SSSI lies beyond the Parish boundary to the north some 481 metres away.
 - Huntsman's Quarry lies beyond the Parish boundary to the south west some 514 metres away.
 - Barton Bushes, and Lark Wood SSSI's lie further to the west some 2km away.

3.18 Further **key environmental assets** (see Locality guidance on Screening Neighbourhood Plans for SEA) located within, and in the vicinity of, (see figures 3 and 4) the area include;

- Conservation Areas lie within all three NDP settlements; Stow (extends into Maugersbury), Lower Swell and Upper Swell
- There are Listed Buildings within all three NDP settlements, approx. 170 in the area.
- Agricultural land⁵ classification is Grade 3b, some Grade 3a and Grade 2 to far west of NDP area
- Two areas of ancient woodland (Slate-pit Coppice and Slaughter wood (north)) lie adjacent to the southern NDP boundary
- Priority habitats; areas of good quality semi-improved grassland to the south of Lower Swell, and a linear area of lowland calcareous grassland to the north west of Upper Swell. Areas of woodland, deciduous woodland and broadleaved woodland, plus woodpasture and parkland mainly to the west of Stow.
- Registered Park and Garden, Abbotswood, between Lower Swell and Stow
- Registered Battlefield (Battle of Stow) adjacent a small area of the boundary with Swell to the north of Upper Swell.

⁴ To determine whether the effects of the plan are likely to affect areas outside the plan area, i.e. define ‘within the vicinity’ an indicative threshold of 1km has been used [Screening Neighbourhood Plans for SEA, Locality, p.12]. Designations beyond this area however are also considered

⁵ Agricultural land is classified in five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as ‘Best and Most Versatile’ land.

- The Plan also contains part of the Arkells Banks Key Wildlife Sites⁶ (KWS) which lies north-south in the northern edge of the NDP area, the Dikler Valley Meadows KWS to the south, and abuts the tip of Eyford Park KWS to the south.
- Swell Wold Quarry is a Regionally Important Geological site (RIGs)⁷
- A strategic nature area (SNA⁸) lies in part across the west and north edge of the NDP area

Figure 1

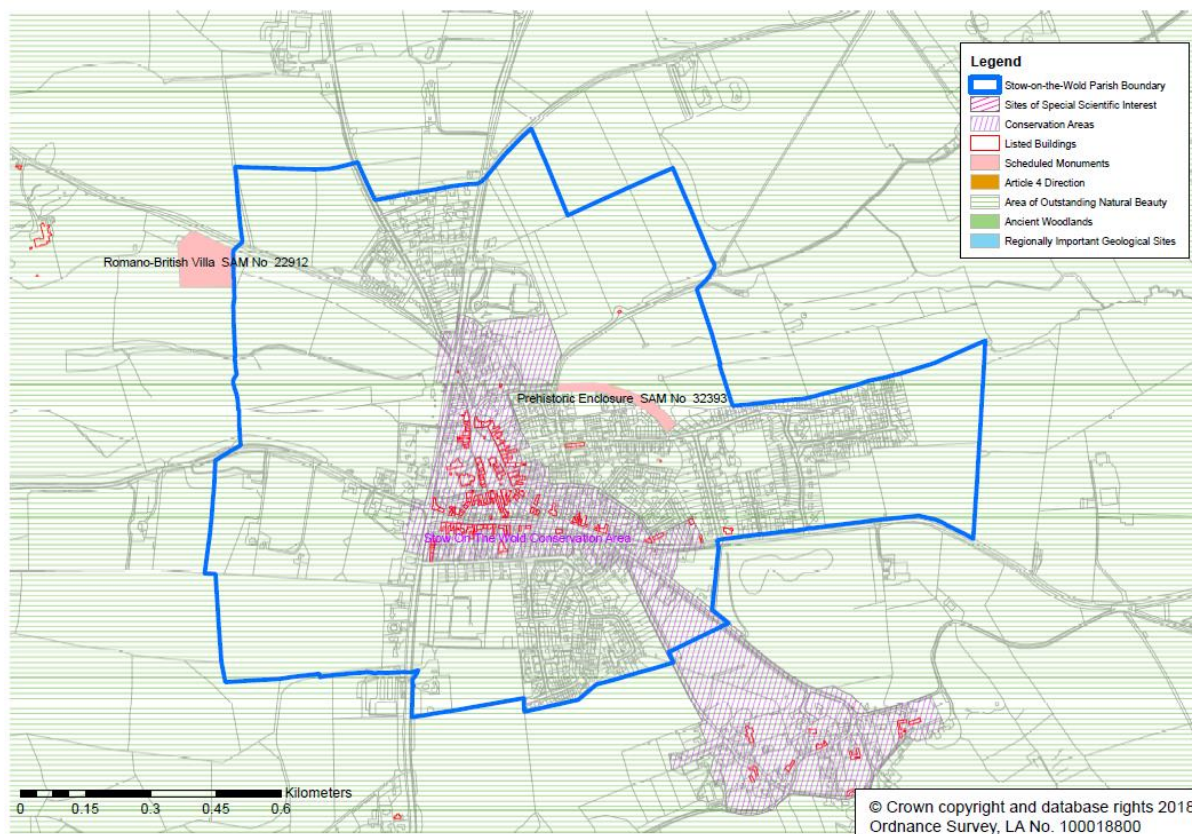


Figure 2

⁶ Key Wildlife Sites are areas with a rich diversity of habitats that provide refuges and corridors for wildlife across Gloucestershire. These sites have no legal protection, yet deserve recognition as the most important places for wildlife outside of legally protected land such as Sites of Special Scientific Interest (SSSI). A KWS designation does not necessarily include public access and boundaries are open to review.

⁷ Regionally Important Geological and Geomorphological Sites (RIGS) are locally designated sites of local, national and regional importance for geodiversity (geology and geomorphology) are considered important places for Earth Science which are worthy of conservation.

⁸ Strategic Nature Areas (SNAs) are landscape scale areas of land that have been selected by Biodiversity South West as being important areas for conservation and expansion, they are not designated.

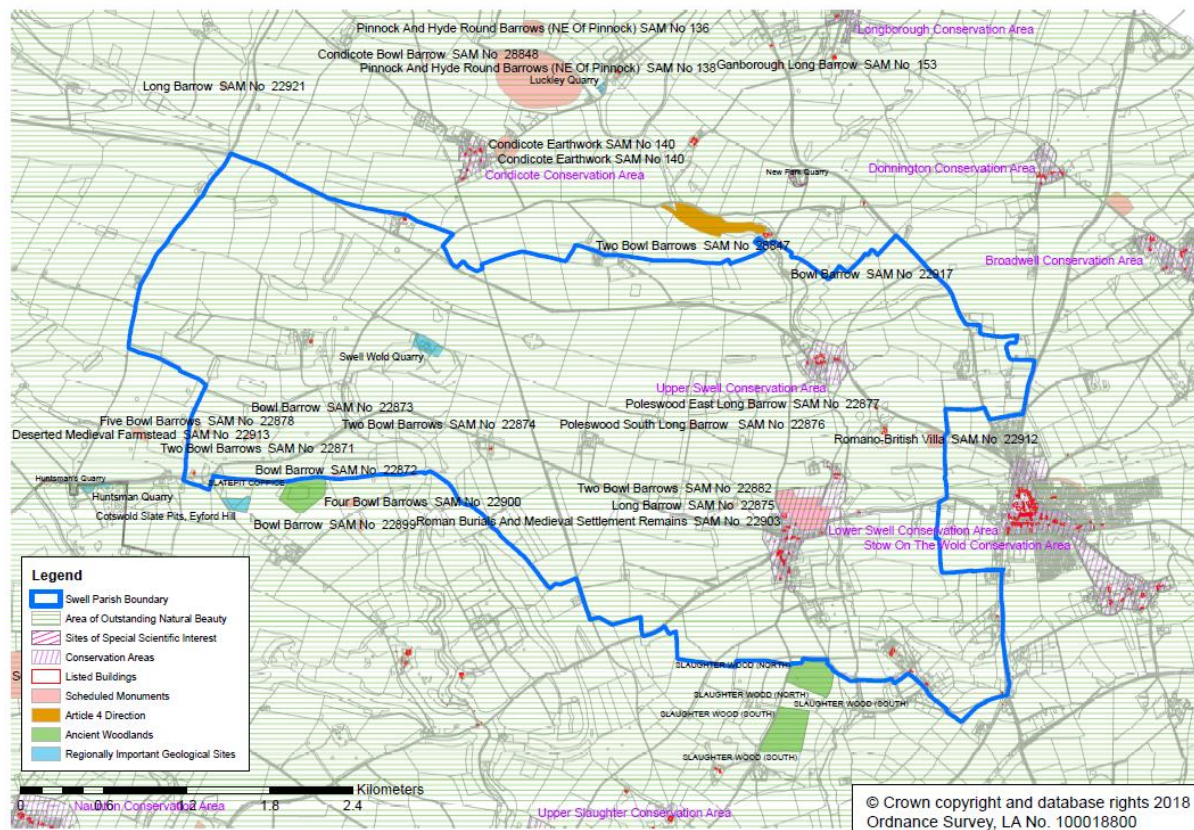


Figure 3

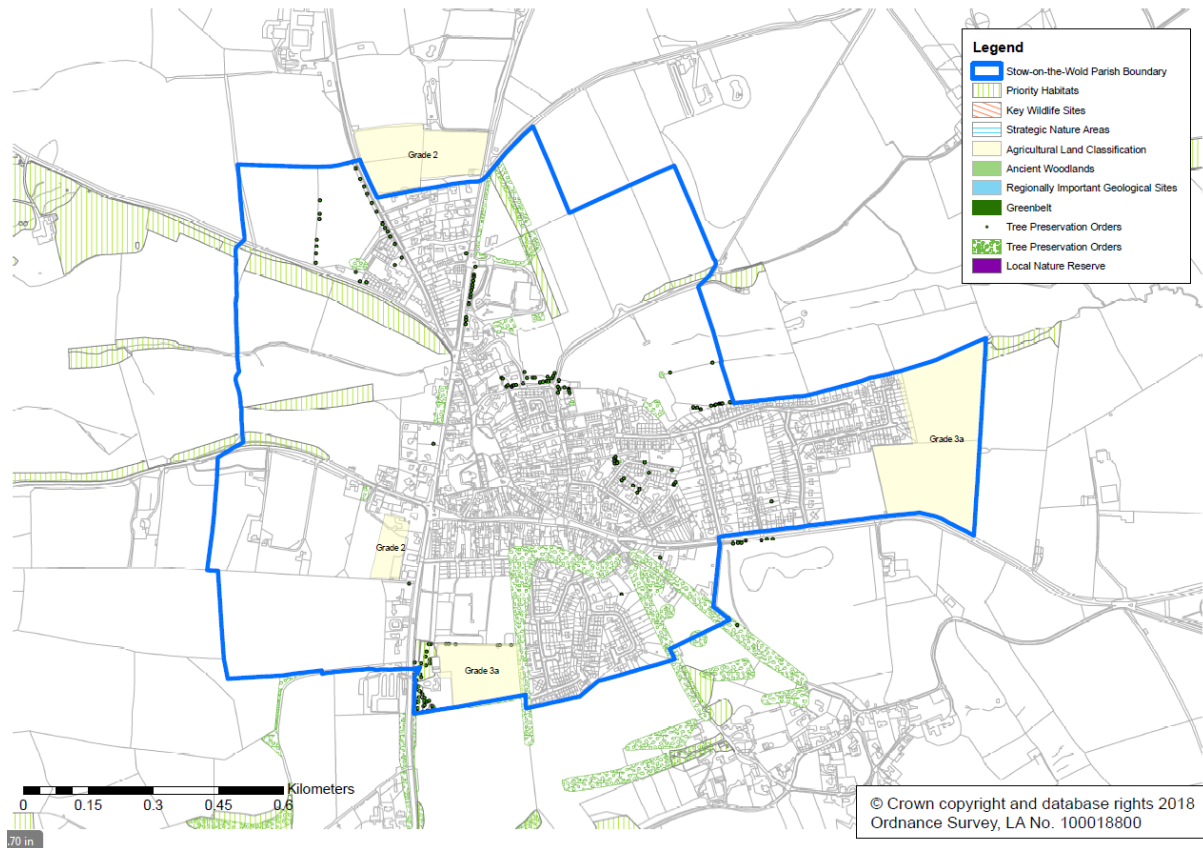
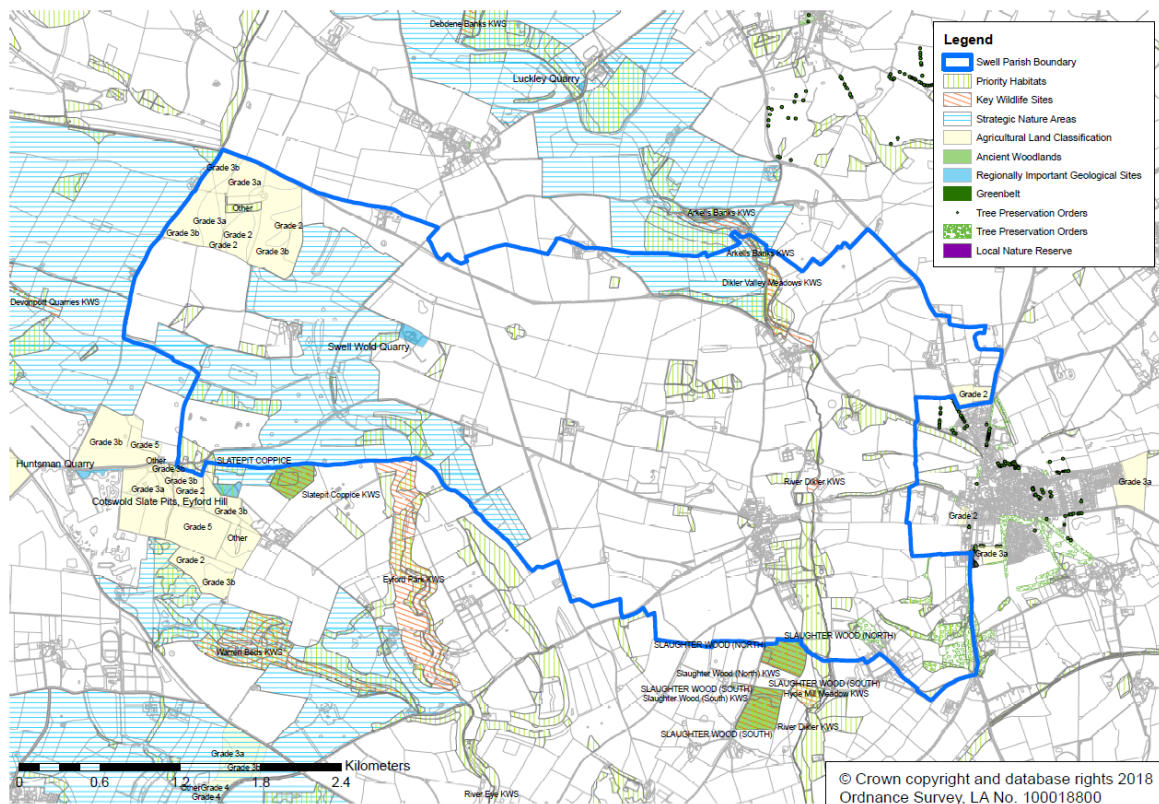
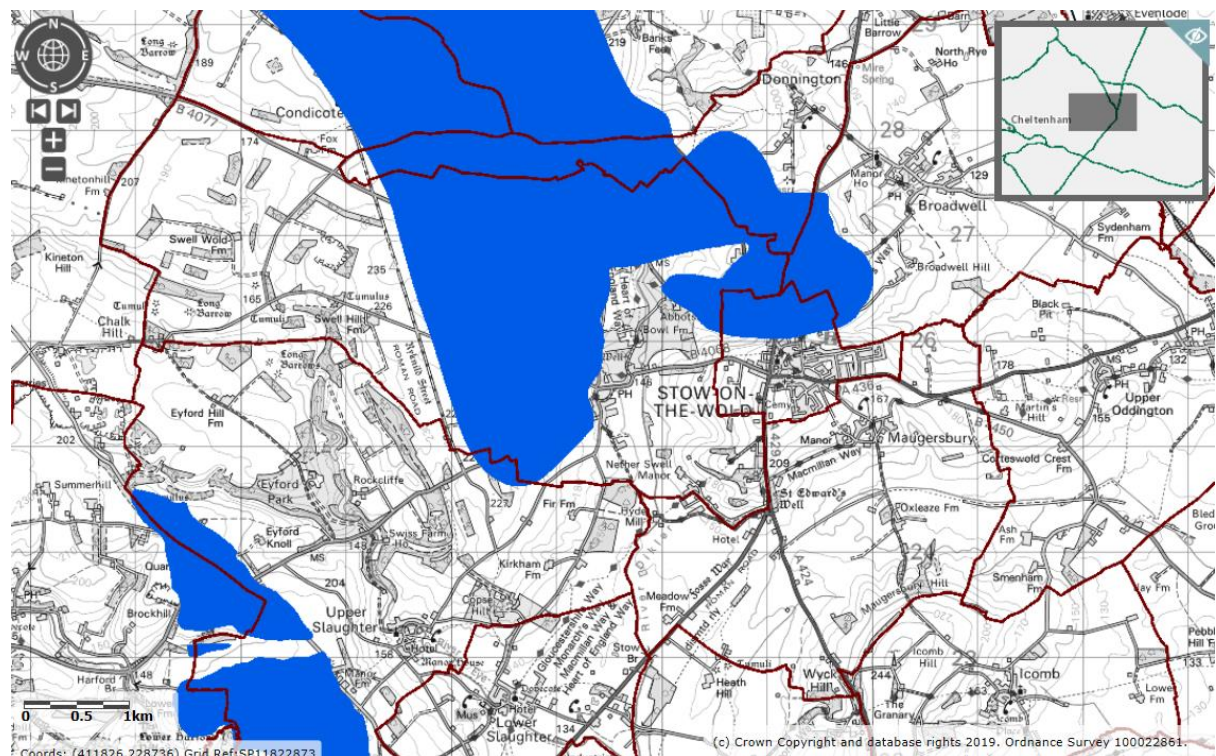


Figure 4



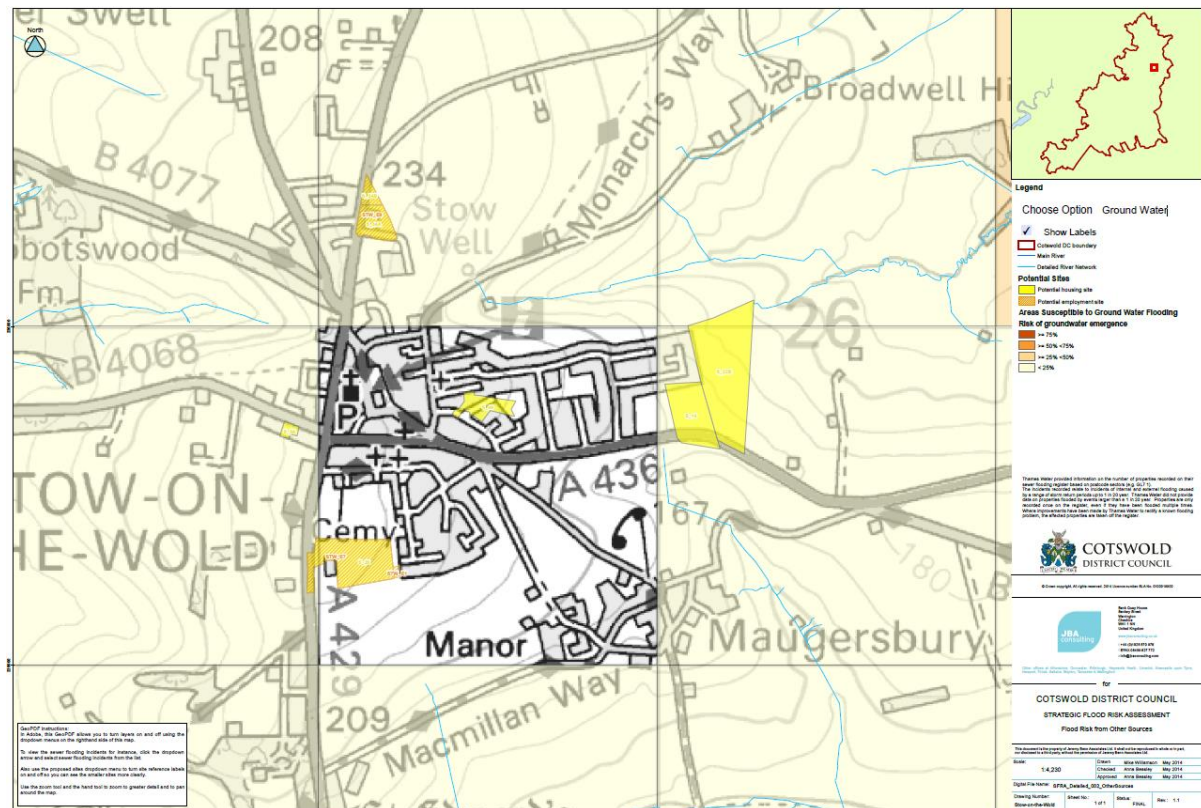
- Flood Zones – No significant fluvial or surface water flood risk issues are highlighted by the Cotswold Strategic Flood Risk Assessment for Stow on the Wold. The SFRA suggests it is also in the lowest category of risk of groundwater flood emergence (figure 6), and that there are no notable surface water flooding problems at Stow-on-the-Wold (Strategic Flood Risk Assessment Level 2, Appendices, 2016).
- Further west in the NDP area, Environment Agency flood maps⁹ show a small area of high risk surface water flooding to the east of Upper Swell and flood zones along the smaller watercourses. The River Dikler flows through the Neighbourhood Area in a north - south orientation, and is located immediately east of the villages of Upper Swell and Lower Swell, approximately 1.2km west of the built up area of Stow-on-the Wold.
- Source Protection Zones (figure 5) – Reflecting the vulnerability of groundwater in the area to pollution, Source Protection Zone III (total catchment) covers an area to the north of Stow and west of the Swells. (MAGIC interactive maps, Natural England).

Figure 5



⁹ <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Figure 6



Is the neighbourhood plan likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan?

- 3.19 While the Neighbourhood Plan is likely to focus on more local detail than the Local Plan, The Planning Inspector stated in his report that he was ‘...satisfied that the sustainability appraisal that has been carried out throughout the process of preparing the Plan, as required by section 19(5) of the Act, has complied with the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance’. 10 (Para.24, Cotswold District Local Plan 2011-2031: Inspector’s Report June 2018).
- 3.20 The SA looked at ten potential allocation sites in and around Stow. At least one potential allocation site in the NDP, the allotment site proposed in the NDP has not been assessed

¹⁰ <https://www.cotswold.gov.uk/media/1605407/Cotswold-Local-Plan-Report-Final.pdf>



either through the Strategic Housing Land Availability Assessment (SHLAA) or the District SA process.

- 3.21 It is important to note that for Stow, ***'All of the areas are significantly constrained by their location within the AONB'*** (SA, 2017, p.45) The SA tested and recommends measures to limit the potential significant effects, for all sites.

Assessment - HRA

- 3.22 The Cotswold District Local Plan was subject to HRA which looked at designated sites which could be impacted by development within Cotswold District. Appropriate Assessment concluded that adverse effects on any European Sites were ruled out in relation to physical loss, damage to habitat, air pollution, increased recreation pressure, and no likely significant in-combination effects with other authorities' development plans.
- 3.23 This section provides a HRA screening for the Stow and Swell NDP as to whether Appropriate Assessment is required.
- 3.24 The closest Natura site however is some 18.5km away beyond the 15km District HRA 'area of search'. *'With respect to Cotswold District the potential for significant effects on European Sites beyond the 15km distance is considered unlikely...'* (para. 3.4, page 10, HRA Jan 2017).
- 3.25 Development is likely within the Neighbourhood Plan area, and could have a potential impact on 'transient species' i.e. those which travel beyond the SAC area to roost or forage. However the Local Plan HRA also states, *'In all cases the [SAC] sites are not close enough to the District boundary for effects relating to offsite habitat loss to be a concern...'* (Local Plan HRA, Jan 2016 para 3.16)

Neighbourhood Plan	Likely activities (operations) to result as a consequence of the proposal	Likely effects if proposal implemented <i>e.g. increased air pollution, erosion trampling and general disturbance from recreation pressure, and physical loss or damage to habitat</i>	European site potentially affected	Possible effects in combination with other plans	Could the proposal have likely significant effects?
Stow and Swell	Housing and car parking allocations Increase in population,	None The NDP is not within the vicinity of a SAC or SPA and proposed	Bredon Hill is the closest SAC. It is approximately	The NDP does propose development. However given the distance to	Unlikely. The NDP is not within the vicinity of a SAC or



Neighbourhood Plan	Likely activities (operations) to result as a consequence of the proposal	Likely effects if proposal implemented e.g. <i>increased air pollution, erosion trampling and general disturbance from recreation pressure, and physical loss or damage to habitat</i>	European site potentially affected	Possible effects in combination with other plans	Could the proposal have likely significant effects?
	vehicular traffic, pollution.	allocations are not of a large strategic scale. Likely to be positive effects from policies which support protection local green/open spaces, sustainable transport and to work locally for example.	18.5km to the north west of the NDP area.	the nearest SAC, and scale of development proposed, it is unlikely any effects with Local Plan may combine with the NDP to have adverse effect. FYI -No such effects were identified by the HRA and Appropriate Assessment for the District Local Plan.	SPA, which lie beyond the 15km HRA 'area of search'

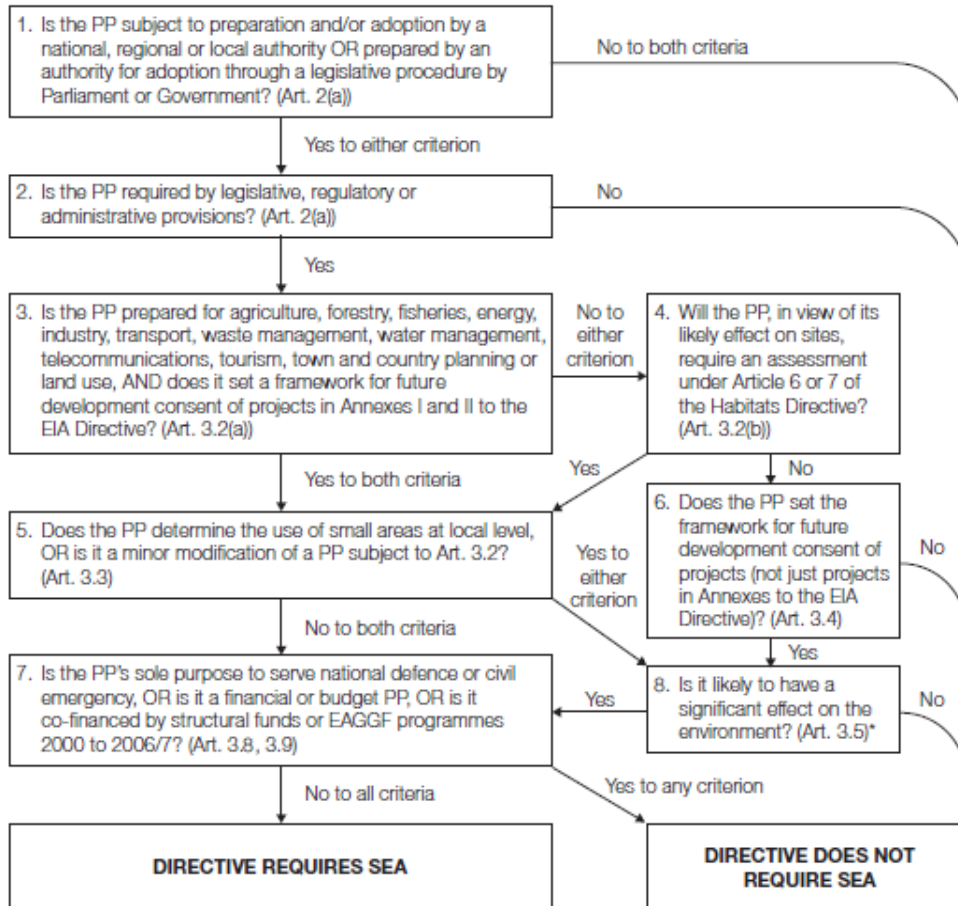
- 3.26 The NDP does propose development, but must be in general conformity with the Local Plan, which also includes policy (EN9) to safeguard such sites from development that could cause a significant adverse effect on the integrity of the SAC.
- 3.27 It is not considered that any further stages of HRA (Appropriate Assessment) are required for the NDP.

Assessment – Is an SEA required?

- 3.28 The process for screening a planning document in order to ascertain whether a SEA is required is illustrated below (ODPM 2004 Guidance):

Figure 2 – Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

3.29 The table below is drawn from the 'decision making' flow diagram above, based on the information gathered above¹¹. It helps establish the need for a SEA.

Stage	Y/N	Reason
1 Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The Neighbourhood Development Plan will be 'made' by Cotswold District Council as the Local Authority. The Plan is prepared by the relevant Qualifying Body - Stow and Swell Town and Parish Councils. The NDP is adopted through a legislative procedure and supports the implementation of the Local Plan.
2 Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	The Neighbourhood Plan is an optional plan and not a requirement. The requirement for a NDP to have an SEA depends

¹¹ RTPI SEA/SA Guidance, January 2018



Stage	Y/N	Reason
		on its content and therefore it is necessary to screen the likely significant environmental effects of the NDP in line with the SEA Regulations.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))	N	The Neighbourhood Plan is prepared for town and country planning purposes, but it does <i>not</i> set a framework for future development consent of projects in Annexes I and II to the EIA Directive (Art 3.2 (a)) ¹² . http://ec.europa.eu/environment/eia/eia-legalcontext.htm
4 Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	N	<p>See also 'screening assessment for HRA' in section of this document.</p> <p>A District wide HRA Report for Cotswold District was prepared for the Local Plan process. The HRA Screening conclusions for the Local Plan were that a number of policies may result in significant effects on European Sites. These were considered further in Appropriate Assessment in 2017. This concluded that adverse effects on the integrity of any of the sites could be ruled out in relation to physical loss, damage to habitat, air pollution, increased recreation pressure, or in-combination effects with other development plans.</p> <p>Of the 8 Natura Sites looked at in the HRA Report, Bredon Hill is the closest to Stow and Swell Neighbourhood area, but lying outside of the District boundary just within the 15km buffer, and to the north west of the NDP area approximately 18.5km beyond its own boundary.</p> <p>As the levels of development supported by the NDP are not in the vicinity of SAC it is unlikely that a further HRA is needed</p> <p>In light of a recent ECJ¹³ ruling proximity or presence to a European site may trigger SEA if there is a potential impact, where mitigation measures <i>cannot</i> be used to conclude there is 'no significant effect'. While the NDP does seek to allocate sites for</p>

¹² Annex I (railways, roads waste disposal installations, waste water treatment plants), but also Annex II other types such as urban development projects, flood-relief works, changes of Annex I and II existing projects...

¹³ The People Over Wind and Sweetman vs. Coillte Teoranta



Stage	Y/N	Reason
		<p>development but no mitigation policies are included in the Plan proximity (within 15km buffer¹⁴) to overcome any effect on the SAC.</p> <p>It is considered that the NDP will not affect the specified Natura 2000 site over and above the impacts identified in the HRA Report carried out for the Local Plan. Therefore a full Appropriate Assessment is not considered to be required for the NDP.</p> <p>The HRA submitted alongside the Local Plan to Examination can be found here: https://www.cotswold.gov.uk/media/fcolqyg3/5501-habitats-regulations-assessment-report-apr-2017.pdf</p>
5 Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	<p>The Neighbourhood Plan will apply to a wider area than a small area (like a building plan) but it is at local level.¹⁵ – ‘only requires SEA if it is likely to have significant effects’ (article 3 (3)).</p> <p>It is not a minor modification to an existing plan.</p>
6 Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Y	<p>An NDP is (a framework) to be used in determining future planning applications, and once ‘made’ will form part of the statutory development plan. It sets a framework beyond those projects listed in the EIA Directive, but does so more generally.</p> <p>The Local Plan allocations plan set a wider framework for the District including this area.</p> <p>However there is the potential/ intention for the NDP to set a development framework for smaller sites.</p>
7 Is the PP’s sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)	N	<p>The (sole) purpose of the NDP is not for any of those categories listed in Art 3.8,3.9.</p>

¹⁴ Para 3.4, HRA Report, January 2017

¹⁵ The European Commission guidance (paragraphs 3.33–3.35) suggests that plans or programmes which determine the use of small areas at local level might include “a building plan which, for a particular, limited area, outlines details of how buildings must be constructed, determining, for example, their height, width or design.... The complete phrase... makes it clear that the whole of a local authority area could not be excluded (unless it were itself small)”.

Stage	Y/N	Reason
8 ¹⁶ Is it likely to have a significant effect on the environment?	Y	<p><i>See Table 3 below 'Assessment of the likely significance of effects' of the NDP.</i></p> <p>Stow and Swell NDP supports development and proposes housing and parking allocations, and as such there is a level of proposed development in the Plan to impact upon environmentally sensitive areas. It is considered there could be an impact in particular on a nationally recognised designation of Areas of Outstanding Natural Beauty (AONB). Although the Neighbourhood Area does not have any European Natura 2000 Sites (SAC). Policies in the draft NDP change the use of the land and promote development .</p> <p>More locally there are identified SAMs, Key Wildlife Sites, Priority Habitats, listed buildings, and Conservation Areas. Development is likely to affect (positively or negatively) the sensitive natural and cultural heritage of the area.</p> <p>The impact of any potential development (in general conformity with the Local Plan) is expected to be localised but could be significant especially in the context of Stow's prominent hilltop position.</p>

Table 2

Given the 'Yes' responses above, it is considered that the Neighbourhood Plan is within the scope of the SEA Regulations, and that a determination is therefore required as to whether the Stow and Swell NDP is likely to have significant effects on the environment and full SEA/SA should be carried out.

Assessment – Are there likely significant effects?

3.30 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations include two sets of characteristics for determining the likely significance of effects on the environment:

- The characteristics of the Plan itself and

¹⁶ Annex II of the SEA Directive– Criteria for determining the likely significance of effects on the environment.

- The characteristics of the effects and of the area likely to be affected by the plan

3.31 These criteria are set out in table 3 below;

8. Is it likely to have a significant effect on the environment?	Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive)	Summary Significant Effects
1.The characteristics of the Plan, having regard in particular to:		
Yes	The degree to which the plan or programme sets a framework for projects or other activities, either with regard to the location , nature, size and operating conditions or by allocating resources	The Stow and Swell Neighbourhood Plan will set out the framework to be used to determine proposals for development within the neighbourhood. It also seeks to-allocate additional land and proposes housing development in excess of that identified for Stow within the Cotswold District Local Plan.
No	The degree to which the plan or programme influences other plans or programmes including those in a hierarchy	The Stow and Swell Neighbourhood Plan can only provide policies for the area it covers while the policies at the District and National level provide a strategic context for the NDP to be in general conformity with. Proposals within the NDP need to be considered when the District Local Plan is reviewed. None of the policies in the draft NDP are likely to have a direct impact on other plans in neighbouring areas.
No	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	<p>A Neighbourhood Plan is required to contribute to the achievement of sustainable development. It is not specifically a plan for integrating environmental considerations. Any development must also be in accordance with the NPPF and in general conformity with the Local Plan.</p> <p>The proposals in the NDP look to balance environmental, social and economic considerations such as sustainable modes of transport encourage local businesses and designate Local Green Space. In particular to the NDP is the importance of the affordable housing need and an ‘unbalanced’ aging population age.</p> <p>It is considered overall, that as-development is also allocated, any impacts on the local environment and places valued by the local people are likely to be both positive and negative.</p>
Yes/No?	Environmental problems relevant to the plan	There are no specific environmental problems noted in the NDP itself that have not already been assessed and considered through the Local Plan and its accompanying SA.



8. Is it likely to have a significant effect on the environment?	Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive)	Summary Significant Effects
		<p>However for Stow, 'All of the areas are significantly constrained by their location within the AONB' (SA, 2017, p.45) The SA tested and recommends measures to limit the potential significant effects, for all sites; including high quality design and layout which reflects the special characteristics of the AONB, and conservation area where appropriate, and protection of key on-site landscape features and landscaping measures (p.59)</p> <p>The Stow and Swell Neighbourhood Plan intends to allocate land Any adverse impact on the environment arising from the NDP proposals (causing environmental problems) maybe considered significant within the environmental constraints of Stow on the Wold and therefore the effects are uncertain¹⁷.</p>
No	The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans linked to waste management or water protection)	The Stow and Swell Neighbourhood Plan is to be developed in general conformity with the Local Plan, the Gloucestershire Minerals and Waste Plans, and national policy. Therefore the implementation of (EU) community legislation on water protection or waste is not relevant to the NDP.
2. Characteristics of the effects and of the area likely to be affected, having regard in particular to:		
Yes	The probability, duration, frequency and reversibility of effects	<p>Development is supported within the NDP and therefore an element of environmental change will occur, the impacts of which will depend upon the proposals and subject to the policies of the Local Plan.</p> <p>The NDP also seeks to minimise the negative effects of potential development and ensure positive impacts to 'enhance and conserve the unique character of the area.'</p> <p>It is considered possible that proposals in the NDP will lead to adverse effects on the environment, as changing the use of the land, is proposed. It is likely therefore that there will be some environmental effects however that should be investigated through</p>

¹⁷ "...The key criterion for the application of the EU Directive, however, is not the size of area covered but whether the plan or programme would be likely to have significant environmental effects". The European Commission guidance (paragraphs 3.33–3.35).



8. Is it likely to have a significant effect on the environment?	Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive)	Summary Significant Effects
		SEA.
Yes?	The cumulative nature of the effects	Any development will likely have some impact and several options are proposed beyond the development boundary of Stow. See above.
No	The transboundary nature of the effects	Effects will be local with limited effects on neighbouring areas as the proposals within the NDP only apply to the designated area.
No	The risks to human health or the environment (e.g. due to accidents)	No risks have been identified
No?	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	<p>The Neighbourhood Area covers an area of about 15.9km² and contains a population of 2,431 (2011 Census). The scale of development supported by the NDP is relatively limited therefore the effects are uncertain, as they are likely to be localised but several allocations are promoted; although the numbers of dwellings proposed within the draft NDP are not of a strategic scale.</p> <p>It is unlikely that the effects of the proposals will be large scale and extensive in terms of area or population, they are within a sensitive nationally designated area, often beyond the development boundary of Stow.</p>
Yes	The value and vulnerability of the area likely to be affected due to; i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards iii) intensive land-use	<p>The Stow and Swell Neighbourhood Plan is considered likely to adversely affect the value and vulnerability of the area in relation to natural /cultural heritage as the Plan area is washed over by the Cotswold AONB, and the NDP also contains 7 SAMs, including one on the north western edge of Stow, and a Conservation Areas in Stow (which extends into Mangersbury) and others in Upper and Lower Swell.</p> <p>The District SA (2017) states that all sites it appraised <i>'are significantly constrained by their location within the Cotswold AONB'</i> (p.42). Of those areas relatively less constrained within the boundaries of Stow, they have <i>'the potential to have effects on the conservation area and landscape setting of town'</i>. The potential allotment site has not been assessed through the Strategic Housing Land Availability Assessment (SHLAA) or subsequently the SA for</p>

8. Is it likely to have a significant effect on the environment?	Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive)	Summary Significant Effects
		<p>example, and some sites are promoted beyond the development boundary of Stow.</p> <p>The level of development supported by the proposals in the NDP will lead to a change of more intensive (allotment to housing, or field to parking) land use and parking. There is the possibility of significant environmental effects due to the location of the NDP i.e. in an area with 'special natural characteristics or cultural heritage.'</p> <p>Overall there are likely significant environmental effects that should be investigated through SEA.</p>
Yes	The effects on areas or landscapes which have a recognised national community or international protections status	<p>The level of development supported by the proposals in the NDP is likely to be some 150 dwellings, but the potential development sites are wholly within the sensitive and nationally designated Cotswold AONB, some of which are proposed beyond the development boundary of Stow. The Town of Stow also has a conservation area with listed buildings and SAM (prehistoric enclosure).</p> <p>The NDP area is not within or adjacent to any internationally protected SAC and unlikely to lead to additional pressures on the European designated SAC</p>

Table 3

Conclusion

- 3.32 Regulation 9 of the SEA Regulations requires that the responsible authority shall determine whether or not a plan is likely to have significant environmental effects. It shall
- a) take into account the criteria specified in Schedule 1 to these Regulations and
 - b) consult the consultation bodies
- 3.33 National Planning Guidance (NPPG) advises that a Neighbourhood Plan might require a SEA where a neighbourhood plan allocates sites for development; and or the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; and likely to have significant environmental effects that have not already been considered and dealt with through a SA of the Local Plan.



- 3.34 A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan (NPPG, para 043).
- 3.35 Development is supported within the draft NDP for some 150 dwellings and parking, some of which are likely to be beyond the development boundary of Stow; and therefore an element of environmental change will occur.
- 3.36 The NDP area is wholly within the 'sensitive' Cotswold Area of Outstanding Natural Beauty (AONB). In addition to the potential environmental harm to the scenic beauty and landscape of the AONB, the prominent setting of Stow on the Wold, and the historic environment (sites may be adjacent or close to the conservation area), may also require investigation.
- 3.37 The District SA (2017) states that all sites it appraised in the area '*are significantly constrained by their location within the Cotswold AONB*' (p.42). The Local Plan did not allocate land at Stow. The potential allocation at the allotment site has not been assessed through the Strategic Housing Land Availability Assessment (SHLAA) or the District SA, for example.
- 3.38 Overall it is considered that the level of development proposed to be allocated in the NDP (including car parking and affordable housing) could have potentially significant environmental effects on a sensitive nationally designated area that should be investigated further through SEA.
- 3.39 A Scoping Report has been produced by consultants (AECOM) for the NDP, and this screening opinion, for clarity, forms the formal 'thinking' behind that decision.
- 3.40 It is considered that the Stow and Swell Neighbourhood Plan **requires a full SEA but not a HRA to be undertaken** as it is not within the vicinity of a SAC.
- 3.41 The Screening Report was provided to the statutory environmental consultation bodies for SEA (Historic England, the Environment Agency and Natural England) for their opinion. The 5 week consultation period ended on the 25th September 2020, with no objections being raised (See their responses, where provided, Appendix 2).
- 3.42 Based on the Screening Report and taking into account responses from the statutory environmental bodies, it is **determined** by Cotswold District Council as the 'responsible authority', in accordance with SEA Regulation 9, that the Neighbourhood Plan is likely to have significant environmental effects and is therefore 'screened in' i.e. that a Strategic Environmental Assessment is required.
- 3.43 In accordance with Regulation 106(1) of the Habitats Regulations, Cotswold District Council, as the 'competent authority,' does not consider that an 'appropriate assessment' is required.
- 3.44 If the issues in the Neighbourhood Plan should change then a new screening may need to be undertaken. New development proposals in Stow and Swell will be determined in line with the Local and Neighbourhood Plans, and may individually require screening for Environmental Impact Assessment (EIA) based on their type, scale and location.
- 3.45 Even if an SEA is not legally required preparation of an SA (not SEA) report could be useful because it documents how the neighbourhood plan contributes to sustainable development, which is one of the 'basic conditions,' a legal requirement, that the plan must meet to proceed to referendum ([Appendix 1](#)).



Appendix 1

NPPG on Neighbourhood Planning - Paragraph: 065 Reference ID: 41-065-20140306

What are the basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum?

Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in [paragraph 8\(2\) of Schedule 4B to the Town and Country Planning Act 1990](#) as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). [Read more details.](#)
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders. [Read more details.](#)
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders. [Read more details.](#)
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. [Read more details.](#)
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). [Read more details.](#)
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. [Read more details.](#)
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan). [Read more details.](#)



Appendix 2

Consultation Response –

Historic England:

25/9/2020

Dear Joanne

Thank you for your SEA Screening Opinion consultation for the emerging Stow-on-the-Wold and Swell Neighbourhood Plan.

We are happy to concur with the view that a full SEA is required.

Apart from this consultation our only involvement in the preparation of the Plan so far has been a consultation in 2017 on the associated SEA Scoping. I attach that response again here for information.

Kind regards

David

David Stuart | Historic Places Adviser South West

Historic England | 29 Queen Square | Bristol | BS1 4ND

<https://historicengland.org.uk/southwest>

Consultation Response –

Natural England:

13/10/2020

Dear Joanne

Planning consultation: Request for SEA/HRA Screening Opinion on a NDP - draft Stow-on-the-Wold and Swell Neighbourhood Plan

Thank you for your consultation on the above dated 21 August 2020 which was received by Natural England on the same day. We are sorry for the delay replying. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment – Screening

We welcome the production of this SEA Screening report. Natural England notes and concurs with the screening outcome i.e. that SEA is required. This reflects the NDP's proposal to allocate housing within the Cotswolds Area of Outstanding Natural Beauty (AONB) and takes account of the local plan Sustainability Appraisal conclusions.

Habitats Regulations Assessment Screening

Natural England notes the screening process applied to this Neighbourhood plan. We agree with the Council's conclusion of no likely significant effect upon the named European designated sites:

- Bredon Hill SAC
- Dixon Wood SAC
- Cotswold Beechwoods SAC
- Rodborough Common SAC

For any queries relating to the specific advice in this letter only please contact me on XXX. For any new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

Yours sincerely

Antony Muller
Lead Adviser – West Midlands Planning for A Better Environment Team